

## Policy Statement

The *Employee Code of Conduct Policy* outlines SPC's commitment to a safe, harmonious and professional working environment, free of discrimination, bullying and harassment.

Any SPC employee who reports a genuine breach of this policy will have their complaint dealt with fairly, appropriately, confidentially and in a timely manner.

For guidance on how to deal with complaints raised in relation to breaches of the *Employee Code of Conduct*, staff and management should refer to SPC's *Disciplinary Policy and Procedure*.

### Message from the CEO and Chairman

How we do business with each other, our customers and suppliers is fundamental to how we globalise and develop our business, both in Australia and internationally.

Our core values and behaviours underpin and support everything that we do. It is our expectation that everyone demonstrates the SPC values, they have significant meaning to us, and we expect that this will be the same for you.

Please read the following policy and let it guide you in the ways in which we work and act at SPC.

## Our Values

- Safety First
- Open for business
- Roll up your sleeves
- Risk-smart
- Care about our communities and environment
- Agility and speed

## Scope

This policy applies to all employees, visitors, and The SPC *Employee Code of Conduct* applies to all employees, including full-time, part-time, fixed term, seasonal and casual.

All persons who work at the direction of, or on behalf of SPC (including agents, contractors, subcontractors, consultants, and temporary staff) are also covered by this code.

## Definition

**Harassment** is any type of behaviour directed towards another person that has the potential to offend, embarrass or intimidate. The behaviour becomes harassment when one of the parties involved does not welcome the attention from the other. The intention behind the behaviour is irrelevant.

**Workplace Bullying** is any behaviour where a person or group of people repeatedly act unreasonably towards others, and where the behaviour creates a risk to health and safety. Bullying may involve behaving aggressively, teasing or practical jokes, pressuring someone to behave inappropriately, excluding someone from work-related events, or unreasonable work demands.

**Discrimination** is any type of behaviour that targets an individual or group and treats them differently because of reasons such as race, gender, sexuality, pregnancy, marital status, disability, age or their association with others. The behaviour can be verbal, non-verbal, physical or visual. It can be an isolated incident or repetitive in nature. It can be intentional or unintentional.

## Responsibilities

### All SPC employees and associates

- Respect the rights of others
- Act with honesty and integrity
- Comply with the standards set out in this *Employee Code of Conduct*
- Refrain from involvement in inappropriate behaviour
- Report inappropriate behaviour witnessed in others
- Follow SPC policies and procedures
- Consider your actions (is it legal? Is it consistent with SPC's values? Will it reflect positively on the organisation?)
- Take appropriate care for the health and safety of yourself and others
- Comply with legal requirements and industry guidelines
- Do no harm to the reputation of SPC
- If in doubt, ask for guidance

### People Leaders

- Ensure that the people they supervise understand their responsibilities under the *Employee Code of Conduct*
- Set an example for their team by applying and upholding SPC's standards
- Create an environment where team members feel comfortable to raise concerns
- Act immediately upon receipt of any complaint or of witnessing an event that may constitute a breach of this policy

### Human Resources Department

- Educate managers and staff on *Employee Code of Conduct* policy content and intention
- Assist management and staff during a complaint procedure and investigation process

## SPC Company Standards

### Employment practices

SPC is committed to equal employment opportunity, and creating a workplace free from discrimination, harassment or intimidation. Allegations of behaviour in contradiction to this will be promptly investigated.

A healthy and safe workplace is paramount at SPC. Being under the influence of alcohol or illegal drugs will not be tolerated. Employees should declare to their Manager if they are taking prescription or over-the-counter medication that could impact their ability to carry out the function of their role in a safe manner. For more information, employees should refer to SPC's *Drug and Alcohol Policy*.

## Fraud and corruption

SPC employees must not:

- use their position for personal enrichment, or the enrichment of others through the deliberate misuse of company resources or assets
- partake in bribery, where an advantage is given or taken to encourage a desired action that is illegal or unethical
- give or receive benefits that are not legitimately due, or that are excessive or otherwise not appropriate.

