

The WorkPac System

WorkPac Code of Conduct

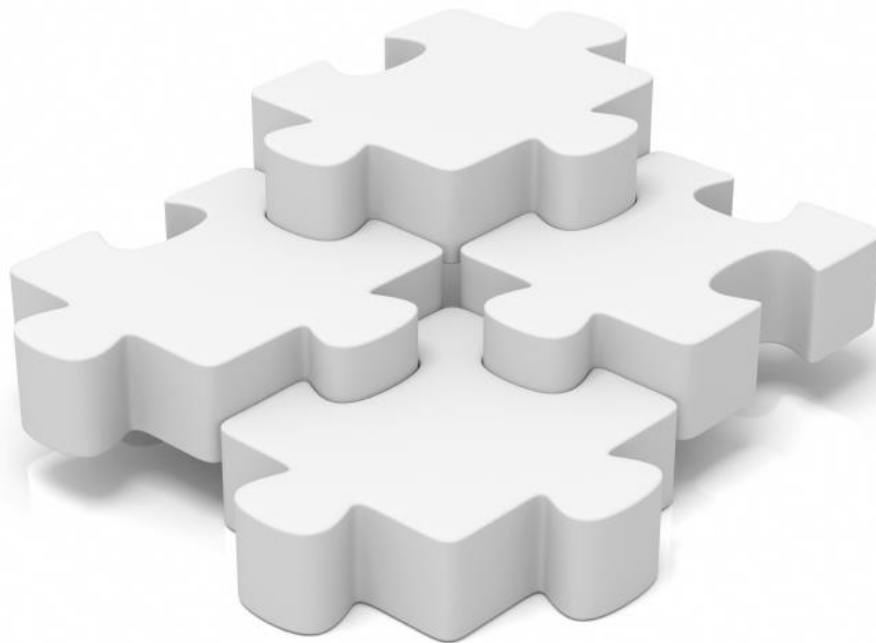


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MESSAGE FROM THE CHAIRMAN

I am proud to be part of an organisation that values and upholds high ethical standards as a key measure of our success. We do not focus solely on commercial outcomes; we also focus on the way we achieve them.

*Our successes have been built on strong foundations of respect, responsibility, courage, connection and valuing people, both within our organisation and externally. These values form the basis of our Code of Conduct (the **Code**).*

The Code sets out the manner in which WorkPac, expect those who work for or on behalf of WorkPac to conduct themselves. This applies to every person, at every level.

By adhering to the values set out in the Code, we all play a role in supporting and empowering each other to build strong relationships, achieve goals and have fun on the way.



In all of the work you do for or on behalf of WorkPac, please remember your shared responsibility to consistently apply the Code. Also, if you become aware of a breach of the Code or have any suggestions on how we can improve the way we behave, please speak up.

It is up to each of us to forge a future we can all be proud of.

*David Baxby
Executive Chairman - WorkPac*

PART A – UNDERSTANDING AND USING THE CODE

Our Values – Our Why

WorkPac is proud to be Australia’s largest privately owned provider of workforce services. Our values underpin everything we do. Our values are:

- Respect;
- Responsibility;
- Courage;
- Connection; and
- Valuing People.

Our focus is on conducting our business with integrity, adhering to high ethical standards and requiring those with whom we do business to do the same.

About the Code

WorkPac’s Code of Conduct (**the Code**) represents our commitment to ethical business practices and compliance with legal obligations and is founded on our values.

We believe that by adhering to the Code, we will build and maintain strong relationships with the communities in which we operate and with our employees, contractors, clients, business partners, suppliers and governments.

WorkPac’s Expectations of You

The Code applies to everyone involved in our business, regardless of their role or location.

This includes employees, whether internal or on assignment with a WorkPac client, managers, directors and board members. We also expect contractors and suppliers to follow the Code in connection with the work they undertake with or for us.

It is critical we understand the Code, how it applies to each of us and that we hold ourselves and each other accountable for upholding the Code and the WorkPac Values.

You should:

- (a) Ensure you know and understand the Code;
- (b) Ensure that you comply with the Code, taking care not to rush to get a job done at the expense of compliance with the Code;
- (c) Take reasonable steps to ensure that others who conduct business on behalf of WorkPac, such as contractors, agents, consultants and business partners, know, understand and comply with the Code;
- (d) Never ignore a breach or potential breach of the Code; and
- (e) Immediately speak up about any questions or concerns regarding the Code.

