



Gladstone Ports Corporation

Growth, prosperity, community.



Code of Conduct Policy

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Brief description

The Code of Conduct Policy is based on the Gladstone Ports Corporation (GPC) Vision, Mission, Corporate Values and Guiding Principles and regulatory obligations. It outlines how people associated with GPC are expected to behave. As the custodians of our business, our people and our reputation, the Senior Executives and employees of GPC are required to demonstrate leadership and commitment to this Code.

This Policy sets the minimum standards of behaviour, whilst outlining the required ethical standards and applicable legal obligations for employees, contractors, visitors, customers and port users.

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Document accountability	
Role	Position
Owner	Board
Custodian	Chief Executive Officer

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1 Terms and definitions

The following key terms and definitions apply to this Policy:

“**Code**” means this Code of Conduct.

“**Confidential information**” means trade secrets and other information regarding the affairs of GPC or any associated entity which you receive in the course of employment or engagement with GPC in circumstances where the employee knows or ought to know that the information is to be treated as confidential and includes without limitation:

- (a) business plans and forecasts;
- (b) financial records, reports, accounts and proposals;
- (c) quotations and tenders submitted or prepared for submission to customers or potential customers;
- (d) customer lists, names of customer contacts and terms of trade with customers;
- (e) supplier lists, names of supplier contacts and terms of trade with suppliers;
- (f) formulae, technical information, plans and product or process specifications;
- (g) any other information of GPC including employee information:

except where that information is available to and known by the public otherwise than through a failure on your behalf.

“**Consultant**” means a person who provides professional or expert advice under an arrangement with

“**GPC**” means who does not fall within the definition of Employee.

“**Contractor**” means a person or entity who provides professional or expert advice or services pursuant to a contract for service to GPC who does not fall within the definition of Employee. This will include employees or contractors of contractors to GPC. It does not however include these individuals contracted to GPC.

“**Corrupt Conduct**” means conduct of a person, regardless of whether the person holds or held an appointment with GPC, that:

- (a) adversely affects, or could adversely affect, directly or indirectly, the performance of functions or the exercise of powers of GPC or a person holding an appointment with GPC; and
- (b) results, or could result, directly or indirectly, in the performance of functions or the exercise of powers mentioned in a) in a way that is not honest or is not impartial, or involves a breach of the trust placed in a person holding an appointment with GPC, either knowingly or recklessly, or involves a misuse of information or material acquired in or in connection with the performance of functions or the exercise of powers of a person holding an appointment with GPC; and
- (c) is engaged in for the purpose of providing a benefit to the person or another person or causing a detriment to another person; and
- (d) would, if proved, be a criminal offence or a disciplinary breach providing reasonable grounds for terminating the person's services, if the person is or were the holder of an appointment with GPC.

“**Custodian**” means under the GPC governance structure, the Custodian is accountable for monitoring the application of the system and advising the owner of the monitoring outcomes, and is also accountable for proposing system design or redesign and facilitation of conformance.

“**GPC**” means Gladstone Ports Corporation Limited, including subsidiary companies.

“**Guiding Principles**” means GPC's Guiding Principles as outlined in clause 2.1.4 of this Code.

“**Employee**” means any person appointed by GPC to a position on a permanent, temporary, fixed term or casual basis, or an apprentice, trainee or vacation student.

“Leader” means any person who is accountable for the work output of others, or a function within the business, or who provides specialist advice/support within the business.

“Managing Discipline Specification” refers to the GPC Governance Framework document DOCSCQPA#960456 Managing Discipline Specification, which documents processes for managing allegations of unsatisfactory conduct.

“Official duties” means day to day activities performed by GPC representatives as part of their role accountabilities and responsibilities.

“Owner” means under the GPC governance structure, the Owner is accountable for approval and has the authorised discretion to implement or significantly change the system. Accountable for the document and its content.

