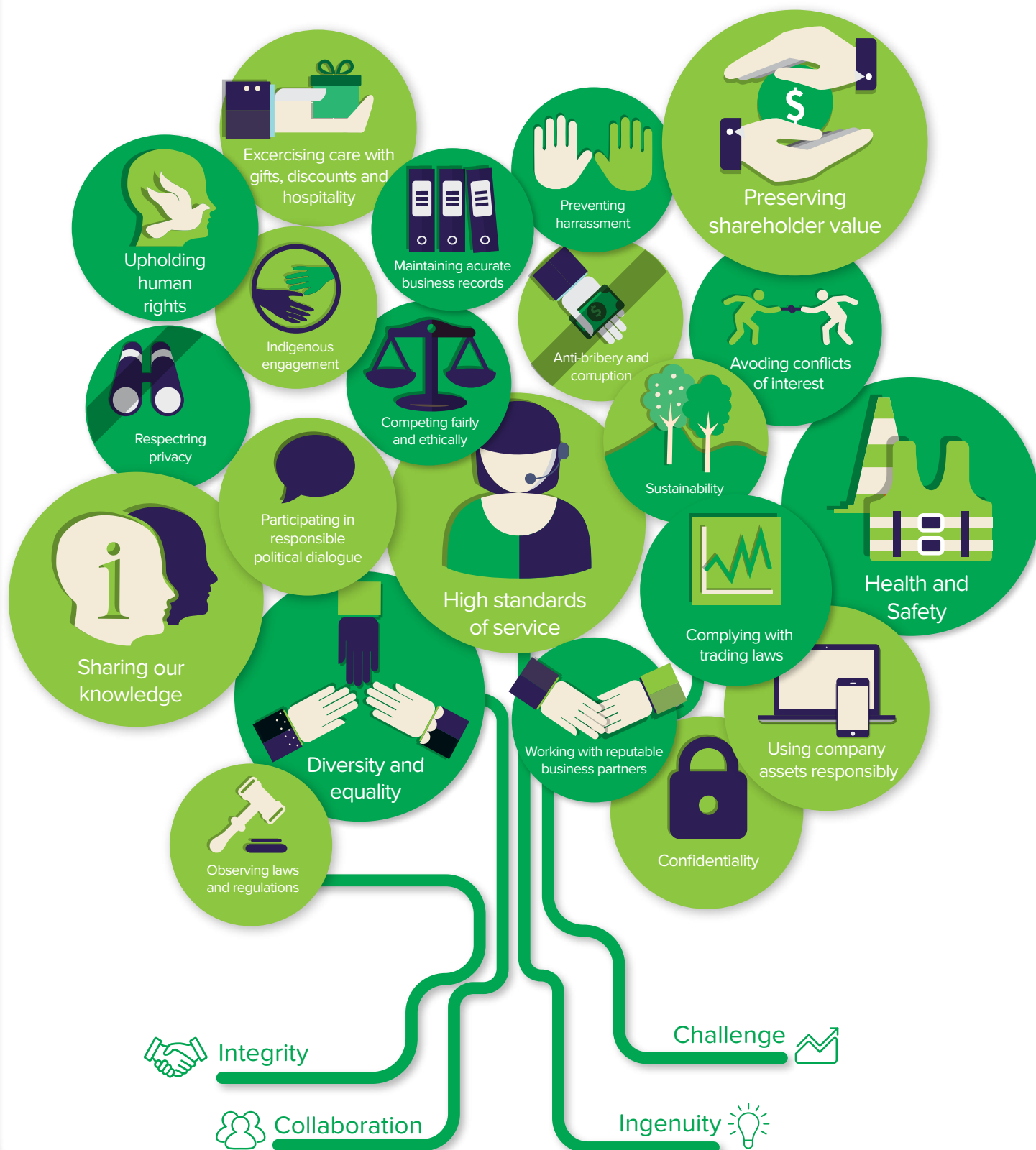




# Code of Business Conduct





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## Our business

Workforce of 25,000 | 9 Countries | 200+ Clients



## Our services



Logistics  
and Facilities  
Management



Consulting



Care and  
Welfare



Construction



Operations  
and  
Maintenance



Well  
Servicing

## Our sectors

- Utilities
- Telecommunications
- Transport
- Defence
- Social
- Property
- Oil and Gas
- Resources
- Industrial

## Our brands



# Message from the Managing Director and Chief Executive Officer

Broadspectrum is a global company with a workforce of 25,000 employees.

For a Company of our size and diversity, it is critical to have a clear and consistent standard of behaviour, both for work within the organisation, and with external stakeholders, including clients, service providers, suppliers and the communities where we work.

The Code of Business Conduct (Code) is our one global standard, and is essential reading for all Broadspectrum employees.

It is our behavioural guide - a single reference point to ensure we work safely, behave ethically, and abide by laws and regulations with every work decision, task and interaction.

The Code is applicable to all of us, irrespective of where we work, and the task we perform.

You will notice that the Company's four values - Integrity, Collaboration, Challenge and Ingenuity - feature prominently throughout the Code's principles. They are the behavioral pillars we should all aspire to.

Significant consultation has been undertaken with the business to ensure the policies supporting the principles are relevant and accurate.

We also have ongoing training programs and formal processes in place to ensure all employees are familiar with the Code.

In any case, please keep a copy to hand. And, if you manage a team, ensure the Code is easily accessible.

We are all part of the one Broadspectrum team, and the Code is essential for us to achieve our strategic intent and support our values.

Where you have a question on the application of the Code, please discuss it with your manager or contact the Compliance and Governance Group at: [codeofconduct@broadspectrum.com](mailto:codeofconduct@broadspectrum.com)

Thank you for your commitment and support.