PART B – YOU, OUR PEOPLE

Health and Safety

Health and safety in our workplaces is everyone’s responsibility.

WorkPac is committed to providing safe working environments and to achieving industry leading practices in health and safety where there are no injuries and where you take care of yourself and others.

We have safety policies, procedures and systems in place to ensure that our business and the people in it, are operating in a safe way. If you are undertaking work with our clients, they may also have safety policies,

procedures and systems which must be complied with.

Our expectations of you:

- Present fit for work and able to safely perform your duties. This means not being under the influence of alcohol or drugs, being well-rested, and being physically and mentally fit to perform your role;
- Understand and follow all applicable health and safety policies, standards, minimum requirements, procedures and reasonable and lawful directions that apply to your work. This may include the policies and procedures of a client of WorkPac;
- Perform your work in a safe manner and in accordance with the procedures and standards that apply to your work; and
- Immediately report any safety hazards or unsafe conditions appropriately.

Tools and Resources	Where to Go for Help
<p>Occupational Health and Safety Policy</p> <p>Fitness for Work Policy</p> <p>Fitness for Work Procedure</p> <p>Fatigue Management Procedure</p> <p>Incident Reporting and Investigation Procedure</p>	<p>Your WorkPac Manager (including Area Manager, Business Centre Manager Business Development Manager, Site Manager, Recruitment Coordinator/Consultant) or your on-site Client Supervisor</p> <p>WorkPac Internal Disclosure Hotline</p> <p>Stoptime - WorkPac External Whistleblower Hotline</p> <p>(Please see Contact Details at rear of document)</p>

Diversity and Inclusion

WorkPac is committed to maintaining and developing diversity in its workplaces so that all of our employees are treated in an inclusive, fair and respectful manner. We consider this is the best way to achieve our objectives, enhance our reputation and attract, engage and retain talented employees.

Our decisions on employment, development and promotion are always based on merit. Unlawful discrimination against a person based on a personal attribute unrelated to job performance, such as race, gender identity, sexual orientation, intersex status, physical or mental disability, relationship status, religion, political opinion, pregnancy, breastfeeding or family responsibilities is prohibited.

Our expectations of you:

- Demonstrate fairness and respect in all your dealings. Everyone has a role to play in actively and intentionally behaving with inclusion, collaboration and support in mind;
- Always consider the impact your actions may have on others; and
- Challenge and report any discriminatory or hostile behaviour appropriately.

Tools and Resources	Where to Go for Help
<p>Workplace Equity and Diversity Policy</p>	<p>Your WorkPac Manager (including Area Manager, Business Centre Manager Business Development Manager, Site Manager, Recruitment Coordinator/Consultant) or your on-site Client Supervisor</p> <p>WorkPac Employment Relations Team</p> <p>WorkPac Internal Disclosure Hotline</p> <p>Stopline - WorkPac External Whistleblower Hotline</p> <p>(Please see Contact Details at rear of document)</p>

Workplace Behaviour

WorkPac is committed to providing workplaces that puts the safety and wellbeing of its people first. Any form of bullying, harassment, sexual harassment, victimisation, vilification or discrimination is unacceptable and will not be tolerated.

Reports of inappropriate behaviour will be taken seriously by WorkPac. If it is found that a person has engaged in inappropriate behaviour, then WorkPac will take disciplinary action up to and including termination of employment or engagement.

Our expectations of you:

- Always engage in appropriate behaviour towards others and treat people with respect and dignity;
- Do not engage in any behaviour towards others that constitutes - or has the capacity to be perceived as - harassment, sexual harassment, bullying or discrimination;
- Do not victimise or treat someone less favourably because they raised a concern or issue in the workplace;
- If you become aware of inappropriate behavior in a workplace, take positive action to report it; and
- When participating in a workplace investigation, be honest and cooperative and respect the process and the people involved by keeping the matter confidential.