“People” includes Board Members, the Chief Executive Officer, Leaders, Employees, Employees of subsidiaries, Contractors, Consultants and Port Users.

“Public Interest Disclosure (PID)” means a PID is an allegation raised by an Employee in relation to information about:

- (a) the conduct of an Employee, Contractor, Board member or the Chief Executive Officer of GPC that could, if proved, be Corrupt Conduct; or
- (b) the conduct of another person that, if proved, be a reprisal that relates to a previous disclosure made by the Employee to GPC or the Crime Corruption Commission.

“Values” means GPC’s Values as outlined in clause 2.1.3 of this Code.

“Zero Harm” means an approach to occupational safety that aims to operate a workplace without exposing an individual to injury/illnesses during work activities through the implementation of safe work systems.

2 Introduction

2.1 Policy purpose

This policy is about GPC's Code of Conduct, which is based on the corporation's Vision, Mission, Corporate Values and Guiding Principles, and regulatory obligations. It outlines the expected standards of conduct and values that all persons must demonstrate whilst working with GPC.

2.2 Policy scope

This policy applies to the GPC Board Members, Chief Executive Officer, GPC Employees, Employees of subsidiaries, Contractors, Consultants, visitors and port users and any other personnel notified that this Code applies to them. Everyone working for GPC, from the Chief Executive Officer through all levels including Employees, Contractors and Board members in the organisation, are all equal when it comes to observing this Code. If you are unsure of any particular aspect of the Code, you should discuss this with your Leader.

2.3 Policy objectives

GPC desires to foster an environment which is professional, customer responsive, safe and free from any form of unlawful, corrupt or inappropriate behaviour.

It is a fundamental principle of GPC that all its business affairs are conducted respectfully, legally, ethically and with strict observance of the highest standards of integrity and propriety. The GPC Code is based on this principle.

This Policy and the Code provides a clear set of expectations that our People and act with respect, honesty, integrity and transparency, as these qualities cultivate the trust of our customers, colleagues and the community.

Our People are required to ensure they are familiar with this Policy and Code and to ensure their personal behaviour is at all times consistent with the expected standards of conduct.

The primary objective of this Policy is to set the minimum standard of behaviour required by GPC, aligned to GPC's Mission, Values and Guiding Principles and governance frameworks.

This Policy also outlines the consequences for possible breaches of the Code, including corrupt conduct.

3 Gladstone Ports Corporation Code of Conduct

3.1 Our Vision, Mission, Values and Guiding Principles

(a) Our Vision

GPC's vision is to be Australia's premier commodity port.

(b) Our Mission

To responsibly manage, develop, and facilitate prosperity of others through operating our port facilities and services in an economically, environmental and socially sustainable manner.

(c) Our Values are:



GROWTH

Develop & Grow

We are absolute in our resolve to make a difference. Better people and brighter prospects for future generations. We are not content to rest - encourage high performance. Challenge with respect and courage in our endeavour to maximise our Ports contribution. We will always find a way.



PROSPERITY

Create & Sustain

We are focussed on facilitating prosperity for others that trade through our Ports. Through our efforts, our customers, shareholders and ourselves will benefit. We will not take for granted what has been created, we will not let it slip, we are united in maximising the region's prosperity. We are proud people.



COMMUNITY

Care & Contribute

We are family. We look out for each other. We are respectful neighbours and contribute to our region. We treat our visitors and customers like we do ourselves. We empower people and avoid harm. We demonstrate humility and strive for our communities implicit trust. We acknowledge all communities.

3.2 Behaviours required to comply with our Code

GPC expects our People to demonstrate their commitment to this Code through adherence to the following 6 principles:

- (a) We put safety above all else:
 - (i) We have a relentless commitment to Zero Harm
 - (ii) We are fit for work.
- (b) We comply with:
 - (i) The Law
 - (ii) Our governance systems
 - (iii) Communication requirements.
- (c) We value our People:
 - (i) We respect other People and demonstrate professionalism in everything that we do at work.
- (d) We contribute to our customer's success.
 - (i) We provide excellent customer service internally and externally.
- (e) We use our resources and information appropriately:
 - (i) Resources
 - (ii) Maintain and protect GPC information
 - (iii) Avoid conflicts of interest.
- (f) We are committed to sustainability and community support:
 - (i) Sustainability
 - (ii) Community Support.

