

Code of Conduct

December 2024

Purpose

CleanCo Queensland (**CleanCo, we, our**) is committed to maintaining fair, just, and ethical standards in the conduct of its operations and business activities. CleanCo's reputation as an ethical organisation is critical to its ongoing success.

This Code of Conduct (**Code**) embodies CleanCo's responsibilities of lawful and ethical professional conduct to its shareholding ministers, clients, business partners, consumers, and the public generally.

It also articulates CleanCo's commitment to, and expectations of, our people: individual and collective commitment to these standards help create a climate where people can thrive. These standards of business and personal conduct go beyond mere compliance with laws and regulations; they embrace the values which are essential to CleanCo's continued success.

Application

This Code applies to all CleanCo directors, executives and employees, and to all consultants, secondees, volunteers, students, and contractors working for, or at, CleanCo sites (**you, your, our people**).





Scope

This Code clearly states the standards of responsibility and ethical conduct expected of you, our people. CleanCo expects you to be familiar with, and to demonstrate a commitment to, meeting these standards.

The Code sets out the standards and expectations for the way that CleanCo operates, as a company, and the way that you and others work and make decisions in your daily activities. It is not intended to be exhaustive and cannot anticipate every situation which could provide challenges to you or us. It provides a set of non-negotiable principles to help you make decisions, alongside using your common sense and sound judgement.

You are expected to comply with the Code of Conduct through your behaviour, actions, and decisions by:

1. upholding and demonstrating our commitments to health and safety, operational excellence, customer focus, and integrity;
2. role modelling CleanCo's values of being Genuine, Collaborative, Curious, and Courageous;
3. setting an example for others by being appropriate in your conduct and behaviour; and
4. speaking out about or reporting instances of non-compliance with the Code of Conduct, the law, policies or procedures and non-adherence to the CleanCo values.

Our Values			
			
GENUINE	COLLABORATIVE	CURIOUS	COURAGEOUS
<p>We care about each others' safety, health and wellbeing</p> <p>We are trustworthy — we do what we say we will</p> <p>We are trusting — we believe the best in each other</p> <p>We greet each other on the floor</p>	<p>No one person has all the answers – our first instinct is to collaborate</p> <p>We actively share our knowledge with others</p> <p>We are better with diverse thinking</p> <p>We understand and design for our customers' needs</p>	<p>In a changing world, we get to the bottom of things</p> <p>We respectfully question inherited wisdom and the status quo</p> <p>We always seek to learn</p> <p>When something goes wrong, we uncover why without blaming</p>	<p>We focus on doing (only) what makes a difference</p> <p>We are happy to be the first</p> <p>We ask "If not us, who? And if not now, when?"</p>

Principles underpinning the Code of Conduct

CleanCo's Code is made up of the following principles:

1. We contribute to the creation of a caring safety culture and a safe workplace, and we contribute to a safe and healthy work environment that is free from workplace injury or illness;
2. We act ethically at all times;
3. We are inclusive, we treat others with fairness, professionalism and respect, and we value diversity;
4. We identify conflicts of interest and manage them responsibly;
5. We respect and maintain privacy and confidentiality;
6. We are committed to creating a culture that delivers environmental sustainability;
7. We comply with this Code, the law, and policies and procedures;
8. We immediately report any suspected breaches; and
9. As required, we investigate suspected breaches and ensure reporting requirements are met in respect of our Board, shareholding Ministers and other relevant third parties.

The CleanCo Board and Executive Leadership Team are committed to supporting our people to act in accordance with this Code. The Code is supported by other policies that form part of the CleanCo Code of Conduct Framework, which are identified as relevant below and in section 5 of this Code.

Principle 1: We create a safe and healthy work environment.

CleanCo is committed to creating a caring safety culture that promotes a safe and healthy work environment free from physical or psychological injury or illness for all our people, as well as clients, visitors, and members of the public. At CleanCo, we think of workplace health and safety as being an integral part of how our team members do business, learn, and contribute to continuous improvement. This will only be achieved through the participation, co-operation, and commitment of everyone in the workplace.