Tools and Resources	Where to Go for Help
<p>Employee Relations Policy</p> <p>Harassment, Discrimination and Bullying Policy and Procedure</p> <p>Sexual Harassment Policy and Procedure</p> <p>Grievance Resolution Policy and Procedure</p> <p>Managing Performance and Misconduct Procedure - FTMs</p> <p>Managing Performance and Misconduct Procedure - Internal Employees</p> <p>Social Media Policy - FTMs</p> <p>Social Media Policy - Internal Employees</p>	<p>Your WorkPac Manager (including Area Manager, Business Centre Manager Business Development Manager, Site Manager, Recruitment Coordinator/Consultant) or your on-site Client Supervisor</p> <p>WorkPac Employment Relations Team</p> <p>WorkPac Internal Disclosure Hotline</p> <p>Stopline - WorkPac External Whistleblower Hotline</p> <p>(Please see Contact Details at rear of document)</p>

Comply with the Law

WorkPac and its employees must comply with the laws and regulations in each state and territory in which WorkPac operates as a business.

This Code does not describe every law, regulation or requirement that may apply to your engagement with WorkPac. You should make sure you know the rules that do apply to you and comply with those rules. If you have any questions, you must seek advice.

Through this Code and WorkPac’s policies, procedures and practices, WorkPac holds its employees’ accountable for ensuring decisions and actions meet our compliance obligations as well as WorkPac’s values.

Our expectations of you:

- Ensure you complete all ongoing training and education programs relevant to your role to build and maintain awareness of relevant laws, policies, procedures and practices;
- Ensure you understand and comply with all relevant legislation, regulations, WorkPac policies and procedures in the location/s in which you work or which apply to the work you are doing;
- Report any behaviour that you experience or witness that may constitute a breach of any law, regulation or WorkPac policy or procedure;
- Do not victimise or take any adverse action against an employee for reporting breaches of the law or the Code; and
- If you are unsure about a particular law, obligation, policy or procedure, speak up.

Tools and Resources	Where to Go for Help
Whistleblower Policy	Your WorkPac Manager (including Area Manager, Business Centre Manager Business Development Manager, Site Manager, Recruitment Coordinator/Consultant) or your on-site Client Supervisor WorkPac Internal Disclosure Hotline Stoptline - WorkPac External Whistleblower Hotline (Please see Contact Details at rear of document)

Comply with WorkPac’s Policies and Procedures

WorkPac requires all employees, officers and directors comply with WorkPac’s policies and procedures and are individually responsible and accountable for their actions.

Our expectations of you:

- Ensure you understand your responsibilities under the Code and WorkPac’s policies and procedures;
- Take responsibility for the way in which you behave, perform your duties efficiently, honestly, and to the best of your ability and, where appropriate, report the results of your actions;
- Complete all ongoing training and education programs relevant to your role to build and maintain awareness of relevant laws, policies, procedures and practices;
- Raise your concerns if you believe a business conduct is unethical, unsafe or breaches the Code, WorkPac’s policies and procedures or the law; and
- Ensure you understand and comply with all relevant legislation, regulations, WorkPac’s policies and procedures in the location/s in which you work, or which apply to the work you are doing.

Tools and Resources	Where to Go for Help
<p>Employee Relations Policy</p> <p>Grievance Resolution Policy and Procedure</p> <p>Managing Performance and Misconduct Procedure - FTMs</p> <p>Managing Performance and Misconduct Procedure - Internal Employees</p> <p>Whistleblower Policy</p>	<p>Your WorkPac Manager (including Area Manager, Business Centre Manager Business Development Manager, Site Manager, Recruitment Coordinator/Consultant) or your on-site Client Supervisor</p> <p>WorkPac Internal Disclosure Hotline</p> <p>Stoptime - WorkPac External Whistleblower Hotline</p> <p>(Please see Contact Details at rear of document)</p>

Compete Fairly

WorkPac will always act competitively, but fairly, and comply with all applicable competition laws. WorkPac continually strives to initiate competition by providing the best service to its customers, being innovative and increasing efficiencies.

Our expectations of you:

- Keep our commercially sensitive information confidential;
- Compete for clients fairly;
- Don't discuss, make or attempt to make arrangements with WorkPac's competitors about how WorkPac behaves with its clients, suppliers or other competitors;
- Never gather market intelligence other than in a manner that is ethical and in compliance with all laws and regulations;
- Do not engage in an anti-competitive manner when dealing with our clients, business partners and suppliers; and
- Speak up if you suspect any anti-competitive is being taken by any person within WorkPac or against WorkPac.