**Graeme Hunt**  
**Managing Director and Chief Executive Officer**



## Structure of the Code

The Code of Business Conduct promotes specific **CONDUCT PRINCIPLES** within each of our Values, which guide policies, programs and training initiatives across Broadspectrum, the most significant of which are referenced in this document.

The content of the Code is not intended to cover all possible situations. It is a reference guide to minimum appropriate levels of behaviour at Broadspectrum, and stricter rules may apply in certain situations.

Where circumstances arise that are not covered by this Code, employees are encouraged to review related policies and procedures, and seek guidance from their managers/supervisors, human resources personnel or the Compliance and Governance Group.

Broadspectrum is committed to training and communication in relation to our Values, this Code and related policies and procedures to ensure they are implemented in the day-to-day tasks engaged in by employees and our Business Partners.



### Integrity Do what's right

- ▶ we care for each other's well-being and safety
- ▶ we take personal responsibility and are accountable
- ▶ we are open, straight-forward and honest
- ▶ we treat everyone fairly and with respect and build trusted relationships



### Collaboration We achieve more together

- ▶ we believe we achieve more when we work together
- ▶ we partner with our clients, sharing their objectives
- ▶ we listen, respect and respond to different points of view
- ▶ we share knowledge, expertise and resources, and learn from each other



### Challenge Drive to succeed

- ▶ we embrace change and challenge the status quo
- ▶ we are flexible, adaptable, versatile and resilient
- ▶ we don't just react, we anticipate, show initiative and are proactive
- ▶ we are passionate, energetic and have the courage to take a chance



### Ingenuity Create better ways

- ▶ we constantly think of better ways to do things
- ▶ we create solutions by looking at things from different angles
- ▶ we believe that shared knowledge inspires ideas
- ▶ we are curious, inventive and explore possibilities



## Who must comply with the Code

The Code applies to all employees, officers, directors and individuals working as consultants and contractors of Broadspectrum and our subsidiaries – referred to as “Employees” for the purpose of this Code.

Employees must read and understand the Code and conduct themselves in line with the Code, and where possible, promote compliance in their immediate workplace.

Employees are required to undertake training from time to time in relation to this Code and other Broadspectrum policies. Any Employee who wishes to make a request regarding training should do so at any time via their manager/supervisor or the Governance and Compliance Group.

The standards set out in the Code also apply to Broadspectrum’s Business Partners – including clients, joint venture partners, suppliers, consultants, contractors, sub-contractors, and all other parties acting as representatives and agents of Broadspectrum.

### Reporting violations of the Code

If Employees observe, or reasonably suspect, conduct that may be contrary to the Code, unethical or illegal, they are required to report it immediately to their manager/supervisor, human resources personnel or one of the following:

#### Broadspectrum Compliance and Governance Group

[codeofconduct@broadspectrum.com](mailto:codeofconduct@broadspectrum.com)

#### Executive General Manager Compliance and Group Company Secretary

**Angelique Nesbitt:** +61 2 9464 1417

#### Whistleblower and Integrity Hotline

**Email:** [brswhistleblower@deloitte.com.au](mailto:brswhistleblower@deloitte.com.au)

**International:** +61 3 6388 8362

**Australia:** 1 800 819 877 (toll free)

**New Zealand:** 0 800 888 147 (toll free)

**North America:** 866 993 9608 (toll free)

**Chile:** 800 835 031 (toll free)

**Nauru:** +674 554 1900 (local call)

**Manus:** +675 7070 7238 (local call)

Anonymous reports may be made through the independently monitored Whistleblower and Integrity Hotline. Employees must treat all reports, however made, confidentially.

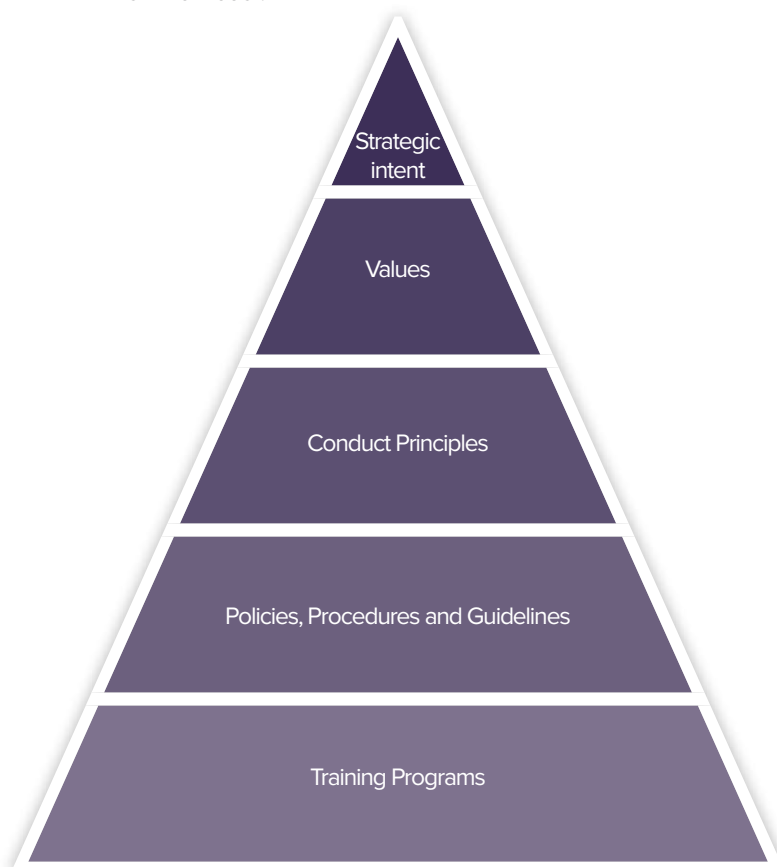
Employees will not be disadvantaged for reporting concerns as long as this is done in good faith. Broadspectrum will take reasonable steps to maintain confidentiality and/or anonymity, and to protect the Employee from workplace retaliation. Prompt and appropriate action will be taken to investigate each report received.

