Southern Ports

Code of Conduct

DOCUMENT CONTROL

Revision Number	Description	Reviewed by	Approved by	Review Date	Issue Date
01	New Document	People and Organisation Manager	GM People and Organisation	20/06/2017	15/02/2018
02	Reformat to new template Addition of definitions Relevant roles and responsibilities were added new procedures were added Review with reference to updated related procedures SPA changed for Southern Ports Change Code of Conduct for Code of Conduct and Ethics Changes based on consultation process	Organisational Development Manager	General Manager Human Resources	29/10/2019	25/11/2019
03	Update of breach reporting to provide clarity Expansion of scope to include Board Members Additional minor changes for clarity	IntelliPorts Human Resources and Organisational Design Lead	ELT / Board of Directors	14/05/2022	
04	Review and update per controlled document requirements	Executive Leadership Team	ELT / Board of Directors	14/05/2024	24/10/2024
05	2025 Code of Conduct Review • Expansion of scope to include contractors • Updated Roles and Responsibilities • Updated reporting • Removal of Contact Officers • Incorporate reference to SPA Privacy Policy (2025) Amendments to incorporate PSC suggestions following peer review and feedback from ELT	Group HR Shared Services Manager Group Corporate Affairs Manager External Legal (HWLE) SPA Legal	ELT/Board of Directors	23/04/2026	10/07/2026

AUDIT

This Policy shall be reviewed or revised:

- where a Risk Assessment or Audit identifies a need to review
- when legislative changes impact this Policy
- following a significant incident involving this Policy
- at least every two years.

STATEMENT BY THE CEO AND BOARD OF DIRECTORS

At Southern Ports, our **Code of Conduct** is more than a document — it is a shared promise about the kind of organisation we choose to be. Every day, across every port, our people make decisions and take actions that shape our reputation and the trust placed in us by our communities. This Code of Conduct sets the standard for those moments, reminding us that how we work is just as important as what we deliver.

Our organisational Values sit at the heart of the Code of Conduct. **Put people first. Believe in better. Embrace curiosity. Find your voice. Be greater together.** Each value expresses something fundamental about who we are: a team that protects and supports one another, strives for excellence, seeks new possibilities, speaks up with courage, and works collaboratively to achieve more than any individual could alone.

These Values are not theoretical — they come to life through the commitments we make in this Code of Conduct. We commit to providing a safe, healthy and inclusive workplace where everyone feels respected. We commit to acting lawfully and ethically, to using public resources responsibly, and to safeguarding Southern Ports' assets, information and reputation. We commit to improving continuously, learning from our experiences, and upholding the highest standards in every decision.

These commitments guide us in the big moments, but they matter just as much in the small ones: the way we speak to a colleague, the judgement we use when faced with uncertainty, and the courage we show in raising concerns. When each of us understands our responsibilities and chooses to act with integrity, we strengthen the culture that makes Southern Ports a trusted and respected organisation.

Together, we set the standard. And together, every day, **we uphold it.**

Our Values in Action

Approved by the Board at the Board meeting held on 23 April 2026

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TERMS AND DEFINITIONS

Terms used in this Standard are defined in 1 below.

