

CODE OF CONDUCT

Northern Transportables Code of Conduct represents a broad framework of ethical conduct that all people working on or visiting our site have an obligation to uphold.

Operating in conjunction with our values, policies and procedures, our Code of Conduct provides a set of six fundamental guiding principles to help us make the right decision, every time.

Northern Transportables takes compliance with the Code seriously. If you breach the Code then you may face disciplinary action, including termination. You also have a responsibility to report breaches of the Code to your Supervisor or Human Resources. Whistle-blowers will not be disadvantaged or prejudiced for disclosing alleged breaches in good faith.

1. Compliance with laws, policies and procedures

We comply with our legal obligations, regulatory requirements, relevant codes of practice and Northern Transportables policies and procedures, including the Northern Transportables Code of Conduct.

If we fail to comply with laws and regulations, both Northern Transportables and the individual employee may face criminal sanctions or other serious consequences. If you are not sure what laws and regulations apply, then you must contact your Supervisor, Occupational Health and Safety Manager or Human Resources.

2. Acting with honesty, integrity, due skill, care and diligence

Trust is integral to all our personal and business relationships – unlawful and unethical business practices undermine the trust of our colleagues, customers and the community in which we work. Honesty and integrity guide us in making decisions, so we make the correct choices between right and wrong.

Acting with due skill, care and diligence requires you to perform your duties competently,

professionally and in accordance with our controls, risk management processes and policies, including the Code.

3. Respecting confidentiality and not misusing information

You may come across confidential information or intellectual property concerning Northern Transportables or its related entities, customers, suppliers and other third parties when working with Northern Transportables.

You must not use confidential information or intellectual property to obtain a personal benefit or benefits for other people. This means that you must not, either directly or indirectly, use, retain, remove or disclose confidential information or intellectual property to a third party (including sending information to a personal email account), except in the proper performance of your duties for Northern Transportables; where we have given you written consent to do so or if you are required to do so by law.

These obligations continue after you have left Northern Transportables.

Further guidance can be found in our Confidential Information and Intellectual Property Policy.

4. Valuing and maintaining our professionalism

The way we conduct ourselves both at work and outside work directly impacts how others perceive us and therefore Northern Transportables.

We should always act in a professional and ethical manner, striving for excellence in everything that we do.

Ways that we take responsibility for our professional conduct include:

- we do what we say we will do;
- we act with honesty and integrity;
- we always promote the interests of Northern Transportables;
- we accept responsibility for our decisions and our actions;
- we provide customers with the information they need to make informed decisions;
- we ensure our products and services meet our customers requirements;
- we behave appropriately at work related functions;
- we continually improve our skills and knowledge;
- we only use Northern Transportables property for proper purposes (including trademarks and copyright, funds, equipment and facilities); and
- we protect company property from damage and vandalism.

5. We are a team

We are inclusive, supportive and collaborative, promoting an environment where everyone can reach their full potential. We treat others with consideration and respect, and we value diversity of views, ideas and culture.

We care about the health, safety and wellbeing of everyone who works on or visits our site.

Bullying, harassment, unlawful discrimination or any other offensive conduct will simply not be tolerated. Such behaviour may result in disciplinary action, including termination.

We respect our environment and the communities in which we work.

6. Responsible Management of Conflicts of Interest

Potential conflicts of interest often arise in business. Conflicts of interest can be actual, apparent or perceived. The golden rule is that we should not participate in activities that involve a conflict of interest between our personal interests and our duties and obligations to Northern Transportables.

Conflicts of interest can be managed by:

- promptly disclosing any actual, apparent or perceived conflict of interest;
- promptly disclosing a material interest you have in a customer’s or suppliers business;
- not participating in conflicting business activities outside your employment with Northern Transportables;
- not soliciting, accepting or offering money, gifts, favours, entertainments or bribes which might influence your business judgement or give rise to the perception that a business transaction may be influenced by such actions;
- seeking authorisation for gifts, invitations involving travel and accommodation and entertainment reasonably estimated to be in excess of a value of \$150 from the Chief Financial Officer; and
- keeping accurate and transparent business records.

OUR GUIDING PRINCIPALS

- Compliance with laws, policies and procedures
- Acting with honesty, integrity, due skill, care and diligence
- Respecting confidentiality and not misusing information
- Valuing and maintaining professionalism
- We are a team
- Responsible management of conflicts of interest



Simon Donnelley
 Managing Director
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DOCUMENT CONTROL

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