## Penalties for breach of the Code

If an Employee breaches the Code or any of Broadspectrum’s policies, he/she will be subject to disciplinary action that may include termination of employment.

Inappropriate conduct by a Business Partner that is not in line with the standards set out in this Code may jeopardise the business relationship with Broadspectrum, including termination of a contract where appropriate.

If a breach of the Code also involves a violation of a law, this may result in criminal prosecution, including against an individual.





## Upholding human rights



Integrity

Conduct Principle

# Respecting and upholding human rights in business

### Reference Documents

- ▶ Business Partners Policy
- ▶ Equality and Diversity in the Workplace Policy
- ▶ Group Procurement Policy
- ▶ Health, Safety and Environment Policy
- ▶ Indigenous Relations Policy
- ▶ Mandatory Safety Rules
- ▶ Privacy Policy
- ▶ Human Rights Statement

Human rights are fundamental rights, freedoms and standards of treatment to which people are entitled. Broadspectrum recognises that while sovereign states have the primary duty to protect and uphold human rights, where possible and within their sphere of influence, corporations should strive to respect human rights by seeking to avoid infringements arising from the conduct of business activities.

Employees have a responsibility to respect and uphold Broadspectrum's Values and human rights in conducting business activities on behalf of the Company. In particular, Employees:

- ▶ must comply with Broadspectrum's Mandatory Safety Rules and Health and Safety Management System
- ▶ must comply with Broadspectrum's Code of Business Conduct and Equality and Diversity in the Workplace Policy
- ▶ must comply with Broadspectrum's Privacy Policy
- ▶ must comply with Broadspectrum's accredited Environmental Management System and Business Improvement Plans
- ▶ are encouraged to engage with and monitor Business Partners in accordance with the Business Partners Policy and engage with Broadspectrum's Community Engagement Programs
- ▶ where applicable, must perform security and other related services by taking all reasonable steps to avoid the use of force, and if force is used, ensure that it does not exceed what is strictly necessary and is proportionate to the extent of the threat and appropriate to the situation, and
- ▶ are encouraged to report any suspected human rights violations to the Executive General Manager Compliance and Group Company Secretary or the Whistleblower and Integrity Hotline.





Preserving  
shareholder  
value



Integrity

Conduct Principle

## Preserving shareholder value

### Reference Documents

- ▶ Continuous Disclosure and Communications Policy

As a publicly listed company, Broadspectrum strives to deliver shareholder value and protect the investments of our shareholders through responsible and sustainable business practices. To ensure transparency in the market, Broadspectrum keeps shareholders accurately and promptly informed about significant developments in the business. Employees must:

- ▶ not intentionally engage in conduct that damages Broadspectrum's business or reputation
- ▶ exercise care when using social media where this may, directly or indirectly, impact on the reputation of Broadspectrum
- ▶ not communicate with the media and the investment community on behalf of Broadspectrum, unless authorised to do so
- ▶ appreciate Broadspectrum's status as a listed company, and
- ▶ report any significant operational and financial developments immediately in accordance with the Continuous Disclosure and Communications Policy.

### What is continuous disclosure?

As a company listed on the Australian Securities Exchange, continuous disclosure is an important obligation of Broadspectrum. This means keeping the market and our shareholders immediately informed of material information which may impact our share price, such as major contract wins/losses or acquisitions/disposals. This supports informed investment decisions about Broadspectrum.



Collaboration

Conduct Principle

## Working with reputable business partners

### Reference Documents

- ▶ Business Partners Policy
- ▶ Group Procurement Policy

Broadspectrum takes great care in building strong relationships with reputable clients, joint venture partners, suppliers, contractors, sub-contractors, consultants and other business partners. We collaborate with Business Partners that share our values and demonstrate a high standard of business conduct. We do not knowingly enter into relationships, or continue in relationships, with those who operate in violation of applicable laws and the standards set out in this Code.

For this reason, we carry out robust, proportionate and integrated due diligence relating to our Business Partners. Broadspectrum expects Employees to be thorough in their assessment of potential and current Business Partners' practices, particularly where the risks associated with location, nature, scale and complexity of their work are high.

Prior to entering into a contract with a Business Partner, Employees must:

- ▶ conduct and document thorough due diligence, including a review of the potential Business Partner's reputation, ownership, health and safety performance, qualifications and experience, creditworthiness, governance and business conduct frameworks in accordance with the Business Partners Policy, and
- ▶ receive all necessary internal approvals, including legal review.

While working with existing Business Partners, Employees must:

- ▶ regularly monitor Business Partner performance and conduct
- ▶ ensure Business Partners do not use child or forced labour or use physical punishment to discipline their employees, regardless of whether such practices are permitted by local law, and
- ▶ regularly promote compliance with this Code, including offering Business Partners access to training, and report any non-compliance.



