

**OCCUPATIONAL HEALTH & SAFETY SYSTEM****DOCUMENT NAME** CODE OF CONDUCT POLICY**DOCUMENT TYPE** POLICY**RESPONSIBILITY** HR, SAFETY & SECURITY MANAGER**VERSION CONTROL AND CHANGE HISTORY**

VERSION NUMBER	APPROVAL DATE	APPROVED BY	AMENDMENT/S	NEXT REVIEW DATE
1-2010	01/02/2010	Chief Executive Officer	Original	01/12/2010
1.1-2011	01/02/2010	Chief Executive Officer	Reviewed	01/09/2012
2-2013	01/09/2012	Chief Executive Officer	Reviewed	01/12/2014
3-2014	01/12/2014	Chief Executive Officer	Reviewed	01/12/2016
4-2017	01/03/2017	Chief Executive Officer	Reviewed	01/03/2019
5-2020	19/02/2020	Managing Director	Reviewed; Formatting updated; Employee Sign Off added	01/03/2022
6-2021	26/07/2021	Managing Director	New Format	01/03/2023
7-2022	12/05/2022	Managing Director	Merge Employee Behaviour Code into the Code of Conduct Policy. Add Managing Director's signature. Removed Acknowledgement page as policy is now included in online training.	12/05/2025
8-2025	08/05/2025	Managing Director	Reviewed	01/05/2028

Please Note: Printing this document may make it obsolete.
For the latest version of this policy always check the OH&S Section of AAT's Intranet.



Code of Conduct Policy

Purpose

The purpose of this policy is to provide all Australian Amalgamated Terminal (AAT) employees with clear guidelines and expectations around the behaviours and attitudes expected whilst working for the company.

Scope

This policy applies to all AAT employees, contractors, and visitors.

Responsibility

There are two (2) key parties with responsibilities regarding of the Code of Conduct.

1. Employees: To ensure own compliance to this policy.
2. Senior Managers and Line Managers (Managers): To enforce this policy within their department and to ensure compliance and understanding.

Records

There are no records applicable to this policy except in the event of a breach in which case the records as outlined in the Counselling and Discipline Policy apply.

Policy

Shared Responsibilities

AAT will achieve its business objectives and exceed customer expectations while upholding the highest level of ethical conduct. In this regard, AAT's employees, Managers, and contractors share certain responsibilities:

- Treating all colleagues, partners, suppliers, and the community in a professional and fair manner always while being employed by or while representing AAT.
- Conducting their business with integrity and operating in compliance with all applicable laws.
- Avoiding situations where personal interests are, or appear to be, in conflict with the organisation's interests.
- Safeguarding and properly using the organisation's information, assets, and resources, as well as those that other organisations or people have entrusted to us.
- Maintaining confidentiality of non-public information and not acting on such information for personal gain; and
- Committing to quality performance, individually and as an organisation.

General Behaviours

- Respect diversity and individual differences to ensure all dealings with employees, management and external parties are free of discrimination, harassment, bullying and violence.
- Treat all individuals at the workplace with courtesy, respect and in a cooperative manner.
- Perform their duties diligently and to a satisfactory standard at all times.
- Provide efficient service, accurate information and prompt attention to customers and visitors.
- Observe safe working practices so as not to endanger themselves and others.
- Not interfere with any other employee to the detriment of that employee's performance of their duties.
- Endeavour to minimise adverse environmental effects of their actions.
- Be punctual and reliable in attendance for work.

