

# North East Link Project – Primary Package

## Steering Committee Paper

Subject of Paper	Code of Conduct Procedure - Updated		
Document Number	MSP103-NEL		
Paper Type	For Decision <input checked="" type="checkbox"/>	For Discussion <input type="checkbox"/>	For Information/Noting <input type="checkbox"/>

## Document Approval

Rev	Date	Prepared by	Reviewed by	Approved by	Approved by
0	30/03/2022	Sophie Brash	SLT	Roman Garrido Project Director	Marco Assorati Managing Director
1	17/05/2022	Sophie Brash	SLT	Roman Garrido Project Director	Marco Assorati Managing Director
<b>Approval Signature</b>					

## Executive Summary

This Code sets out the requirements and standards of behaviour we require across the Spark North East Link Primary Package (The Project) D&C Contract.

## Appendix

Please refer to Appendix 1 for the Code of Conduct Procedure.

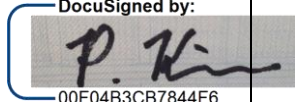


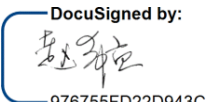
## Recommendation

SteerCo to endorse the Code of Conduct Procedure.

## Steering Committee / JV Parent Company Endorsement

This Board Paper will be deemed approved when one signature is obtained from one representative of each JV Partner as per art 10.1 (i) of the JV Deed.

Signatures of the Steering Committee Members:

			
Andrea Galati <b>Webuild: Member</b>	Don Johnson <b>CPB: Member</b>	Jinheon Kim <b>GS: Member</b>	Colin Cao <b>CCO: Member</b>
			
Richard Graham <b>Webuild: Member</b>	Michael Kalinowski <b>CPB: Member</b>	Jay Lee <b>GS: Member</b>	Ximeng Zhao <b>CCO: Member</b>

## Appendix 1 – Code of Conduct Procedure (Revised)






## SPARK NEL Primary Package

### Project Management System Procedure

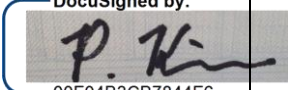
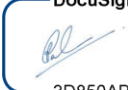
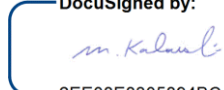
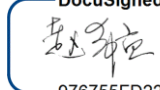
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## MSP103-NEL Code of Conduct

#### Approval Record

Function	Position	Name	Signature	Date
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Reviewed By:	HR Manager	Brett McKeown	<small>Signed by:</small>  <small>F307F9519C9C2EB9</small>	
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Approved By:	Project Director	Roman Garrido		
Approved By:	Managing Director	Marco Assorati		

### Steering Committee / JV Parent Company Endorsement

		DocuSigned by:  00F04B3CB7844F6...	
Andrea Galati <b>Webuild: Member</b>	Don Johnson <b>CPB: Chairperson</b>	Jinheon Kim <b>GS: Member</b>	Colin Cao <b>CCO: Member</b>
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Richard Graham <b>Webuild: Member</b>	Michael Kalinowski <b>CPB: Member</b>	Jay Lee <b>GS: Member</b>	Ximeng Zhao <b>CCO: Member</b>

### Amendment Record

Date	Rev	Amendment Description
16/05/2022	0	Initial Issue
12/10/2023	1	Whistleblower details updated

### Terms and Definitions

Term	Definition
The Project	Spark North East Link Design & Construct Project
Joint Venture Parent Company/Companies	CPB Contractors, GS Engineering & Construction, Webuild, China Construction Oceania (CCO).
Employees	All people who work for the Project as an Employee, contractor, employees or associates of contractors, director, or officer.
Unacceptable Work Behaviour	This involves bullying, harassment, unlawful discrimination, vilification, occupational violence, and victimisation.
Unlawful Discrimination	Is when an individual is treated differently or isolated from a group because of their gender, sexual orientation, gender identity, intersex status, race, disability, age, religion, social origin, political opinion, pregnancy, and family/carer's responsibility.
Vilification	Is any public act that does or could incite or encourage hatred, serious contempt, or severe ridicule towards people for reasons such as their race, descent, national or ethnic origin or immigrant status.
Victimisation	Is treating a person unfavourably because they either intend to make a complaint or is helping their colleague with a complaint.