Integrity

## Conduct Principle

# Observing laws and regulations

Broadspectrum is subject to the laws and regulations of the countries where we operate. These can relate to, for example, health and safety, the environment, employment, accounting, taxation, trade practices, and intellectual property. Broadspectrum is committed to compliance with all applicable laws and regulations. Employees must:

- ▶ comply with the content and spirit of laws and regulations relevant to their work
- ▶ seek advice from the Compliance and Governance Group where they are uncertain about what laws and regulations apply to them or the application or interpretation of those laws and regulations, and
- ▶ co-operate with any internal or external investigation or prosecution arising from a breach of this Code or any other Broadspectrum policy.

Employees should note that laws can apply 'extra-territorially.' Often this means they apply even when the conduct was not committed within the country that enacted the law. For example, Australian anti-bribery laws apply outside Australia if the offender was an Australian citizen, resident or a company incorporated in Australia. Similarly, laws in other countries, such as the United States and the United Kingdom, extend beyond their borders.

Where local law or practice permits a lower standard than set out in this Code, Employees must nevertheless comply with the minimum standards set out in the Code.

Breaches of the law may have serious consequences, including civil and criminal action against the individual and/or Broadspectrum. By law, Broadspectrum cannot reimburse any employee who receives a fine imposed by a criminal court.



Observing  
laws and  
regulations





Integrity

## Conduct Principle

# Complying with insider trading laws

While working with Broadspectrum, Employees may come into possession of price-sensitive information about Broadspectrum or another company (for example, a client). Broadspectrum prohibits Employees trading in securities of Broadspectrum or another listed company at any time they are in possession of price-sensitive information that is not publicly available. This is called insider trading and is illegal. Employees must:

- ▶ not deal or encourage another to deal in securities of Broadspectrum or another listed company at a time when they hold price-sensitive information not generally available to the public
- ▶ not communicate price-sensitive information to third parties, unless authorised to do so
- ▶ not trade in Broadspectrum securities during share trading blackout periods if restricted under the Share Trading Policy, and
- ▶ obtain prior clearance for any dealings in Broadspectrum securities if required to do so under the Share Trading Policy.

Insider trading can carry significant legal penalties, including imprisonment. Where in doubt over the definition of price-sensitive information, Employees must contact the Broadspectrum Compliance and Governance Group for guidance.

### What are securities?

Broadspectrum is a publicly listed company, whose shares are listed on the Australian Securities Exchange. Insider trading laws apply to securities of both Broadspectrum and other companies in relation to which Employees hold price-sensitive information. Securities includes shares, options and other forms of investment relating to shares.

### What is price-sensitive information?

Price-sensitive information is information about a company that could have a material effect on its share price, or that could potentially induce a person to buy, sell or hold that company's shares. This could include information on:

- ▶ a significant contract win, extension or termination
- ▶ financial or operational performance of the company
- ▶ proposed acquisitions, divestments and joint ventures
- ▶ a change in the capital structure of the company, and
- ▶ a proposed dividend or change in dividend policy.

## Reference Documents

- ▶ [Share Trading Policy](#)



Complying  
with insider  
trading laws



## Integrity

### Conduct Principle

# Competing fairly and ethically

Broadspectrum competes fairly and ethically for business, in line with applicable competition and antitrust laws, and does not prevent others from competing freely with us. To reinforce this practice, Employees must:

- ▶ be familiar with applicable competition laws
- ▶ not enter into any agreements or understandings with competitors, or other third parties, principally aimed at reducing or eliminating competition, including in relation to prices, costs, profits, clients, products or services, bids or the intent to bid, suppliers, market share and sales territories, and other aspects of the competitive strategy
- ▶ exercise care in researching competitors, suppliers and clients, ensuring no improper methods, such as theft, illegal entry, or threats, are used in the collection of information, and
- ▶ make accurate statements about the capabilities of Broadspectrum in marketing and tender materials.

#### Reference Documents

- ▶ Fair Competition Policy



Competing  
fairly and  
ethically



## Challenge

### Conduct Principle

# Striving for a high standard of service

#### Reference documents

- ▶ Customer Policy
- ▶ Quality Policy

Broadspectrum's people are experts in their fields, using skills and expertise to make a real difference to our clients. To preserve our reputation, Employees must:

- ▶ perform their duties with honesty, diligence and fairness, and in line with Company Values
- ▶ not engage in misleading, fraudulent, deceptive or corrupt practices
- ▶ place a high priority on client satisfaction and long-term profitable relationships with clients and other business partners
- ▶ provide quality services that meet contractual requirements
- ▶ encourage continuous improvement and innovation
- ▶ present a professional image through conduct and dress, and
- ▶ abide by any house rules relevant to their workplace.





Avoiding  
conflicts of  
interest



Integrity

Conduct Principle

## Avoiding conflicts of interest

### Reference Documents

- ▶ Conflicts of Interest Policy
- ▶ Related Party Transactions Policy

Employees are expected to avoid conflicts that may compromise, or appear to compromise, the objective performance of their duties for Broadspectrum. This is crucial to maintaining trust in the integrity of Broadspectrum's operations. Employees must:

- ▶ avoid activity leading to actual, potential, or perceived conflicts between their own personal interests and the interests of Broadspectrum
- ▶ immediately inform the Executive General Manager Compliance and Group Company Secretary where actual, potential or perceived conflicts of interest are identified, and
- ▶ manage any conflicts of interest in accordance with the Conflicts of Interest Policy, where conflict cannot be avoided.

### What are some examples of potential Conflict of interest situations?

- ▶ engaging a family member or relative as a Business Partner, including a sub-contractor
- ▶ engaging a family member or relative as an Employee, where there is an opportunity to review or otherwise affect their work or influence their progress or salary
- ▶ providing consulting services to a Business Partner, and
- ▶ owning a significant financial interest in a Business Partner.

