



Code of Conduct Policy Statement

Port Waratah core values support our desire to provide service that can be relied upon and trusted. They include being progressive, dedicated to excellence, being reliable, and acting with integrity. They also explain how we want to relate with our stakeholders; being supportive, valuing safety, working efficiently, and acting in a balanced, committed and responsible way. Port Waratah believes that honesty, integrity and fairness are essential to the conduct of its business. In everything we do we hold all employees, contractors, suppliers and other stakeholders of Port Waratah accountable to the highest industry standards, to act honestly and fairly, and maintain high ethical standards. Port Waratah expects everybody to use their reasonable common sense and sound judgment to work together to deliver on the promises we make.

This Code is supported by other Port Waratah Policies. All employees, contractors, suppliers and other stakeholders must comply with this Code, other Port Waratah Policies, and relevant Procedures.

Port Waratah is committed to:

- Our values, our 5 Drivers for Success and the articulation of our business strategy.
- Supporting all employees, contractors, suppliers and other stakeholders in performing their duties diligently and effectively and promoting frank, respectful, open and constructive communications about our conduct and standards.
- Competing ethically and lawfully, ensuring everyone understands their obligations to avoid financial, business or other personal relationships or transactions which may conflict with the proper performance of their duties or compromise or their ability to act with total objectivity in the legitimate interests of Port Waratah.
- Declaring any real or perceived conflicts of interest, including all gifts, benefits and hospitality given or received.
- Supporting all employees, contractors, suppliers and other stakeholders to resolve important ethical issues and challenges that may arise from time to time. If any person is in any doubt as to how he or she should act in any situation, the individual has a responsibility to seek advice prior to taking any action.
- Maintaining confidentiality of all requests for advice.
- Ensuring all employees, contractors, suppliers and other stakeholders maintain constant vigilance to ensure that they fully comply with all laws and regulations governing Port Waratah business activities.
- Supporting employees, contractors, suppliers and other stakeholders rights to freedom of association and non-association.
- Monitoring compliance and taking appropriate action against any employee, contractor, supplier or other stakeholder contravening this Code.

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Port Waratah Coal Services Code of Conduct

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| Version No: 1 | Latest Review: December 2019 | Next Review Due: December 2021 |
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- Reporting on and publishing our performance on an annual basis by establishing Code of Conduct objectives, targets and improvement programs which will drive continual improvement in outcomes.
- Providing the leadership, training and coaching required to ensure there is a strong awareness of Port Waratah's Code of Conduct, expectations and accountabilities.
- Engaging in a meaningful way to improve outcomes.

Port Waratah expects **EVERYONE** – employees, contractors, suppliers and other stakeholders to take personal responsibility to comply with this Policy, hold each other to account, and report any areas of concern in accordance with our Whistleblower Policy.

Hennie du Plooy
CHIEF EXECUTIVE OFFICER

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