NUMBER	DOCUMENT NAME	VERSION	REVIEW DATE	NEXT REVIEW DATE	PAGE NO.
05.01	CODE OF CONDUCT POLICY	8-2025	08/05/2025	01/05/2028	1



- Not leave their place of work without proper authority.
- Notify their Manager prior to their scheduled commencement of any inability to attend work.
- Gain approval for any planned leave prior to it being taken.
- Comply with all reasonable oral or written instructions given by the Manager or other authorised Company Representative.
- Report to their immediate Manager any personal injury or illness.
- Not take illegal substances, drugs or alcohol in the workplace.
- Actively participate in return to work and rehabilitation programs in accordance with medical advice.
- Refrain from engaging in irresponsible actions or practical jokes, which could put at risk the safety of employees or endanger life or cause damage to property.
- Immediately report any damage to property, incidents, accidents, near misses or hazards to their immediate supervisor.
- Observe confidentiality in regard to any Company or customer information gained through the course of their employment.
- Not participate in theft or fraud against the Company.
- Not make false statements about the Company.
- Not solicit or accept bribes or gifts from members of the public for the performance of their duties.
- Comply with relevant Awards, Certified Agreements, AWA's (as applicable), Contracts and AAT Policies.
- Refrain from speaking to or contributing information to the media in relation to the Company.
- Refrain from attending work whilst under the influence of any substance, which may impair their performance.
- Not wilfully damage and/or misuse Company property or gross negligence resulting in damage or loss to the Company.
- Refrain from committing on Company property any act that violates the Company policy on sexual and /or racial harassment or discrimination.
- Not downloading from the Internet or forwarding files of a pornographic, sexually explicit or offensive nature.

The above points are examples of required behaviour and are not meant to include or exclude every possible behaviour.

Compliance with Laws

AAT and all its employees comply with all laws in Australia. Violations of laws have serious consequences for the organisation and the individuals concerned, including criminal, civil and administrative sanctions. The organisation's policies and procedures and this Code are designed to help achieve compliance.

All employees are required to act within the limits of our authority. Any suspected breaches of the law by any employee are to be reported to their Manager or the Human Resources Representative.

Honesty and Integrity

AAT employees are required to:

- Act professionally, ethically, honestly, and courteously in all their dealings, and maintain the organisation's expected behaviours and good reputation.
- Refrain from making disparaging, misleading or untruthful comments about other employees, suppliers, volunteers, or associates with whom the organisation has business dealings.
- Provide all employees with equal opportunity.
- Refrain from bullying, harassing, or discriminating against others; and
- Act in accordance with this policy and other company policies always.

NUMBER	DOCUMENT NAME	VERSION	REVIEW DATE	NEXT REVIEW DATE	PAGE NO.
05.01	CODE OF CONDUCT POLICY	8-2025	08/05/2025	01/05/2028	2



Conflict of Interest

It is important that employees avoid any situation that may involve a conflict or the appearance of a conflict between personal interests and the interests of the organisation. In dealings with current or potential customers, suppliers, contractors, or other employers of paid or unpaid work, employees are expected to act in the best interests of the organisation and to the exclusion of personal advantage. Each employee must make prompt and full disclosure to his or her Manager any situation which may involve a conflict of interest.

- Conflicts of interest include, but are not limited to: Ownership by an employee, or a family member, of a significant financial interest in any enterprise which does or seeks to do business with the organisation.
- Serving as a director, officer, partner, or consultant or in any other key role in any enterprise which does or seeks to do business with the organisation.
- Acting as a broker, finder, or other intermediary for the benefit of a third party in transactions involving the organisation or its interests; and
- Any other arrangement or circumstance, including family or other personal relationships, which might influence the employee from acting in the best interests of the organisation.

Business Courtesies and Inducements

Offering, giving, soliciting, or receiving any form of bribe or “under the table” payment is prohibited. An especially strict standard applies where suppliers are involved. It is never acceptable to accept or give a personal gift in cash or cash equivalent. If you do receive a personal gift, please let your Manager know straight away.

Travel and Entertainment

Travel and entertainment should be consistent with the needs of the organisation. Employees who approve travel and entertainment expense reports are responsible for the reasonableness of expenditures, for ensuring that expense reports are submitted promptly, and that receipts and explanations properly support reported expenses. All employees must comply with the AAT Travel Policy which contains specific guidelines and restrictions.

Intellectual Property

Employees must use the organisations information, copyrights and trademarks in a manner that will safeguard them as assets of the organisation. Additionally, employees must not misappropriate or infringe the information, trademarks, or copyrighted works of others.