A "significant financial interest" is a direct and/or indirect interest of an employee and family members of more than:

- ▶ 5 per cent of all shares of any class on issue or
- ▶ 5 per cent interest in a partnership or
- ▶ 5 per cent of the total assets or gross annual income of the employee concerned.





## Integrity

### Conduct Principle

# Condemning bribery and corruption

Broadspectrum conducts business with integrity and transparency. Employees are expected to use only legitimate practices in commercial operations and in promoting the Company's position before government authorities. Broadspectrum strictly prohibits improper financial or other advantages, such as bribes and kickbacks, intended to induce or reward favourable commercial and governmental decisions. Facilitation payments (defined below) are also prohibited. Employees must:

- ▶ not directly or indirectly (including through another party) offer, promise, give or receive – or engage a third party to offer – anything of financial or non-financial value (e.g. cash, loan, gift, favour, hospitality or otherwise) to an employee or other representative of a client or government agency for the purpose of inducing or rewarding favourable action or the exercise of influence, regardless of country, public or private sector or person concerned
- ▶ not receive anything of value (cash, loan, gift, favour, hospitality or otherwise) from a supplier, representative of a supplier, or other third party that could be considered an inducement or reward for any influence the Employee may have in any decision by Broadspectrum
- ▶ immediately report any request for a financial or other advantage, including a facilitation payment, to the Executive General Manager Compliance and Group Company Secretary or the Whistleblower and Integrity Hotline, and
- ▶ immediately report any reasonable suspicion of improper financial or other advantage being contemplated, made or received to the Executive General Manager Compliance and Group Company Secretary or the Whistleblower and Integrity Hotline, including within Broadspectrum or in connection with a Business Partner, or proposed Business Partner.

Severe legal penalties are imposed on companies and individuals that are involved in the making of, or receiving of, these kinds of improper financial or other advantages, including imprisonment of Employees and substantial fines. Where in doubt over the legitimacy of a payment, Employees must consult with the Executive General Manager Compliance and Group Company Secretary.

Broadspectrum will only tolerate the making of an improper payment where an Employee has good reason to believe that his/her or another's life, freedom or health is at risk unless a demand for payment is immediately met. In this situation, Employees must immediately contact the Executive General Manager Compliance and Group Company Secretary.

The Executive General Manager Compliance and Group Company Secretary retains comprehensive records of all reports in relation to improper financial or other advantages, including facilitation payments. Employees must co-operate in any internal or external investigation.

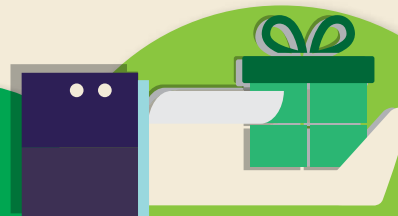
### Reference Documents

- ▶ Anti-bribery and Corruption Policy



### What is a Bribe, a kickback, and a facilitation payment?

There are no universal definitions of 'bribe,' 'kickback,' or 'facilitation payment.' Typically, a bribe is something of value offered or given to a person, or directed to a third party, such as a family member, to influence the decision maker's conduct or judgment in respect to a discretionary decision, such as awarding or retaining business. A kickback is the return of a portion of money received, or return of some form of benefit, as a reward for favourable action. A facilitation payment is a payment to a government official to facilitate or accelerate a routine non-discretionary activity, such as obtaining a permit or a license. A facilitation payment is a bribe.



Exercising  
care with gifts,  
discounts and  
hospitality



Integrity

Conduct Principle

## Exercising care with gifts, discounts and hospitality

To support the integrity of Broadspectrum's operations, Employees are required to be careful when accepting or offering gifts, discounts or hospitality (including meals, entertainment, travel and accommodation) as these may be seen to be rewarding or encouraging preferential treatment and amount to an improper financial or other advantage. Employees:

- ▶ must not offer or accept any gifts, discounts or hospitality if the exchange may, or may be seen to, reward or encourage preferential treatment
- ▶ may (where there is no suggestion of rewarding or encouraging preferential treatment) offer or accept **gifts** where the value falls under AUD \$150 (one hundred and fifty dollars) per person at any one occasion or **hospitality** where the limit does not exceed the values identified in the Broadspectrum Delegation of Authority Procedure
- ▶ must liaise with the Compliance and Governance Group where there are cultural sensitivities involved in offering or accepting a gift or hospitality, and
- ▶ must liaise with the Compliance and Governance Group, where the value of offering or accepting gifts and hospitality exceed the limits (which are also set out in the Anti-bribery and Corruption Policy) by completing the Gifts and Hospitality Form.

### Reference Documents

- ▶ Anti-bribery and Corruption Policy
- ▶ Gifts and Hospitality Form



## Collaboration

### Conduct Principle

# Participating in responsible political dialogue

Broadspectrum may sometimes express views on political matters of significance to our operations. This can be achieved through various means, including formal submissions and attendance at functions and forums. Broadspectrum does not make political donations. No Employee or Business Partner may make a political donation on behalf of Broadspectrum. Employees may attend a function or forum held by a Political Stakeholder where the cost is not borne by Broadspectrum. Employees are expected to exercise caution in liaising with political parties, politicians or candidates in the course of their employment with Broadspectrum. Employees must:

#### Reference Documents

- ▶ Political Involvement and Support Policy

- ▶ promptly advise the Compliance and Governance Group if they wish to attend a political function, and
- ▶ appreciate that corporate political involvement and support may be subject to close scrutiny and public disclosure.

In some countries where we operate, certain political involvement may be illegal. Where in doubt over the applicable legal position, Employees must seek assistance from the Compliance and Governance Group.