You have a responsibility to:

1. Take all reasonable care for your own health and safety, and the health and safety of others;
2. Comply with all systems, policies, procedures, instructions and directions from leaders or managers, unless in the circumstances it is unsafe or unreasonable to do so;
3. Ensure you come to work in a fit capacity to perform your role, unimpaired by health, drugs, alcohol or fatigue;
4. Not perform work that is unsafe;
5. Use equipment safely, for its intended purposes and in accordance with instructions;
6. Report, and positively support a workplace culture of reporting all incidents, injuries, near misses, and unsafe or unhealthy acts or omissions; and
7. Actively address and report identified hazards.

Principle 2: We act ethically at all times.

Through our people, we are committed to ensuring that we conduct the activities of CleanCo with honesty and integrity.

You must act ethically and:

1. Undertake your duties honestly and with integrity, care and diligence;
2. Take accountability for your conduct and decision-making, including owning up to mistakes;
3. Use all CleanCo's systems, resources, and equipment appropriately and for proper business or organisational purposes. This includes but is not limited to, for example, your use of tools, office or site-specific equipment, vehicles, your time, e-mail and messaging systems, information storage, internet access, and mobile phone usage;
4. Not engage in misleading or deceptive conduct, including unacceptable tendering practices and falsifying or withholding information;
5. Immediately report all:
 - a. suspicions of unlawful or other serious inappropriate conduct – via the Protected Disclosure Procedure reporting channels as relevant to the situation (as set out in the Whistleblower and Public Interest Disclosure Protection Policy); and
 - b. inappropriate or unethical conduct you have observed and which you genuinely believe breaches this Code or other CleanCo policies or procedures – to your leader, another member of CleanCo management, or the People & Culture team.

For more detailed information on what your responsibilities are, please read through the following Code of Conduct Framework policies:

- *Alcohol & Other Drugs Policy*
- *Asset Management Policy*
- *Conflict of Interest Policy*
- *Delegations Policy*
- *Fraud and Corruption Prevention Policy*
- *Gifts and Benefits Policy*
- *Information Security Policy*
- *Information System Use Policy*
- *Media Policy*
- *Modern Slavery Policy*
- *Privacy Policy*
- *Respectful Workplaces Policy*
- *Whistleblower and Public Interest Disclosure Protection Policy*

Principle 3: We create respectful and inclusive workplaces.

CleanCo is committed to promoting a workplace based on respect and inclusion for all – free from unlawful bullying, harassment, discrimination, vilification, and victimisation.

CleanCo is committed to employing and working with people from diverse backgrounds and recognising the operational, commercial, and social benefits that diversity of personal attributes, experiences and perspectives bring to the organisation and each other.

You must:

1. Be aware of and accountable for your own actions, and positively contribute to a respectful and inclusive workplace culture;
2. Treat people fairly and with dignity, courtesy and respect;
3. Make employment decisions based on merit (not on attributes that are irrelevant to performance);
4. Never engage in conduct which unlawfully discriminates, harasses, sexually harasses, bullies or vilifies any person at, or in association with, your work; and
5. Never engage in victimisation, take reprisal action, or treat people less favourably because they have made, intend to, or you suspect they might make a Protected Disclosure or workplace complaint or because they have participated in a workplace investigation.

More detailed information on your obligations can be found in the following policies:

- *Respectful Workplaces Policy*
- *Whistleblower and Public Interest Disclosure Protection Policy*

Principle 4: We identify conflicts of interest and manage them responsibly.

You are expected to manage conflicts of interest and never place yourself in a situation that puts, or appears to put, your private interests or those of close family members before those of CleanCo.

CleanCo requires our people to:

- a) Identify and declare any actual, potential, or perceived conflicts of interest; and
- b) Address and manage any identified actual, potential, or perceived conflicts of interest in an open and transparent manner.