Tools and Resources	Where to Go for Help
<p>Quality Policy</p> <p>Purchasing Procedure</p>	<p>Your WorkPac Manager (including Area Manager, Business Centre Manager Business Development Manager, Site Manager, Recruitment Coordinator/Consultant) or your on-site Client Supervisor</p> <p>WorkPac Internal Disclosure Hotline</p> <p>Stoptime - WorkPac External Whistleblower Hotline</p> <p>(Please see Contact Details at rear of document)</p>

Avoid Perceived or Actual Conflicts of Interest

It is imperative that the relationships and associations of WorkPac employees do not create perceived or actual conflicts with the interests of WorkPac. This is vital in ensuring WorkPac maintains its reputation as a fair corporate citizen.

A conflict of interest may arise where a person's position within WorkPac, or their financial or other personal considerations or interests affect, have the potential to affect or appear to affect the person's decision-making process, objectivity, judgment or independence. This may include personal relationships with someone else in

the workplace or with a client or supplier.

Our expectations of you:

- Act in the best interest of WorkPac at all times. Avoid business dealings and personal relationships that cause or may cause conflicts of interest or create the appearance of a conflict or potential conflict, with your relationship to WorkPac;
- Avoid activities, personal relationships and business dealings which cause, may cause or give the appearance of a conflict of interest with your relationship with WorkPac;
- Treat everybody in the workplace equally and without bias regardless of personal relationships;
- Don't use your role to gain advantage for yourself or someone you know in a personal capacity;
- Always excuse yourself from any decision-making process where you have an interest that influences, or may be perceived as influencing, your ability to make an objective decision and to fulfil your responsibilities to WorkPac;
- Obtain written approval prior to commencing any secondary employment or any voluntary work that may conflict with or otherwise impact on your ability to perform your WorkPac duties; and
- Disclose any potential, real or apparent conflicts of interest and not act in such circumstances until the matter has been appropriately investigated and resolved.

You must disclose any outside activities, financial interest or any personal relationships that may involve you either in an actual conflict of interest or the appearance of one. WorkPac will review any conflict or potential conflict carefully and work with you with a view to determining the best course of action for both parties.

A failure to disclose any conflicts of interest or a potential conflict of interest will be treated seriously and may be grounds for disciplinary action, including potentially dismissal and termination.

Tools and Resources	Where to Go for Help
Terms and Conditions of Employment	Your WorkPac Manager (including Area Manager, Business Centre Manager Business Development Manager, Site Manager, Recruitment Coordinator/Consultant) or your on-site Client Supervisor WorkPac Internal Disclosure Hotline Stoptline - WorkPac External Whistleblower Hotline (Please see Contact Details at rear of document)

Accepting Gifts, Hospitality and Entertainment

WorkPac is committed to obtaining and undertaking business based on merit, including its proven track record of excellence. Accepting gifts, hospitality and entertainment can be a legitimate way of building good business relationships, however it is important that they are never used to unduly influence business decision-making or cause others to perceive that there has been improper influence.

Our expectations of you:

- Do not offer, make, accept or approve any irregular payment or gift to win business or influence a business decision in our favour - this includes rebates, bribes, kickbacks, secret commissions and like payments. Bribes and other corrupt payments are not only a contravention of this Code, but offering, making or accepting them is a criminal offence;
- Employees, contractors, officers and directors, from time to time, may entertain or be entertained and give or receive gifts in the course of their duties. However, WorkPac requires that gifts, hospitality and

entertainment only be accepted if they are of modest value, occasional and are not provided during or in relation to any tender or bidding process in which we are involved; and

- Consult with your manager where you have any uncertainty about the appropriateness of the nature of any payment or gift.

Supplier Relationships

WorkPac has relationships with many suppliers and all of these relationships play a valuable role in allowing WorkPac to achieve its business goals.

We are committed to having fair procurement processes to ensure potential suppliers are aware of our needs, standards and other applicable requirements.

Our expectations of you:

- Always base procurement decisions on best value, taking into consideration price, quality, performance, history and suitability to our standards; and
- Also assist suppliers to understand WorkPac’s business conduct requirements, including making the Code available to suppliers.