# CODE OF CONDUCT

## Project Management System Procedure

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Harassment	Is when a person is treated less favourably based on certain personal characteristics.
Sexual Harassment	This involves any unwanted or unwelcome sexual behaviour that could make a person feel offended, humiliated, or intimidated.
Bullying	Is an ongoing and deliberate misuse of power in relationships that intends to cause physical, social and/or psychological harm.
Direct Bullying	Consists of oral/physical abuse and threats.
Indirect Bullying	Consists of actions that can inflict psychological harm.

### Abbreviations and Acronyms

Abbreviation and Acronyms	Definition

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### 1. Purpose and Scope

This Code sets out the requirements and standards of behaviour we require across the Spark North East Link Primary Package (The Project) D&C Contract.

This Code applies to all relevant persons including Employees of the Joint Venture (JV) Parties, and all third- party Employees and associates engaged by the JV in all jurisdictions, other workers and visitors.

Any person found to have breached this Policy may be subject to disciplinary action. We

expect you to:

- Act in accordance with this Code and all other policies, procedures and requirements relating to proper business and interpersonal conduct.
- Comply with all policies and procedures.
- Comply with all applicable laws wherever we operate.
- Seek advice if you have any doubt about the right course of action.

Where this Code or a Policy sets higher standards of behaviour than local laws, rules, customs or norms, the higher standards will apply.

The Code provides a framework, but cannot describe every situation, law or policy that may apply to you. You need to exercise good judgement, justify your actions, and try to prevent any potential breaches.

Before you make a decision, try this test:

- Does it comply with this Code?
- What would your family, colleagues or manager think about your decision?
- How would you feel if your decision was reported in the media?
- Would you be confident explaining your actions to senior management or external authorities?
- How would your behaviour be viewed in one or five years from now?
- Would you be happy if you were treated this way?

If you are in doubt about the right thing to do, you should raise your concern with your Manager, or other contacts outlined in this Code.

With regard to any potential breaches of the Code, policies or laws you must:

- Immediately raise known, or suspected, breaches.
- Cooperate in investigations of possible breaches.
- Support anyone reporting a breach.

The JV monitors compliance with the Code, and all reported breaches will be investigated. If a breach is found to have occurred, we will take appropriate action, which may include dismissal and reporting to appropriate authorities.

## 2. Process

### 2.1 Whistle-Blower Protection

All business concerns raised are taken seriously and treated confidentially, and the identity of the Whistle-blower who has raised an eligible disclosure to an eligible recipient is only revealed on a 'need-to-know' basis. All Whistle-blowers have the option to do so anonymously or on the basis that their identity will be known only by the individual to whom the disclosure was raised or the relevant Ethics Line provider.

Any Whistle-blower who feels they have been victimised after raising a concern should contact their HR department, or one of the following Ethics Line applicable to your organisation:

Operating Company	Contact Information or Link
Spark NEL D & C	<b>Stopline Site:</b> <a href="https://sparknel-dc.stoplinereport.com/">https://sparknel-dc.stoplinereport.com/</a> <b>Telephone:</b> 1300 30 45 50 <b>Email:</b> <a href="mailto:makeareport@stopline.com.au">makeareport@stopline.com.au</a>
CPB Contractors	<b>Telephone:</b> +61 3 9811 3262 <b>Free call:</b> 1300 817 574 <a href="mailto:contractors@stopline.com.au">contractors@stopline.com.au</a>
Webuild	<b>Integrity Platform Site:</b> <a href="https://webuild.integrityline.io/">https://webuild.integrityline.io/</a>
GS Engineering & Construction	<b>Reporting Ethical Violations Site:</b> <a href="https://www.gsenc.com/en/Customer/CustomerSinmungoWrite.aspx">https://www.gsenc.com/en/Customer/CustomerSinmungoWrite.aspx</a>
China Construction Oceania	<b>Email:</b> <a href="mailto:Human.Resources@sparknel-dc.com.au">Human.Resources@sparknel-dc.com.au</a>

The Project will not tolerate victimisation of a Whistle-blower. Any Employee found to have victimised another will be subject to disciplinary action.