Table 1: Terms and Definitions

Term	Definition
Bullying	Bullying is repeated unreasonable or inappropriate behaviour that is directed towards a worker, or group of workers and creates a risk to health and safety.
Board Member	A Director of the Southern Ports Authority Board validly appointed in accordance with s13 of the *Government Trading Enterprises Act 2023*, from time to time.
The Code of Conduct	This document, The Code of Conduct.
Chair	The chairperson of the Board, as appointed by the Minister from time to time in accordance with s16 of the *Government Trading Enterprises Act 2023.*
Confidential Information	Information: a) generally known or ascertainable (identified) as confidential, disclosure of which would cause unreasonable detriment to the owner of the information or another party; or b) provided on the basis that it would remain confidential. Confidential Information includes but is not limited to: (i) the financial, operational and corporate information of Southern Ports, its people, customers and stakeholders; and an individual person's private information, including but not limited to "Personal Information" as defined in Southern Ports' Privacy Policy, and as regulated under the *The Privacy and Responsible Sharing of Information Sharing Act 2024* (WA)
Contractor	Any person who performs work for Southern Ports under a contract for services including consultants; and additionally includes unpaid persons, with or without a contract such as visitors, students, researchers, volunteers and interns.
Corrupt Behaviour	When a Board Member, Employee or Contractor uses or attempts to use their position for personal advantage or to cause detriment to others.
Discrimination	Treating or proposing to treat someone unfavourably because of a personal characteristic protected by the law.
Diversity	The individual characteristics people have that make them unique. These characteristics can include gender identity, race, ethnicity, religion, age, sexual orientation, physical abilities, and ideologies.
Employee	Any person engaged under a contract of employment who performs work under the direction and control of Southern Ports.
Equity / Equitable / Equitably	Being fair and impartial. The creation of opportunities for equal access and success within the workplace.
Fraudulent Behaviour	A dishonest activity that causes actual or potential financial loss to any person or organisation.
Gift, Benefit and Hospitality	Any items, services or advantages, including ceremonial items, discounts, favours, entertainment or hosted events offered to an employee in connection with their role. These may be tangible or intangible and can create a real or perceived conflict of interest.
Grievance	Any grievance, problem or concern of an Employee regarding their workplace, job or co-worker relationships.

Table 1: Terms and Definitions

Term	Definition
Harassment	Unwanted, uninvited and inappropriate behaviour.
Information and Communication Technology (ICT)	The systems, devices, software and networks used to create, store, process and communicate information.
Integrity	Using Southern Ports' assets and resources responsibly for the purpose and in the manner for which they were intended. Acting with honesty and transparency, making reasoned decisions without bias by following fair and objective processes. Preventing and addressing improper conduct, disclosing facts without hiding or distorting them, and not allowing decisions or actions to be influenced by personal or private interests.
Manager/Supervisor	The person who is responsible for the day-to-day supervision, management and/or direction of an Employee or Contractor. Managers play a critical role in misconduct prevention through active supervision, early identification of concerns, and ensuring compliance with the Code of Conduct.
Minor Misconduct	Conduct that: • adversely affects the honest or impartial performance of the functions of a public authority or public officer, whether or not the public officer was acting in their official capacity at the time of engaging in the conduct; • involves the performance of functions in a manner that is not honest or impartial; • involves a breach of the trust placed in the public officer; or • involves the misuse of information or material that is in connection with their functions as a public officer, whether the misuse is for the benefit of the public officer or the benefit or detriment of another person; and constitutes, or could constitute, a disciplinary offence providing reasonable grounds for termination of a person's office or employment.
Public Officer	A person who is a public officer for the purposes of the *Corruption, Crime and Misconduct Act 2003* (WA), including Board Members, Employees and, where applicable, Contractors engaged by Southern Ports.
Serious Misconduct	Serious misconduct is conduct by a public officer who: • acts corruptly or corruptly fails to act in the course of their duties; or • corruptly takes advantage of their office or employment to obtain a benefit or to cause a detriment to any person; or acting in the course of their duties or while deliberately creating the appearance of acting in the course of their duties, commits an offence punishable by two or more years imprisonment.
Victimisation	The less favourable treatment of an Employee or Contractor for their participation in making, supporting or resolving a grievance or a breach of Equal Employment Opportunity standards, whether that participation was actual, intended or presumed, or the less favourable treatment of an Employee [or Contractor] who is a participant in the grievance process (e.g. as a witness).
We	All Employees and Board Members of Southern Ports and all Contractors to Southern Ports.

1 SCOPE

This Code of Conduct (**Code of Conduct**) is applicable to all Southern Ports' Employees, Board Members and Contractors.

This Code of Conduct summarises the standards that must guide the actions of Southern Ports' Employees, Board Members and Contractors in relation to work related activities in any forum (including social media), including outside of working hours or away from the usual workplace.