Tools and Resources	Where to Go for Help
Quality Policy	Your WorkPac Manager (including Area Manager, Business Centre Manager Business Development Manager, Site Manager, Recruitment Coordinator/Consultant) or your on-site Client Supervisor

PART C – USING WORKPAC’S RESOURCES

Protecting Our Assets

WorkPac seeks to ensure all its assets are used responsibly and for the best interests of WorkPac. WorkPac has many types of assets in various forms including physical and non-physical property, such as facilities, equipment, funds, intellectual property, confidential information and data.

Commercially or competitively sensitive and proprietary information must be treated as an asset and protected from unauthorised use or disclosure. This may include:

- strategic and marketing plans;
- information used in trading activities;
- list of customers and revenue;
- operational data; and/or
- research and other technical data.

Unless authorised to do so, you must not share any of this kind of information. If you are not sure about what you can share, speak up.

Our expectations of you:

- Use WorkPac's assets for their intended purposes, and not for personal gain. WorkPac understands that reasonable personal use of WorkPac information technology may sometimes be required;
- Protect WorkPac’s assets, both physical and non-physical, from waste, damage, misuse, loss, fraud and theft including ensuring commercially sensitive or proprietary information is protected from unauthorised use or disclosure;

- Report any potential waste, damage, misuse, loss, fraud or theft of WorkPac’s assets;
- Prevent non-authorized employees from accessing WorkPac facilities, information, data or other assets, where possible and safe to do so;
- You should only ever use, or allow to be used, WorkPac assets for the purpose and in the manner intended, with all appropriate and accurate records kept; and
- You should also take appropriate action to ensure that assets of WorkPac or its clients are not stolen, misappropriated, damaged or misused.

Tools and Resources	Where to Go for Help
Privacy Policy Data Breach Response Plan Terms and Conditions of Employment	WorkPac Privacy Hotline WorkPac Internal Disclosure Hotline Stopleveline - WorkPac External Whistleblower Hotline (Please see Contact Details at rear of document)

Protect Confidential and Private Information

WorkPac seeks to ensure that all protection personal and confidential information including client, supplier, and employee information is protected and secured.

Our expectations of you:

- Treat personal and confidential information of others with respect at all times;
- Only collect, use, disclose, retain and process personal information that is necessary for legitimate business activities and functions;
- Any personal information we collect, use, store and disclose must be managed in accordance with our policies, procedures and the law;
- Take care to ensure confidential information is kept secure and ensure you comply with WorkPac’s Privacy Policy and IT Security policies;
- Comply with all legal requirements that apply to the collection, use, disclosure, retention and processing personal information; and
- Respect the confidentiality of WorkPac, the client, supplier and/or employee information acquired in the course of business and not disclose such information without written consent or unless the disclosure is required by law.

Tools and Resources	Where to Go for Help
Privacy Policy Data Breach Response Plan Internet Filtering and Security Policy	WorkPac Privacy Hotline WorkPac Internal Disclosure Hotline Stopleveline - WorkPac External Whistleblower Hotline (Please see Contact Details at rear of document)

PART D – COMMUNITIES AND GOVERNMENTS

Human Rights

WorkPac supports the United Nations' *Universal Declaration of Human Rights* and respects and works to uphold and advance human rights in all aspects of our business. WorkPac acknowledges that our activities may have the potential to impact human rights and we manage this through the WorkPac values and our core business practices.

WorkPac rejects any form of child labour or slavery, including forced labour.

Our expectations of you:

- Be aware and identify any risks that may arise through WorkPac’s business activities; and
- Speak up and report any risks that you identify (whether perceived or actual).

Tools and Resources	Where to Go for Help
<p>National Child Protection Policy</p> <p>Modern Day Slavery Policy</p>	<p>Your WorkPac Manager (including Area Manager, Business Centre Manager Business Development Manager, Site Manager, Recruitment Coordinator/Consultant) or your on-site Client Supervisor</p> <p>WorkPac’s Internal Disclosure Hotline</p> <p>Stopline - WorkPac External Whistleblower Hotline</p> <p>(Please see Contact Details at rear of document)</p>

Engaging with Communities

WorkPac seeks to make positive and sustainable economic, environmental and social contributions in the communities in which it operates.

Our expectations of you:

- Be part of the communities in which we operate, listen to their concerns and respond to their feedback.