## Integrity

### Conduct Principle

# Using company assets and technology responsibly

Broadspectrum assets (including funds, equipment and resources), as well as Company technology (including email, internet systems and mobile devices) must be used for legitimate business purposes. Employees are responsible for the proper use of Company assets and technology under their control. Employees must:

- ▶ not take advantage of Broadspectrum assets or technology for personal gain or that of others
- ▶ not destroy or materially alter Broadspectrum assets or technology without proper authorisation
- ▶ not remove Broadspectrum assets or technology or use the Company's services without prior management approval
- ▶ use Company technology in accordance with IT policies, and
- ▶ understand that any intellectual property (including patent, registered design, trademark and copyright) in any material they create during their employment with Broadspectrum becomes and remains the property of Broadspectrum.

#### What are Company assets?

Company assets include:

- ▶ Company funds and credit cards
- ▶ time at work and work product/services
- ▶ vehicles and fuel cards
- ▶ laptops and mobile devices
- ▶ intellectual property and copyright material, and
- ▶ stationery.

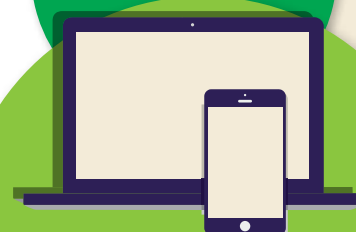
Employees should also treat client, sub-contractor, other employee and third party property as if these were the property of the Company.

#### What are some unacceptable uses of Company technology?

- ▶ uploading, downloading or distributing images, text or materials which could be seen as offensive, discriminatory or sexually explicit
- ▶ uploading, downloading or distributing images, text or materials which could be defamatory or impact Broadspectrum's reputation
- ▶ accessing internet sites related to pornography or gambling
- ▶ copying Company materials (particularly confidential information) to personal devices, and
- ▶ copying without appropriate approval of copyrighted materials – including copies of photographs, pages from books and magazines, music and videos.

### Reference Documents

- ▶ Acceptable Use of Information Technology Policy



Using company assets and technology





## Integrity

### Conduct Principle

# Maintaining complete, accurate and timely business records

Complete, accurate and timely business records are vital to transparent and reliable communication of Broadspectrum's financial and operational status. Broadspectrum relies on Employees to ensure that all business records – including financial, human resources, payroll, and environmental records and reports – accurately reflect the underlying facts and figures. Employees must:

- ▶ create and maintain complete, accurate and timely business records
- ▶ have adequate internal controls in place, such as reconciliations, to ensure accuracy of records
- ▶ comply with applicable internal controls, accounting standards and legal requirements
- ▶ not misstate or falsify underlying facts and figures or modify records to mislead others, or assist others in doing so
- ▶ seek appropriate authorisation of payments and transactions
- ▶ retain business records as required by applicable document retention laws
- ▶ co-operate with requests from internal and external auditors in relation to requests for business records
- ▶ not directly or indirectly coerce, manipulate, mislead or fraudulently influence Broadspectrum's internal and external auditors
- ▶ appreciate that business records may become subject to public disclosure, including as a result of legal action or regulatory investigations, and
- ▶ appreciate that individuals can be subject to legal action for improper record keeping.



## Maintaining business records



Integrity

Conduct Principle

# Protecting confidential information



Protecting  
confidential  
information

While working with Broadspectrum, Employees may come in contact with confidential information about Broadspectrum and our Business Partners, including our clients. Inappropriate use of such information may jeopardise Broadspectrum's reputation and our competitive position and may result in the breach of privacy, or competition/antitrust laws. Employees have a responsibility to protect confidential information, even after leaving Broadspectrum. Employees must:

- ▶ not use confidential information for personal gain or that of others
- ▶ not disclose confidential information outside Broadspectrum, except where disclosure is authorised or legally mandated
- ▶ not encourage or pressure others to divulge confidential information
- ▶ comply with the terms of confidentiality agreements they or Broadspectrum have entered into
- ▶ avoid discussing Broadspectrum matters and reviewing Broadspectrum documents in public (for example, in public bars, restaurants, elevators and airplanes)
- ▶ remember that even discussing matters on a 'no-names' basis in public can be dangerous, and
- ▶ dispose of confidential information appropriately.

## What is confidential information?

Confidential information is all non-public information relating to Broadspectrum, our subsidiaries, and our Business Partners including clients, joint venture partners, suppliers and sub-contractors.

Examples of confidential information include information in relation to operations, strategy, bids, marketing, clients and other Business Partners, financial data, intellectual property, human resources, and payroll.

Confidential information can be a document, note, plan, drawing, design, calculation, formula, model, process, methodology, procedure or trade secret, but it is not limited to such forms. It may be oral, written, recorded, and stored or electronic and may be in original form, copied, re-compiled, modified or translated.





## Conduct Principle

# Building a safe workplace

Broadspectrum's safety goal is "no injuries to anyone, anytime" and our pursuit of this ambition has established a reputation for adhering to high safety standards and demanding high levels of performance.