To align your actions with this requirement, you must:

1. Be alert to actual, potential or perceived conflicts of interest and disclose them to your Responsible Manager as soon as reasonably practicable;
2. Disclose any outside business interests which are in conflict with CleanCo's interests (or which have the potential or could be perceived to be in conflict);
3. Disclose any personal relationships you have with a third party which are in conflict with CleanCo's interests, or which have the potential or could be perceived to be in conflict (e.g. if you are evaluating or negotiating with them on behalf of CleanCo. This includes for employment, as a customer or supplier, or for any other reason);
4. Record any registerable conflicts with the Conflicts Register held by the Company Secretary;
5. Never accept a gift or benefit if it could create any obligation or expectation that could conflict with your duties with or to CleanCo;
6. Notify your supervisor of any gifts or benefits you are offered or receive, and report if required in accordance with the Gifts and Benefits Policy; and
7. Appropriately address or manage any conflicts of interest including, where relevant, adhering to instructions or advice from managers or other relevant CleanCo staff.

For more detailed information on your obligations, please see the following CleanCo policies:

- *Conflict of Interest Policy*
- *Gifts and Benefits Policy*

Principle 5: We respect and maintain privacy and confidentiality.

During your work with CleanCo, you may come across personal and confidential information relating to the organisation, our people, customers, suppliers or other third parties.

It is important that you maintain the confidentiality of this information and you are expected to do your part to achieve this by demonstrating the following:

1. You must not disclose confidential or personal information to anyone outside of CleanCo without a clear, lawful authority to do so;
2. You must not disclose confidential or personal information to other CleanCo employees or contractors without a clear, lawful authority to do so or for a proper business purpose;
3. You must never use or disclose confidential information to gain a benefit for yourself or for someone else;
4. You must not breach insider trading laws (it is illegal, and you must not trade in securities if you have information that may affect the price of the security, and this information is not publicly known or generally available);
5. You must maintain any personal and confidential information for which you are responsible in the manner required by CleanCo; and

6. If you are unclear or uncertain of your responsibilities regarding personal or confidential information, you must seek guidance or advice from your leader, another member of management, or the People & Culture team.

For more detailed information on your obligations, please see the following CleanCo policies:

- *Privacy Policy*
- *Insider Trading Policy*

Principle 6: We are committed to environmental sustainability.

CleanCo is passionate about creating a culture that delivers environmental sustainability. We will listen to our team members, partners and the community and respond to opportunities that support reliable, sustainable operations.

It is expected that you will do your part to achieve environmental sustainability by:

1. Actively seek out and promote ways to protect and enhance the environments and communities we work in;
2. Be alert and actively strive to prevent environmental incidents at work;
3. Recycle waste in accordance with site practices and state regulations;
4. Identify and analyse all environmental hazards before the job begins and stay focused until the job is complete;
5. Work collaboratively to solve issues and reduce environmental risks; and
6. Speak up and promptly report environmental concerns.

Principle 7: We comply with this Code, the law, and policies and procedures.

CleanCo will observe its obligations under all applicable laws, regulations and contractual requirements. Our people are expected to be familiar with and act within the relevant laws, regulations, contractual requirements, policies, and procedures that apply to their roles.

You must:

1. Not take, or fail to take, any action that may breach this Code, the law, CleanCo's contractual commitments or CleanCo's policies and procedures;
2. Take all reasonable steps, including completing relevant training and education programs, to build and maintain your awareness and understanding of relevant laws, regulations, contractual arrangements, policies, procedures, and practices; and
3. Seek guidance from your Responsible Manager if you are unsure whether a particular law, policy, or procedure (etc) applies to your role.

For more detailed information on your obligations, please see the *Compliance Policy*.

Principle 8: We immediately report any suspected breaches.

In addition to your requirement to comply with this Code, other CleanCo policies and procedures, and relevant laws and regulatory requirements, you are also required to report any conduct that you suspect may breach any of these, as soon as reasonably practicable.