#### 2.1.1 Confidentiality is Respected

All business concerns raised are taken seriously and treated confidentially. When you raise a concern, your identity and the information will be shared only on a 'need-to-know' basis to address the concern, as required by law, or otherwise with your consent.

#### 2.1.2 Safeguarding Against Victimisation

The Project does not condone any form of punishment, disciplinary or retaliatory action and/or behaviour being taken against anyone for raising or helping to address a genuinely held business conduct concern. Victimisation is grounds for disciplinary action, including termination of employment.

Should an employee feel that they have been subjected to victimisation by the Project following raising such a concern, they should contact their JV parent company HR representative or Ethics Line and such concerns will be addressed accordingly.

#### 2.1.3 Investigations and Disciplinary Action

All suspected, or actual reported breaches of this Code will be treated seriously and investigated. Following an investigation, where the Project is satisfied that a breach of this Code has occurred, disciplinary action may be

taken. Failure to behave in the ways described in the Code may lead to action under relevant performance management and/or disciplinary action procedures.

Where a minor breach of the Code has occurred, the nature of any disciplinary or other action will be determined by relevant management, in consultation with the Project HR department.

Conduct which is subject to disciplinary may also include:

Not taking the necessary care to report a violation;

Failing to cooperate with an investigation or destruction or withholding of relevant evidence or information for an investigation or providing false, incomplete or misleading information;

Attempting to retaliate against a person who has reported, in good faith, a suspected violation or who is cooperating with an investigation.

### 2.1.4 Questions about the Code

If you are unsure about what any part of the Code means, have any concerns about how you should behave in a particular circumstance, or would like to report a potential breach you should:

- Immediately speak to your Manager, or
- Where this is not possible (e.g., your concern involves your Manager), speak with your Manager once removed (i.e. your Manager's Manager), or
- Contact your HR Representative, or
- Contact the relevant Parent Company contact/Ethics Line applicable to your organisation as outlined in Table 1

## 2.2 People

### 2.2.1 Health and Safety

The provision of a safe and healthy working environment for all Employees and those under the Project's care is vital.

You must be observant of safety issues and comply with all applicable rules, laws and regulations.

### 2.2.2 Working with one another

The Project is committed to:

- Providing a safe, supportive and positive working environment where Employees are treated fairly and with respect.
- Developing and maintaining a diverse and inclusive workforce.

The Project does not tolerate harassment, discrimination, bullying, vilification, occupational violence, or victimisation on any grounds, whether by race, gender, sexual preference, marital status, age, religion, colour, national extraction, social origin, political opinion, disability, family or carer's responsibilities, or pregnancy.

All Employees must:

- Act in accordance with the Project's standards, frameworks (or equivalent) and processes applicable to the Project.
- Not engage in unacceptable workplace behaviour by acting inappropriately which includes:

- Offensive conduct or remarks directed at a person, or group.
- Generating or distributing material that is generally offensive.
- Sexual harassment.
- Comply with the Equity, Diversity and Inclusion Policy.

To ensure a safe and friendly work environment, free of harassment, bullying and discrimination, it is expected that all Employees:

- Be respectful and courteous.
- Act in a safe manner and adhere to the safety rules.
- Do not engage in actions or behaviours that involve victimisation, vilification, bullying or harassment of others.
- Do not engage in actions or conduct that a reasonable person would find unwelcome, humiliating, or offensive, including verbal and physical abuse, or using inappropriate language in the workplace.
- Be aware of and respect cultural differences.
- Take all reasonable steps to respect the Project's ownership of all its property, including funds, facilities, equipment, supplies, records and information.
- Maintain the confidentiality of information, records or other materials acquired during employment, both during and after employment or engagement with the Project.
- Do not abuse the advantages of employment or engagement for personal purposes.

All Managers must:

- Take all reasonable steps to ensure compliance with policies and procedures.
- Encourage a work environment that fosters inclusion and respect.
- Respect principles of diversity and equal employment opportunity in making decisions.
- Intervene appropriately to prevent or address unacceptable workplace behaviour as described by this Code, including appropriately reporting incidents.