The health and safety of everyone who works for us or with us prevails over all operational and financial decisions and actions. Broadspectrum's expectations are that everyone takes responsibility for their own safety and that of their co-workers. In demonstrating this responsibility, Employees must:

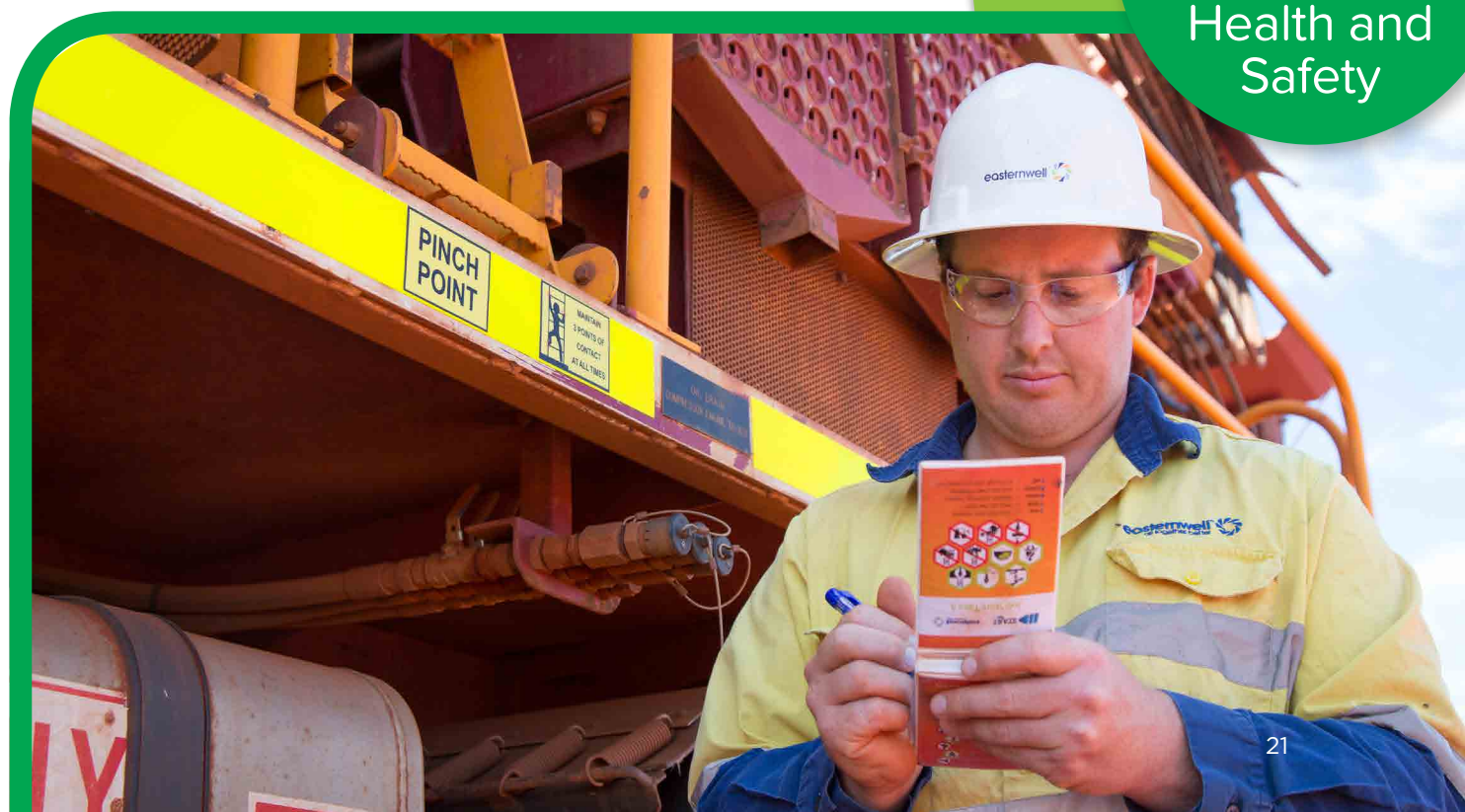
- ▶ comply with the Mandatory Safety rules and all safety policies, procedures and instructions
- ▶ where necessary or instructed, use personal protective equipment;
- ▶ report for work in a fit state (not impaired by alcohol, legal or illegal drugs or fatigue)
- ▶ not consume alcohol while at work, unless at authorised work-related functions
- ▶ immediately stop work that is unsafe or potentially unsafe
- ▶ contribute actively to the Company's hazard recognition and risk control processes. For example, development of job safety assessments, and safe work method assessments
- ▶ contribute to resolving safety issues and concerns
- ▶ promptly report any unsafe working conditions, close calls, incidents, injury or illness to their manager/supervisor, and
- ▶ familiarise themselves with emergency procedures in their immediate workplace.

### Reference Documents

- ▶ Mandatory Safety Rules
- ▶ Health, Safety and Environment Policy



Health and  
Safety





Collaboration

Conduct Principle

# Promoting workplace equality and diversity

Broadspectrum is committed to building a work environment based on principles of equality and diversity. The Company adheres to all laws relating to workplace equality and anti-discrimination in each country where we operate.

The Company recognizes that the needs of Employees vary considerably, as do those of our diverse businesses, so we support flexible working arrangements, where appropriate, to balance our Employees' personal commitments and enhance performance and productivity. Diversity together with respect and appreciation of all Employees are integral to creating a collaborative workplace culture, competitive advantage in a global environment, and ultimately, sustainable business success.

To reinforce our commitment to equality and diversity, Employees must:

- ▶ treat everyone equally regardless of gender, sexual preference, transgender status, marital or carer status, family status, employment status, disability, religion or ethical belief, colour, culture, national or racial origin, political preference, union membership, veteran status, pregnancy or age, or other individual attributes protected by law, and
- ▶ report any inappropriate practice in the workplace to their manager/ supervisor or an Equal Employment Opportunity (EEO) Contact Officer.

## Who are EEO Contact Officers?

In some of our operations, EEO Contact Officers are a point of contact for those who may have a perceived issue related to unlawful discrimination, harassment, bullying or victimisation. These officers help the aggrieved individual by providing options and processes for dealing with the issue, guided by equality and diversity policies and processes.