Employees must not use proprietary or confidential information for their own purposes or disclose the same to unauthorised employees or third parties. Employees should be aware that these obligations apply not only during but after termination of employment.

The Organisation's Property

AAT property should not be used for personal benefit or any other improper purpose. Company property should not be used, sold, loaned, given away, or otherwise disposed of, regardless of condition or value, unless authorised by the Managing Director.

Any theft, misappropriation or fraud will be dealt with in the strongest possible terms including, where appropriate, referral to police.

NUMBER	DOCUMENT NAME	VERSION	REVIEW DATE	NEXT REVIEW DATE	PAGE NO.
05.01	CODE OF CONDUCT POLICY	8-2025	08/05/2025	01/05/2028	3



Responding to Outside Enquiries

Only the Chief Executive Officer is authorised to respond to enquiries from lawyers or the media. Further detail is given in AAT's External Communications Policy.

Community Activities and Contributions

AAT believes in contributing to society and we encourage participation by our employees in community activities. Employees may not use AAT funds, assets, or resources to make any political or charity contributions without the prior discussion and authorisation of the Managing Director.

Other Employment & External Duties

AAT requires that all employees wanting to take paid or unpaid employment with another organisation, seek prior authorisation from the Chief Executive Officer where self-assessment has determined that there is:

- Conflict with AAT's organisational interests including our mission, vision, and values.
- Compromise AAT or its customers confidentiality.
- Impact on the productivity and efficiency of the individual, the individual's team and/or the organisation; or
- A negative effect on the "employee's" health and wellbeing.

Accounting and Record Keeping

AAT will continue to observe the most stringent standards in its financial records and accounts. The organisation's financial record keeping will reflect all components of transactions and reflect an honest and forthright presentation of the facts.

It is the responsibility of each employee to uphold these standards. Appropriate records must be kept of all transactions. Our employees will not make false or misleading entries in our books, maintain secret or unrecorded funds or assets, make a payment knowing it will be used for a purpose other than recorded, sign or ask another person to sign inaccurate, untruthful, or misleading documentation.

An employee whose activities result in false financial reporting will be subject to disciplinary action including termination.

Attendance and Participation in Meetings

Employees attending and scheduling meetings will ensure respect for all participants, will encourage participation, and will undertake preparation to ensure effective and rewarding outcomes. Meeting attendance, decision making, and outcomes will be appropriately documented and circulated after the meeting and employees commit to the undertaking of their agreed actions.

Incident Reporting

Employees who are unclear on any matter related to this Code or who become aware of any actual, potential, or suspected breach of this Code are requested to consult their Manager or the organisation's Human Resources Representative. Every reasonable effort will be made to protect the identity of the reporting employee if they elect to remain anonymous.

NUMBER	DOCUMENT NAME	VERSION	REVIEW DATE	NEXT REVIEW DATE	PAGE NO.
05.01	CODE OF CONDUCT POLICY	8-2025	08/05/2025	01/05/2028	4



Compliance with Code

Employees who breach this Code will be subject to disciplinary measures up to and including immediate dismissal. In addition, Managers who reasonably should have detected and reported a violation of the Code may be disciplined. An employee suspected of such a violation will be afforded the opportunity to explain his or her actions fully before any disciplinary action is undertaken.

Not every concern can be specifically covered in the Code. If you are faced with a situation in which the proper course of conduct is unclear to you, you should discuss it with your Manager or if you prefer to discuss the issue anonymously, please refer to AAT's Whistle-blower Policy.

Other policies and procedures not mentioned in the Code also apply to employees. Employees are expected to ask about, be familiar with and comply with all policies and procedures that apply to their positions and responsibilities

A handwritten signature in black ink, appearing to read 'ANTONY PERKINS', followed by a horizontal line.

.....
Antony Perkins
Managing Director

NUMBER	DOCUMENT NAME	VERSION	REVIEW DATE	NEXT REVIEW DATE	PAGE NO.
05.01	CODE OF CONDUCT POLICY	8-2025	08/05/2025	01/05/2028	5