Any disclosure of a potential breach will be taken seriously and escalated appropriately by CleanCo. It is important that all disclosures are made in good faith. If you make a disclosure, we will take all measures to ensure you will not be disadvantaged in your employment, even if the conduct disclosed is later found not to be a breach of a policy or procedure. Making an intentionally false or misleading disclosure will be taken seriously; it may amount to a breach of this Code and could result in disciplinary action up to and including termination of employment.

In most cases, you should raise breaches of the Code, the law or policies and procedures with your Responsible Manager, another member of management, or a People & Culture team representative.

Where this is not possible or appropriate or you wish to remain anonymous, matters may be reported to the Company Secretary or the Chief Executive Officer. CleanCo also provides a confidential external service for anonymous complaints. This whistleblower service is "Your Call," available on CleanCo's website. An anonymous report can be made online 24/7 at www.yourcall.com.au/report or by calling 1300 790 228 Monday to Friday 9am – midnight AEST except Public Holidays. A person who makes an anonymous report can also choose to remain anonymous over the course of the investigation and after the investigation is finalised.

You must:

1. Report information about suspected breaches of this Code, the law, or CleanCo's policies and procedures;
2. Provide reports in a timely manner (i.e. as soon as reasonably practicable);
3. Never make a report or disclosure which is dishonest, false, or misleading; and
4. Maintain confidentiality of all reports or disclosures, where required.

For more detailed information on reporting breaches please see the *Whistleblower and Public Interest Disclosure Protection Policy*.

Principle 9: We escalate, appropriately deal with and refer suspected breaches.

CleanCo takes any failure to comply with the Code of Conduct seriously. All suspected breaches of the Code will be dealt with appropriately, which may include investigation by CleanCo or an authorised representative. If there is evidence of breaches of the Code or other policy or procedure, appropriate disciplinary and/or remedial action will be taken, depending on the nature and severity of the breach. Outcomes may include training, coaching or counselling, through to formal warnings and/or termination of employment or contract.

In certain circumstances, breaches of the Code, policies or laws could be referred to the appropriate authorities, such as the Australian Securities and Investment Commission, the Crime and Corruption Commission or the Queensland Police Service. This may occur where it is considered there has been criminal activity, an apparent breach of the law, or mandatory reporting criteria have been satisfied. A substantiated breach of a referred matter could result in criminal prosecution or civil proceedings.

Government Owned Corporations are also obliged to inform their shareholding Ministers in a timely manner of any potential or actual breach of the Code by any of our Board members, our Chief Executive Officer or senior executives.

Remember... if in doubt, talk with your line leader or a People & Culture representative.

References

The Code of Conduct is to be read in conjunction with the following CleanCo policies:

- *Alcohol & Other Drugs Policy*
- *Asset Management Policy*
- *Compliance Policy*
- *Conflict of Interest Policy*
- *Delegations Policy*
- *Fraud and Corruption Prevention Policy*
- *Gifts and Benefits Policy*
- *Information Security Policy*
- *Information System Use Policy*
- *Media Policy*
- *Modern Slavery Policy*
- *Our Commitment to Health & Safety*
- *Privacy Policy*
- *Respectful Workplaces Policy*
- *Insider Trading Policy*
- *Whistleblower and Public Interest Disclosure and Protection Policy*

Definitions

The following definitions apply to this Policy:

CleanCo, Us, Our	means CleanCo Queensland Limited ACN 628 008 159 and its subsidiaries.
You, Your, Our People	CleanCo's directors and employees, and consultants, secondees, volunteers, students and contractors working for or at CleanCo

Document governance

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Version control

Version	Date	Description	Approved By
4.0	August 2020		Board
4.1	October 2020		Board
5.0	June 2023	Amendments as proposed by Minter Ellison to capture legal obligations	Board
6.0	December 2024	Clarified wording of expectations, amended terminology (i.e. Responsible Manager) and amended formatting	Board