When dealing with a complaint, Managers must:

- Treat all complaints seriously, confidentially and take appropriate action in response to complaints in accordance with this Code; and
- Take all reasonable steps to ensure that individuals who make complaints or provide evidence against others who breach Project policies and procedures or the law, are not victimised as a result of having reported such conduct.

### 2.2.3 Freedom of Association

The Project respects and protects all employees' and subcontractors' rights to freedom of association and the rights of workers to lawfully and peacefully associate, organise and bargain collectively. The right to freedom of association means that employees and subcontractors are free to join or not to join industrial associations of their choice and that they are not to be discriminated against, coerced, or victimised in any way, on the basis of union membership or non-membership.

"Discriminated" in this context is defined to include: any disciplinary intervention, including termination of employment; a refusal or delay in hiring; the allocation of work in any way other than on merit; and any refusal or failure to provide training or career progression other than based on opportunity and merit).

### 2.3 Privacy

The Project regards the fair and lawful treatment of personal information with utmost importance. You must always respect the privacy of other people and comply with applicable privacy laws.

In this respect, you must only:

- Collect and use personal information that is necessary for business purposes.
- Collect personal information by lawful, fair and unobtrusive means.
- Collect sensitive information with the individual's consent, where necessary.
- Disclose information to third parties with consent or where required by law to do so.

Given the complexities of laws and regulations in relation to privacy, if you have any doubt about the handling of personal information, consult a Project HR representative and/or member of the Legal team on the Project.

Employees should be aware that private information collected by members of the Project may have to be released to third parties when required under law.

### 2.4 Stakeholders

#### 2.4.1 Environment

The Project is committed to undertaking business activities in a manner that respects the environment and contributes to the sustainability of our business.

You must:

- Take responsibility for meeting applicable environmental laws, regulations and contractual obligations.
- Prevent adverse environmental impacts.
- Respond to and report any environmental incident.
- Comply with all applicable rules, laws and regulations.

#### 2.4.2 Community

The Project understands that, wherever we operate, we potentially impact the local community. We are committed to building relationships and working collaboratively with the communities in which we work.

You must take a socially responsible approach to our business, respect the interests of our local communities, implement, and comply with all relevant policies and procedures.

#### 2.4.3 Sponsorships and charitable donations

The Project may support local community groups and charities through sponsorships and donations that are legal, ethical, and further the interests of the Project.

When considering Project sponsorship and donations, Employees must comply with the Project Delegations of Authority.

#### 2.4.4 Rejection of child labour

The Project does not tolerate child labour or any form of exploitation of children or young people and will comply with the International Labour Organisation (ILO) with respect to under-age workers.

### 2.4.5 Rejection of modern slavery

The Project rejects all forms of slavery including but not limited to trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage and deceptive recruiting for labour and services. No Employee, Contractor and/or Supplier may be obliged to work by the direct or indirect use of force and/or intimidation. Only people who voluntarily make themselves available for work may be employed.

The Project is committed to managing all aspect of its operations and supply chains to assess and address risks of modern slavery in accordance with the Australian Modern Slavery Act (2018).

## 2.5 Working Practices

### 2.5.1 Bribery and corruption

The Project prohibits, and has zero tolerance for, all forms of bribery and corruption. You must:

- Obey all relevant laws and regulations
- Be aware that gifts and hospitality, agency arrangements, political donations and charitable contributions may, in certain circumstances, constitute, or give, the appearance of bribery and as such need to be carefully considered so that this does not occur.
- Report corruption activities and/or requests for any improper payments such as bribes or facilitation payments to your line manager without delay.
- If you have any doubt about the legitimacy of a payment or gift that you have been requested to make, immediately notify your line manager, and seek the advice from a member of the Project HR team.
- Communicate the requirements of the Project to subcontractors, suppliers and other business partners.
- Ensure all transactions are accurately recorded in reasonable detail in line with Project practices and procedures.
- Plan against circumstances where bribery or corruption may occur.