## Conflict of interest or duties

Employees should avoid situations where their private or professional interests or duties conflict with their obligations to SPC. Investments or decisions should be avoided that could affect, or appear to affect, their decision making on behalf of the company.

A conflict of interest may also occur where an employee works directly with a family member or close friend, or a person with whom they have a personal relationship with.

## Undertaking other work

Employees may undertake other paid or voluntary work, as long as it does not:

- affect the quality of their work at SPC
- create a conflict of interest
- use SPC resources without approval

## Gifts and entertainment

Gifts, meals or entertainment given to our customers or suppliers must support our legitimate business interests and should be reasonable and appropriate.

Employees must not accept a gift if it compromises (or appears to compromise) themselves or SPC. If offered a gift or entertainment, employees must have this gift recorded if valued over \$100.

## Using SPC resources

You must follow SPC's policies and procedures for using and looking after company resources. Generally, you cannot use SPC resources for personal gain or to compete with the company, nor should you allow others to do so.

## Environment

SPC is committed to operating in an environmentally responsible manner and identifying risks to the environment that may come about through its operation.

If an employee is aware or suspicious of a workplace action that is in breach of this standard, they should refer to section 8 of this *Employee Code of Conduct* for advice on how to raise a concern.

## Media statements / social media

Written approval from the CEO should be obtained prior to making any public comment. This includes comments through any form of media (including, but not limited to, radio, television, online, print, public presentations).

Employees must be careful about comments that they contribute through social media streams, ensuring that comments do not:

- harm the reputation of SPC, its employees, products, clients or suppliers
- reveal any confidential or sensitive information that relates to the business or its employees
- represent the opinions of the organisation or other employees
- cause offence
- contradict the behaviours expected of SPC employees under the *Employee Code of Conduct*.

## Financial and business records

All employees are responsible for ensuring the accuracy of SPC's records, including business and financial records, quality reports, time records and expense reports.

Records should accurately reflect SPC's assets, liabilities, revenues and expenses. All transactions, estimates and accruals should be supported by appropriate documentation and at no time be falsified. Recording of revenue and expenses should not be delayed or accelerated in order to meet budgetary goals.

## General law and regulations

At all times, you must endeavour to understand the laws, regulations and industry practices that are relevant to your work and keep up to date with changes.

When operating in an offshore environment you must ensure that your actions in dealing with Governments are in compliance with the Bribery of Foreign Public Officials Act 1999.

## Information Privacy

Do not disclose non-public information to anyone outside of SPC, including family and friends, unless it is required to do so for business purposes.

Take appropriate steps to protect information at all times, this includes retaining and discarding records in accordance with the requirements of the country in which you operate.

Should you leave SPC, you must not disclose any confidential information about the company that you acquired while in their employment, including (but not limited to) procedures, financials, trade secrets, customers and stakeholders.

Refer to SPC's Privacy Policy for guidance on the handling of data.

## Consequences of breaching the code

A breach of the *Employee Code of Conduct* policy may result in disciplinary action ranging from counselling to immediate termination of employment without any prior notice or payment in lieu.

Disclosure of confidential company information may leave employees (or former employees) liable to legal action.

## Raising concerns

If you observe behaviour that may violate the *Employee Code of Conduct*, raise the issue immediately. This allows SPC the opportunity to deal with the issue and correct it before it becomes a violation of law or a risk to employee safety, security or company reputation.

SPC has a Whistleblower Protection Policy to ensure that employees reporting concerns are protected and not disadvantaged in any way. SPC will protect any employee who raises a concern honestly. Your concern doesn't have to be confirmed, but you must believe that the information provided is accurate. It is a violation of the Code to make a false accusation, lie to investigators, interfere or refuse to cooperate with a Code investigation.

In instances of a grievance (complaint), SPC's Grievance Policy and Procedure should be followed. This policy includes formal and informal procedures to resolve the complaint effectively and equitably.

## Related policies

- Gifts Policy
- Privacy Policy
- Grievance Policy
- Whistle-blower's Protection Policy
- Drug and Alcohol Policy

Approved by Neil Brimacombe



Chief Executive Officer

16 January 2024