Southern Ports expects all Employees, Board Members and Contractors to be familiar with and comply with this Code of Conduct, all relevant Western Australian and Commonwealth legislation, and all Southern Ports policies, procedures and standards that support the implementation of this Code of Conduct.

A detailed mapping of the legislation and Southern Ports procedures that support the implementation of this Code of Conduct is included at Appendix 3. This provides a visual reference to demonstrate how our internal standards align with statutory obligations.

Visitors and volunteers are made aware of relevant Code of Conduct requirements through site inductions and local access controls.

2 ROLES AND RESPONSIBILITIES

This section details the accountabilities of various stakeholders with regards the Code of Conduct. Stakeholders may have multiple levels of accountability based on their role.

Table 2: Roles and Responsibilities

Role	Responsibility
Executive responsible for Human Resources	Ensure managers are aware of their responsibilities and duties regarding this Code of Conduct through training and performance appraisals.
Human Resources Manager	Periodically review this Code of Conduct to ensure its efficiency and effectiveness in the workplace and applicability of current legislation.
Internal Audit	Periodically audit the implementation of this Code of Conduct in the workplace
Managers/ Supervisors	Managers and Supervisors demonstrate the Code of Conduct through their daily decisions and behaviours and have additional responsibilities to: • Promote a safe, respectful and ethical workplace environment. • Ensure Employees and Contractors understand their obligations under the Code of Conduct and relevant policies. • Act promptly on concerns, early indicators of misconduct, or behavioural issues. • Report suspected breaches through the appropriate channels in a timely manner. • Support Employees who raise concerns, ensuring no victimisation occurs.

3 STANDARDS OF CONDUCT

3.1 Safety, Health, Environment, and Wellbeing

We are committed to providing healthy and safe working conditions and will:

- stop work and seek assistance if we believe there is a safety risk;
- identify, assess and control health, safety and environmental hazards and follow required procedures;
- be responsible for our own health and safety and that of others;
- operate in a manner that does not negatively affect a colleague's health or safety;
- comply with our safety and health management system, and help others to do the same;
- use required PPE for the task;
- be prepared for emergencies and familiar with emergency procedures;
- handle and dispose of materials safely and lawfully; and
- immediately report incidents, injuries, unsafe conditions and environmental releases.

3.2 Fitness for Work and Impairment (Alcohol and Drugs)

We are committed to a fit, safe and reliable workforce and will:

- present to work fit for duty and free from impairment (including alcohol, illicit drugs, and misused prescription medications);
- comply with testing, disclosure, return to work and rehabilitation requirements set out in Southern Ports procedures;
- seek guidance when prescribed medication may affect fitness for work; and
- never undertake work or operate plant/vehicles while impaired.

3.3 Performing Work & Professional Behaviour

We are committed to a respectful, professional and high-performing workplace and will:

- treat everyone with dignity, courtesy, honesty and fairness;
- not bully, harass or discriminate;
- consider people’s interests, rights and diversity;
- speak up if we witness inappropriate behaviour;
- ensure personal relationships do not compromise performance or integrity;
- make objective and timely decisions;
- engage professionally with customers, contractors and stakeholders; and
- perform our work to the best of our ability, taking responsibility for the quality, accuracy and timeliness of the tasks we undertake.

3.4 Information, Privacy and Confidentiality Management

We are committed to safeguarding Southern Ports’ information, reputation and obligations under relevant laws and policies, and will:

3.4.1 Confidentiality and Communication

- not disclose Confidential Information except as required by law or with proper authorisation and in line with policy;

- not misuse information for personal or commercial gain, or to the detriment of others;
- follow approved protocols for communications with ministers, ministerial staff, lobbyists, media and the public; and
- ensure personal and professional social media activity complies with Southern Ports' procedures and protects our reputation.

3.4.2 Privacy, Records and Security

- adhere to the Privacy Policy and law to safeguard personal information;
- create, maintain and file records of actions and decisions in accordance with the Recordkeeping Plan to support transparency and good governance;
- store, handle and transmit official, sensitive, confidential and personal information securely;
- not falsify, alter, misuse or destroy records; and
- promptly report suspected privacy breaches or unauthorised access.