Tools and Resources	Where to Go for Help
<p>Community Involvement Procedure</p> <p>Community Relations Policy</p> <p>Environmental and Sustainability Policy</p>	<p>Your WorkPac Manager (including Area Manager, Business Centre Manager Business Development Manager, Site Manager, Recruitment Coordinator/Consultant) or your on-site Client Supervisor</p> <p>WorkPac Internal Disclosure Hotline</p> <p>Stopline - WorkPac External Whistleblower Hotline</p> <p>(Please see Contact Details at rear of document)</p>

PART E – BREACHES OF THE CODE

1.1 Disclose any Breaches or Suspected Breaches of the Code

WorkPac takes compliance with the Code seriously and requires you to comply with the Code’s content and intent.

Our expectations of you:

- Immediately disclose any actual or suspected breaches of the Code or any other matters that may be detrimental to WorkPac or its reputation in accordance with the Whistleblower Policy;
- You are encouraged to make disclosures to your supervisor or Manager in the first instance. If your report relates to a personal work-related grievance, unless it falls under the Whistleblower Policy, it should be raised with WorkPac Employment Relations Team. To receive protections under the Whistleblower Policy, for matters other than personal work-related grievances, you are encouraged to report using Stopline, WorkPac’s external 24/7 service where you can choose to remain anonymous, or another avenue set out under that policy;
- Act reasonably and honestly when making a disclosure and have reasonable grounds to suspect that the conduct being reported has occurred; and
- Participate in any investigation arising out of a disclosure in an honest and cooperative manner and with respect the process and those involved in the process by keeping the matter confidential.

WorkPac is committed to ensuring that you can raise concerns regarding suspected violations of the Code without being subject to victimisation.

Where you report in accordance with the Whistleblower Policy, WorkPac will take steps to ensure that your identity is protected. The person you report to and any other person with knowledge that you have reported must not disclose your identity (for example your name or email address) unless:

- you consent to the disclosure;
- the disclosure is required by law;
- the disclosure is made to the Australian Securities and Investments Commission, the Australian Prudential Regulation Authority or the Australian Federal Police; or
- it is disclosed to a lawyer for the purpose of receiving advice in relation to legal obligations of protection and confidentiality; and
- may only disclose details that may lead to your identification where it is reasonably necessary for WorkPac to investigate a report where reasonable steps are taken to reduce the risk that your identity is disclosed. All disclosures made in accordance with the Whistleblower Policy will be reviewed and where appropriate promptly and thoroughly investigated.

Tools and Resources	Where to Go for Help
<p>Whistleblower Policy</p> <p>Grievance Resolution Policy and Procedure</p>	<p>Your WorkPac Manager (including Area Manager, Business Centre Manager Business Development Manager, Site Manager, Recruitment Coordinator/ Consultant) or your on-site Client Supervisor</p> <p>WorkPac Internal Disclosure Hotline</p> <p>Stopline - WorkPac External Whistleblower Hotline</p> <p>(Please see Contact Details at rear of document)</p>

CONTACT DETAILS

WorkPac Stopline

WorkPac has outsourced the provisions of a confidential hotline to Stopline. Stopline provides many reporting channels for whistleblowers or disclosers, providing protections, anonymity, and confidentiality throughout the process. WorkPac employee reports of wrongdoing to Stopline will be raised with WorkPac Employment Relations Team for appropriate action.

The WorkPac Stopline can be contacted through the below channels. Please provide full details of your report to Stopline including the location of the incident/s, dates and times, full names of the person the report is regarding, and any witnesses.

By **Telephone** (no caller line ID): 1300 30 34 50

By **Confidential Email**: makeareport@stopline.com.au

By **Mail**:
WorkPac
C/o Stopline
PO Box 403
Diamond Creek Victoria 3089

By **Website** or **SmartPhone**: [WorkPac Stopline Online Disclosure](#)
or via the below QR code



Other Important Contacts

If you do not feel comfortable reporting an incident through WorkPac Stopline, or should you wish to receive the protections under the Whistleblower Policy, the following list identifies alternate contact points:

WorkPac Employment Relations Team- Internal Employees WorkPacIR@WorkPac.com

WorkPac Employment Relations Team - FTMs WorkPacER@WorkPac.com

WorkPac Internal Disclosure Hotline Disclosure@WorkPac.com

Whistleblower Committee Members:
General Counsel
Chief Commercial and Risk Officer

WorkPac Privacy Hotline Privacy@Workpac.com