You must never:

- Participate in any arrangement which gives any person an improper benefit in return for an unfair advantage to any party, directly or through an intermediary. This includes facilitation payments (payments of cash or in kind made to secure or expedite a routine service, or to 'facilitate' a routine Government action), even if allowed under local laws or customs.
- Authorise undertake or participate in schemes to give any improper benefit, kickback or secret commission to anyone.
- Offer, promise, or give a cash or cash equivalent payment of any kind to a government official or to any other person for the purpose of obtaining improper advantage.
- Use any third party to do something that the Project is prohibited from doing itself.
- Give anything of value to any third party when there is any suspicion that the third party, will engage in bribery, corruption, or other prohibited conduct in relation to the Project.

### 2.5.2 Gifts and hospitality

Gifts or hospitality are only to be offered or received for a legitimate business purpose and consistent with generally accepted business courtesy standards – that is, if their primary objective is to build a good business relationship, and that relationship is consistent with the business plan of the relevant business unit. Gifts or hospitality that are reasonably considered to impair effective judgement, improperly influence a decision or create a sense of obligation must not be offered or accepted by any Employee.

The following gifts or hospitality (each being a **Prohibited Gift / Hospitality**) are prohibited in all circumstances:

- Cash or gift vouchers, except those which are expressly permitted under other Project policies and the relevant pre-approval stipulated in that policy has been obtained.
- Gifts or hospitality given or received with the intention of unduly influencing business decisions.
- Hospitality of an inappropriate nature or at inappropriate venues.
- Gifts or hospitality in exchange for business services or information, loans, cash or product/ service discounts not available to all Employees.
- Facilitation payments, even where allowed under local jurisdictional laws or business practices.

The Gifts and Hospitality Procedure sets out where prior written Project Director approval is required before receiving or arranging to provide any non-prohibited gift or hospitality, and the gifts or hospitality that an Employee has received or arranged that must be recorded. The table below outlines the schedule of amounts where approval is required.

Item / Event	Examples	Amount AUD (per person)	Requirement to record	Obtain prior PD approval
Gifts	Gifts offered or received	\$0 - <\$100	No	No
		\$100 and <\$250	Yes	No
		\$250 - \$1,000 cap to the maximum value of the gifts/hospitality allowed	Yes	Yes
Hospitality (offered or received)	Lunch, dinner or sporting event / concert / benefit	\$0 - <\$100	No	No
		\$100 and <\$250	Yes	No
		\$250 - \$1,000 cap to the maximum value of the gifts/hospitality allowed	Yes	Yes
Supplier Events (Accepting invitation)	Attendance at supplier event (within Australia, excluding travel)	\$0 - <\$100	No	No
		\$100 and <\$250	Yes	No
		\$250 - \$1,000 cap to the maximum value of the gifts/hospitality allowed	Yes	Yes
Project Group events - travel or accommodation	Invitations to clients or business partners etc. offering travel or accommodation	Any amount	Yes	Yes

### 2.6 Working with Third Parties

Subcontractors and other third parties with whom the Project works can make a significant contribution to our success. We aim to have effective business relationships with subcontractors and other third parties, and to encourage them to adopt similar business principles, practices and procedures to those of the Project.

Before entering a commercial relationship with a third party on behalf of the Project, appropriate due diligence must be conducted including:

- All engagements with third parties must be for a legitimate purpose and in the best interests of the Project.
- Selection processes must achieve value for money and avoid conflicts of interest.
- Appropriate enquiries (due diligence) must be carried out on all third parties prior to formal engagement.
- The Project's procurement and work tendering policies must be followed in accordance with the Project Delegations of Authority.
- A written contract must be signed before works, supply or services commence and only entered into with all necessary approvals in accordance with the Project Delegations of Authority.
- All contracts must be approved in accordance with the Project Delegations of Authority.

All contracts must:

- Reflect the entire agreement between the Project and the third party.
- Describe in a transparent manner and with an appropriate amount of detail the services and/or goods to be provided.
- Contain terms that provide a clear link between, and are commensurate with, the provision of goods or services and the payment of a fee or charge.

Records must be kept of due diligence, approvals and contracts in accordance with Project standards and procedures. Any non-compliance with these requirements will require the prior approval of the Project General Counsel and Project/Managing Director.

### 2.7 Conflicts of Interest

You must ensure your personal activities and interests do not conflict with your responsibilities to the Project. It is important to avoid even the appearance of a conflict of interest.