3.5 Cyber Security and ICT Responsible use

We will:

- use Southern Ports' systems, networks and devices in accordance with the Cyber Assurance Standard and the Acceptable Use of Technology Procedure;
- manage risks associated with the use of Artificial Intelligence by complying with the Southern Ports Generative Artificial Intelligence (Gen-AI) Standard;
- use technology systems with the understanding that activity may be monitored for security, operational and compliance purposes, in accordance with applicable policies and law;
- protect passwords and credentials and never share them;
- remain vigilant to phishing, scams or suspicious digital activity;
- only access information necessary for our role and never bypass security controls; and
- report lost devices, cyber incidents or suspected breaches immediately.

3.6 Use of Public Resources (Time, Equipment and Work Tools)

We will:

- use work time efficiently and only for official duties;
- submit accurate, truthful and complete timesheets;
- use equipment, tools, IT devices and vehicles safely, responsibly and only for authorised purposes;
- take reasonable care of resources entrusted to us and report misuse, damage or loss;
- not use public resources for personal benefit or convenience.

3.7 Protecting Southern Ports Physical Assets

We are stewards of public assets and will:

- use Southern Ports' assets only for their intended purpose;
- not take assets for personal use or benefit without written permission;
- never use assets for illegal purposes;
- apply proper commercial principles when acquiring or disposing of assets;
- protect assets from waste, damage, misuse, loss, fraud and theft;
- prevent unauthorised access to facilities, information, data or other assets (where safe to do so); and

- report any suspected loss, misuse or theft immediately.

3.8 Procurement Practices & Use of Public Funds

We are committed to the transparent use of public funds and will:

- follow all applicable Southern Ports policies, procedures, probity requirements and financial delegations when committing, spending or managing public funds, including procurement, expenses, credit cards and travel;
- make payments only to legitimate suppliers for goods/services actually received;
- use approved purchasing channels and corporate cards only for authorised business expenditure;
- maintain complete and accurate procurement and payment records; and
- identify and manage conflicts of interest in procurement, avoiding perceived or actual improper influence.

3.9 Delegations, Decision Making Integrity & Segregation of Duties

We maintain integrity in decisions and controls and will:

- act only within our delegated authority and escalate decisions beyond our delegation;
- document rationale, evidence and approvals for key decisions;
- segregate duties so that no one individual initiates, approves, and reconciles the same transaction or process step;
- participate in required oversight (e.g., peer review, second sign-off, audit trails); and
- never misuse position, access or authority for personal gain or to disadvantage others.

3.10 Conflicts of Interest, Gifts, Benefits and Hospitality

Having a conflict of interest is not wrong but failing to declare and manage it is.

A conflict of interest occurs when our personal interests; financial, family, relational or otherwise could influence, or could reasonably be perceived to influence, how we perform our work. Conflicts matter because unmanaged conflicts can compromise fairness, impair decision making and undermine public trust in Southern Ports.

We are trusted to act in the public interest. Managing conflicts openly, early and transparently protects both the organisation and the individual and is a fundamental integrity requirement. We will:

- identify, declare and update the Mandatory Conflict of Interest Declaration whenever our circumstances change or a potential conflict arises;
- make decisions including employment, procurement and operational decisions based on merit, using objective, defensible criteria;
- manage declared conflicts in a timely, transparent and proportionate way that protects the public interest;
- not accept any Gifts, Benefits or Hospitality that are outside Southern Ports' conditions of employment or engagement or that are inconsistent with the Gift, Benefit & Hospitality Procedure;
- seek guidance where unsure whether a situation may create an actual, perceived or potential conflict; and
- take steps to actively avoid situations where personal interest could improperly influence, or appear to influence, our work.

3.11 Secondary Employment (Outside Work)

We safeguard impartiality and performance and will:

- seek prior written approval for any other employment, engagement or work, including being a director of any organisation (including not-for-profits), or outside business interests;
- ensure outside work does not conflict with our duties, create a perception of bias, or use Southern Ports' time, information or assets; and
- withdraw from activities where a potential or actual conflict arises and update declarations promptly.

