

## Introduction

The Employee Code of Conduct describes the expected behaviour of Belway Labour Management employees and provides a framework of principles for conducting business with shareholders, customers, colleagues, suppliers, creditors and other stakeholders

Belway Labour Management is committed to ensuring our employees act with the utmost integrity and professionalism and to be scrupulous in the proper use of company information, funds, equipment, and facilities

## Our Values

- **Customer Centricity**
  - We value our customers and exist to add value to their operations
  - We remain approachable and responsive
  - We provide quality and flexible services, competitively and fairly
- **Loyalty, Integrity & Trustworthiness**
  - We are deeply rooted in strong, family-based traditions and uphold these qualities in all people and business dealings
  - We uphold the rules and laws of the areas in which we operate
  - We value long term relationships
- **Accountability, Openness & Transparency**
  - We take personal responsibility for decisions and actions
  - We are fiscally and environmentally responsible
  - We abide by all Awards and Agreements of customer sites we operate on
- **Employee Centricity**
  - We value and reward the contributions of our employees
  - We recognise the diverse backgrounds of our employees, their families, and the communities in which they originate and live
  - We strive to provide a safe and inclusive workplace

## Responsibilities

Employees are required to:

- promote the interests of the Group
- respect their co-workers, customers, suppliers and other service providers
- comply with laws regarding equal opportunity
- perform their duties with skill, honesty, care and diligence, using authority in a fair and equitable manner
- abide by policies and procedures, instructions and lawful directions that relate to their employment and duties
- comply with the spirit as well as the letter of the codes of conduct applying to the professions of individual Employees

# Employee Code of Conduct *(cont)*

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- act within the laws of the countries in which they operate

## Conflicts of Interest

Employees must avoid any personal, financial or other interest which may conflict with their duties and responsibilities to the Group.

- Any interest which may constitute a conflict of interest must be promptly disclosed to an appropriate senior manager.
- Accepting any external appointment, such as a board appointment, working for another organisation, or conducting a business that detracts from an employee's ability to fulfil their specified role for the Group is not permitted without the permission of the Director.

## Confidentiality

- Employees must ensure that all transactions in company securities comply with the law (particularly the insider trading provisions) and the Group's Securities Trading Policy.

## Company Property

- Group property, funds, facilities and services must be used only for authorised purposes.
- Unless governed by law or otherwise agreed in writing, any intellectual property developed by an Employee during or because of their employment by the Group is the sole property of the Group.

## Public Statements

- The Group's relationships with the media and the investment community are conducted exclusively by the Director or Group General Manager or as delegated by them.

## Safety

Employees must observe and comply with all safety practices and procedures introduced by the Company to maintain a safe workplace.

- Unsafe work practices must be reported to the immediate manager immediately.
- All Incidents must be reported to the immediate manager immediately.
- Group equipment is to be maintained in a safe operating condition.
- Protective equipment supplied by the Group or its Customers must always be correctly used by Employees.

## Environment

Employees must comply with relevant legislation and promote environmental awareness, to raise standards.

# Employee Code of Conduct (cont)

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- Employees must comply with the environmental policies of clients.
- Employees are to use energy and other resources efficiently.
- Employees are encouraged to support community activities in the areas in which they work.

## Gifts and Entertainment

- Employees, from time to time, entertain or are entertained, and give or receive gifts during their duties.
- Gifts should never be offered or accepted in circumstances where the outcome of a transaction may be influenced by the gift or give rise to the perception that the transaction may be influenced by the gift.
- Employees involved in a tendering process must refrain from actions which may give rise to an expectation of some favoured treatment from or by any tendering party.
- Under no circumstances must Employees offer or accept money.
- Gifts and entertainment must be of a size that is generally acceptable and free from any suggestion of bribery or secret commission.
- Bribing, or attempting to bribe, a foreign public official (even outside Australia) is a serious crime under Australian law with harsh maximum penalties (including imprisonment for individuals involved). The Company may also be liable for breaches by Employees. The definitions of "foreign public official" and "bribe" are very broad. Employees must ensure that they do not participate in any conduct which may directly or indirectly provide any benefit or advantage to a foreign public official where such benefit is not legitimately due or is intended to influence the foreign public official. Employees must read and comply with the attached Australian Government Fact Sheet on Foreign Bribery. Any questions about its application are to be referred to the Group General Manager.

## Compliance

- Employees must be aware of, and adhere to, company policies, especially those relating to health and safety, equal opportunity, privacy, trade practices and continuous disclosure.
- During their duties, Employees must comply with relevant laws and regulations of the country in which they work.

## Privacy

- Employees and the Group must comply strictly with the privacy principles of the Privacy Act.
- Private information about a co-worker, supplier, customer or any other person dealing with the Group must not be discussed without prior written consent.

## How the Group Complies with Legislation Affecting its Operations

- Within Australia, the Group strives to comply with the letter and the spirit of all legislation affecting its operations.
- The Group will abide by local laws in all countries in which it operates. However, the Group recognises that the laws in some countries may not be as stringent as the Group's operating policies, particularly

# Employee Code of Conduct (cont)

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in relation to the environment, intellectual property and the giving of “gifts”. Consequently, where Group policy is more stringent than local laws, Group policy will prevail.

## Breaches of the Code

- Employees have a duty to observe the code and ensure that no breaches occur. Breaches require immediate attention and Employees have a duty to report known or suspected breaches of the code.
- A complaint or disclosure about an alleged breach of the code should be in writing and contain details about the date, time and nature of the alleged breach and include any available support material. All reports are treated as confidential.
- The Company will protect any “whistle-blower” who reports a violation in good faith and on reasonable grounds and will comply with laws relating to “whistle-blower protection”.
- The allegation should be made to the Employee’s immediate supervisor, or if the Employee believes the immediate supervisor may be implicated, to a senior executive or to the Group General Manager.
- The Employee will be informed of the outcome of the investigation.
- If unsatisfied with the outcome of the investigation, the Employee may refer the matter to a senior executive or the Group General Manager.
- Employees may at any time discuss a matter or seek advice on how to proceed with a matter from the Company Secretary or any other senior executive.

## Conclusion

If an Employee has doubts about any aspect of this code, they must seek clarification from their manager or the Company Secretary.



Sam Balestra

General Manager  
Belway Labour Management  
1<sup>st</sup> October 2022