## Reference Documents

- ▶ Equality and Diversity in the Workplace Policy





## Collaboration

### Conduct Principle

# Preventing harassment

Broadspectrum does not tolerate harassment of any kind, and is committed to keeping the workplace free of intimidating or abusive conduct. Harassment encompasses a broad range of unwelcome behaviours that may intimidate, insult or humiliate others, and which may be based on gender, sexual preference, transgender status, marital or carer status, family status, employment status, disability, religion or ethical belief, colour, culture, national or racial origin, political preference, union membership, veteran status, pregnancy or age, or other individual attributes protected by law. Employees must:

#### Reference Documents

- ▶ Equality and Diversity in the Workplace Policy

- ▶ not engage in any form of direct or indirect harassment towards other employees and clients, suppliers and other Business Partners, at work and work-related functions
- ▶ while working in foreign countries, familiarise themselves with local culture, etiquette, protocol and communication techniques to ensure their conduct is culturally sensitive, and
- ▶ report any form of harassment in the workplace to their manager/supervisor or an EEO Contact Officer.



## Integrity

### Conduct Principle

# Respecting privacy and personal information

#### Reference Documents

- ▶ Privacy Policy

Broadspectrum recognises the importance of protecting personal information and the right to privacy of our Employees and Business Partners. Personal information is information that relates to an individual who can be identified or located by that information alone or together with other information in Broadspectrum's possession. Employees must:

- ▶ abide by Broadspectrum's Privacy Policy
- ▶ respect and maintain the privacy of fellow Employees and Business Partners
- ▶ collect and use personal information only for legitimate business purposes, and destroy that information where no longer required, and
- ▶ ensure personal information is kept confidential and not disclosed to anyone, unless authorised or legally mandated to do so.



Respecting  
privacy





Ingenuity

Conduct Principle

## Embracing the environment and sustainability

### Reference Documents

- ▶ Health, Safety and Environment Policy

Broadspectrum aims to take preventative and sustainable measures to protect the natural environment and to minimise the environmental impact of our activities.

Employees must:

- ▶ be familiar with and comply with any environmental standards and regulations that relate to their work
- ▶ take care when handling hazardous materials to avoid unplanned releases into the environment
- ▶ promptly report any incident that may have a hazardous effect on the environment to their manager/supervisor
- ▶ consider and minimise the impact of our operations on the environment, including on animals, within their sphere of influence, and
- ▶ use Broadspectrum resources efficiently and sustainably.





## Collaboration

### Conduct Principle

# Encouraging community and indigenous relations

#### Reference documents

- ▶ Indigenous Relations Policy
- ▶ Customer Policy
- ▶ Reconciliation Action Plan (Australia)

Broadspectrum is committed to being an active member of the communities in which we work, especially in remote and regional areas, and to enhancing opportunities for local and Indigenous people to participate in our business. To continue building our community and Indigenous partnerships, Employees must:

- ▶ respect local business customs of the communities in which they are carrying out work, as long as these are not in breach of this Code
- ▶ respect existing social structures present within the communities in which we work
- ▶ respect the cultural heritage value of local and Indigenous communities which may be affected by our operations, and
- ▶ respect and recognise local Indigenous customary needs and the importance of preserving local culture, custom and heritage.





Collaboration

Conduct Principle

## Sharing knowledge and challenges

Broadspectrum believes that we achieve more when we work together in an atmosphere of collaboration, respect and openness. Sharing our knowledge, expertise and resources across our international operations inspires ideas and innovation. A working environment based on respect and openness also enables challenges to be addressed promptly and effectively. To support this culture of openness, Employees should:

- ▶ listen to and respect different points of view expressed in the workplace
- ▶ take advantage of Broadspectrum's various communication channels to exchange ideas, expertise, lessons learnt and resources with their colleagues or, when a problem arises, to report it
- ▶ raise any questions, challenges, misunderstandings or problems with their manager/supervisor early, to ensure these are addressed promptly and appropriately, and
- ▶ endeavor to resolve any outstanding questions, challenges, misunderstandings or problems using one of the various internal processes outlined in the Whistleblower Policy and Internal Investigations Policy, including engaging human resources personnel.

The Code is provided to new Employees and is also available on the Broadspectrum website, and on the Company's intranet (InfinNet).

### Reference Documents

- ▶ Whistleblower Policy
- ▶ Internal Investigations Policy



Sharing  
knowledge







## Administration of the Code

The content of the Code is reinforced at induction sessions, through regular internal communications and on-line and in-person training sessions.

Failure to read and understand the Code does not excuse an employee from compliance with the Code.

New clients, joint venture partners, suppliers, sub-contractors and others working on behalf of Broadspectrum receive a copy of the Code and are required to adhere to the standards contained in the Code.

### Waivers

Where special circumstances warrant a waiver of any provision of the Code to the extent permitted by law, the Executive General Manager Compliance and Group Company Secretary will seek the Board's approval in respect of such a waiver.

### Review of the Code

Broadspectrum reviews the Code on a regular basis, and may modify or supplement this Code from time to time. Employees will be notified of any major revisions to the Code.

### Questions and comments

Comments and suggestions in relation to the content of the Code are welcome from all Employees. If Employees have any questions or comments in relation to the content of this Code, they can contact:

### Broadspectrum Compliance and Governance Group

[codeofconduct@broadspectrum.com](mailto:codeofconduct@broadspectrum.com)



BROADSPECTRUM

Infinite Solutions

9

countries

18

industries

+200

clients

25,000

workforce

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The Broadspectrum group



APP

easternwell  
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TENRIVERS



Steier  
Oil Field  
Service

HRI<sup>o</sup>