3.3 Breaches of the Code

Breaches of the Code will be treated as a serious matter and may have serious consequences. Employee breaches of this Code will be managed in accordance with the Managing Discipline Specification. If any Employee breaches, or is suspected of breaching, this Code, their conduct may, if substantiated, give rise to disciplinary action up to and including dismissal. Contractors who breach this Code may have their contracts with GPC terminated.

3.4 Reporting Corrupt Conduct and unacceptable behaviour

Unacceptable behaviour that may constitute Corrupt Conduct or reprisal action must be reported to GPC for further action if necessary, in accordance with the Public Interest Disclosure Procedure.

4 More information

This Policy will be available to all GPC Employees, Employees of subsidiaries, Consultants, Contractors, the Chief Executive Officer, port users and Board members.

This document is uncontrolled when printed. The current version of this Code is available on GPC's Intranet.

If you require any further information, please contact your Leader in the first instance. Alternatively, you may contact Human Resources Specialists or alternatively the Custodian, listed under Document Accountability on the cover page.

This Code is supported by a number of more detailed policies (listed in Section 4.1.2 of this document).

5 Related Documents

5.1 Legislation and regulation

Key relevant legislation and regulation, as amended from time to time, includes but is not limited to:

Type	Legislation / regulation
Federal Acts	Age Discrimination Act (Cth) 2004 Australian Human Rights Commission Act (Cth) 1986 Disability Discrimination Act (Cth) 1992 Corporations Act (Cth) 2001 Fair Work Act (Cth) 2009 Privacy Act (Cth) 1988 Racial Discrimination Act (Cth) 1975 Sex Discrimination Act (Cth) 1984
State Acts	Anti-Discrimination Act (Qld) 1991 Crime and Corruption Act (Qld) 2001 Environmental Protection Act (Qld) 1994 Government Owned Corporations Act (1993) Human Rights Act (Qld) (2019) Public Interest Disclosure Act (Qld) 2010 Right to Information Act (Qld) 2009 Work Health and Safety Act (Qld) 2011
Other	Various Australian Standards, Memoranda of Understanding/Agreement and Government Policies are also applicable.

5.2 Gladstone Ports Corporation documents

The following documents relate to this Policy:

Type	Document number and title
Policy	DOCSCQPA#1439735 People DOCSCQPA#174070 Conflicts of Interest DOCSCQPA#89612 Fraud and Corruption Prevention DOCSCQPA#1409930 Handling of Complaints involving a Public Official DOCSCQPA#1473669 Sustainability
Standard	DOCSCQPA#1514428 Code of Conduct DOCSCQPA#931386 People Performance DOCSCQPA#87582 Equity, Diversity, Harassment & Discrimination DOCSCQPA#1447372 Conflicts of Interest DOCSCQPA#1198272 Personal Use of Social Media DOCSCQPA#1331115 Fit for Work DOCSCQPA#1239110 Alcohol and Other Drugs DOCSCQPA#1198272 Personal Use of Social Media DOCSCQPA#90191 Internet Acceptable Use DOCSCQPA#1378889 Mobile Device Acceptable Use Standard
Specification / Procedure	DOCSCQPA#1455068 Gifts and Benefits DOCSCQPA#941363 Public Interest Disclosure DOCSCQPA#945900 Performance Planning & Review DOCSCQPA#955719 Managing Unsatisfactory Performance DOCSCQPA#960456 Managing Discipline DOCSCQPA#1331120 Fatigue Risk Management DOCSCQPA#1198272 Information Privacy