You must:

- Disclose to your Manager any existing or potential conflict of interest that affects you.
- Avoid any dealings or relationships that may create a conflict with your obligations to the Project.
- Not be involved in any decision-making where you may not be able to make an objective decision.
- Not be directly involved in the potential or actual employment of a relative, close friend or associate.

### 2.8 Insider Trading

You must not use any information about the Project, a competitor, joint venture partner, customer or supplier for financial or other personal benefit, or convey this information to others before it becomes public.

Where the Project has a business relationship with another company, you should exercise caution if you wish to trade in that company's securities, since the same insider dealing rules apply. Investments in securities of a company with which the Project does business may also give rise to an actual or perceived conflict of interest. The Project does not permit or condone employees using inside information to engage in insider trading on the Project or any other entity.

It is an offence in many jurisdictions to use inside information to buy, sell or otherwise deal in securities, to get another person to do so or to communicate inside information.

You must not:

- Use inside information to buy, sell or otherwise deal in securities of any other entity.
- Advise or encourage another person (for example, a family member, a friend or family company or trust) to undertake trading using inside information or pass such information to another person if you know, or ought to know, that he or she may use the information to deal in securities.

Where the Project has a business relationship with another company, you should exercise caution if you wish to trade in that company's securities, since the same insider dealing rules apply. Investments in securities of a company with which the Project does business may also give rise to an actual or perceived conflict of interest.

### 2.9 Anti-Competitive Conduct

The Project is committed to the principles of free and fair competition. The Project will always compete vigorously but fairly and comply with all applicable competition laws.

You must maintain the independence of the Project and avoid anti-competitive conduct.

### 2.10 International Trade Controls

The Project will comply with all applicable national and international laws, regulations and restrictions relating to the movement of materials and services.

### 2.11 Assets

Assets that belong to the Project must not be used for illegal purposes, or for purposes that are not related to Project business.

You must:

- Only use Project assets for business purposes, unless you have appropriate authorisation.
- Take care to prevent waste, loss, damage, misuse, theft or misappropriation of assets.
- Comply with applicable policies and laws regarding the use and transfer of assets (including applicable delegated authorities).
- Respect the assets of others, whether physical or intangible (for example, intellectual property and confidential information).
- Use of company assets requires Project Director authorisation.

### 2.12 Records

The Project will comply with all applicable rules, laws and regulations governing business reporting.

All information created and maintained as a result of the Project's business activities must accurately reflect the underlying transactions and events and follow Project reporting policies and procedures.

Financial officers and others responsible for the accuracy of financial reporting have an additional responsibility to ensure that adequate internal controls exist to achieve truthful, accurate, complete, consistent, timely and understandable financial and management reports that are prepared in accordance with relevant laws, accounting standards, policies, and procedures.

### 2.13 Communication

#### 2.12.1 Governments

The Project conducts business with governments in all areas of its operation and seeks to have open and constructive relationships with those governments. Any interactions with governments, regulators and public authorities must be in the best interests of the Project and information provided must be accurate and appropriate.

You must:

- Follow the Project rules that set out who is responsible for communicating with governments, regulators and public authorities.
- Ensure that all interactions with governments, regulators and public authorities are in the best interests of the Project and adhere to high standards of ethics and comply with the letter and spirit of the law.
- Ensure that all information provided to governments, regulators and public authorities is accurate and appropriate. Errors or omissions may damage the reputation and credibility of the Project and could be illegal.
- Cooperate with every legitimate government request for information in accordance with tendering or contractual obligations or with regulatory investigations, while protecting the Project legal rights.

All regulatory investigations involving the Project must immediately be reported to the Legal representative for the Project.

Speak to your Supervisor, Manager, or a member of the Communications & Community Engagement team if you have any questions regarding your interaction with government.

#### 2.12.2 Political contributions and activities

The Project will comply with all applicable rules, laws and regulations in relation to its activities in connection with political parties.

It is important to note that, in order maintain the highest level of neutrality, the Project does not pay any sums or give any gifts to any political and trade union organisations (political parties, political movements, committees, etc.) or to any of their representatives.