3.12 Lobbying and External Engagement

We engage transparently and lawfully and will:

- channel lobbying activities through approved Southern Ports processes and authorised spokespeople;
- record and manage interactions with lobbyists in line with applicable government requirements and internal procedures;
- not offer or accept inducements intended to influence decisions; and
- seek advice from Corporate Affairs/Legal if unsure whether an interaction constitutes lobbying.

3.13 Countering Foreign Interference

We protect Southern Ports from covert, deceptive or coercive influence and will:

- remain alert to suspicious approaches, information requests, partnerships or offers (including research, travel, gifts, or funding) that could compromise our people, information or systems;
- follow security vetting, information-handling and due-diligence procedures for overseas engagements and third parties;
- promptly report suspected foreign interference attempts or security concerns via approved channels; and
- complete any mandated training related to protective security and foreign interference risks.

3.14 Fraudulent and Corrupt Behaviour

We act with integrity and will:

- comply with all applicable laws and Southern Ports' Fraud & Corruption Prevention Management Standard;
- avoid dealings or relationships that cause, or appear to cause, conflicts of interest;
- record transactions accurately and in reasonable detail to reflect their true nature; and
- report suspected fraud, corruption or illegal activity to appropriate authorities or via internal channels as required.

Examples of fraudulent and corrupt behaviour include:

Lower level:

- minor timesheet inaccuracies where an employee knowingly rounds up small amounts of time or claims brief periods not worked; and
- small-scale misuse of corporate resources (e.g., a short personal errand in a work vehicle).

More serious:

- deliberate timesheet fraud (claiming shifts not worked, falsifying attendance, collusion on approvals); and

- falsifying financial or procurement records; or substantially inflated/fabricated expense claims for personal gain.

4 REPORTING BREACHES OF THE CODE OF CONDUCT

4.1 Reporting Methods

If a person believes that a breach of the Code of Conduct has occurred, they must raise the concern using the most appropriate reporting option. Concerns should be addressed early wherever possible and be escalated when the matter cannot be resolved or involves a more serious integrity risk.

People who report concerns in good faith are protected under Section 4.2. Victimisation is strictly prohibited.

Step 1 – Talk to Your Supervisor or Manager (preferred first step)

Most concerns can be resolved quickly and appropriately at the local level. Employees should raise any concern with their Supervisor or Manager in the first instance. Board Members may raise concerns with the Company Secretary.

Step 2 – Contact Human Resources

If a person is not comfortable raising the concern with their Supervisor/Manager, or if the issue relates to the Supervisor/Manager, they may report the concern to the Human Resources team.

General grievances (e.g., workplace behaviours such as bullying or discrimination) should be managed in accordance with the Respect at Work Procedure, or Grievance Procedure.

Safety concerns should be raised via the Incident Event Management and Cause Analysis Procedure.

Step 3 – Reporting Suspected Misconduct to External Integrity Agencies

Where the concern involves suspected misconduct, it may be reported to the relevant external agency.

- **Public Sector Commission (PSC)** – suspected minor misconduct.
- **Corruption and Crime Commission (CCC)** – suspected serious misconduct or corrupt conduct.

Southern Ports, external stakeholders, or members of the public may also report suspected misconduct to these agencies.

Step 4 – Public Interest Disclosure (PID) – Highest Escalation Point

Public Interest Disclosures are reserved for serious wrongdoing that meets the threshold under the *Public Interest Disclosure Act 2003.*

Examples of matters that may qualify as a PID include:

- improper conduct; including corrupt conduct, as defined by the *Corruption, Crime and Misconduct Act 2003* (WA)";
- an offence under Western Australian law;
- substantial unauthorised or irregular use of public resources;
- substantial mismanagement of public resources;
- substantial and specific risk to public health, safety or the environment; or
- matters of administration that can be investigated by the Ombudsman.

Information about Southern Ports' PID Officers can be found on the Public Sector Commission website. Further guidance is available at: Public interest disclosures in WA public authorities.

If you are unsure whether a matter may be a breach of this Code of Conduct, you can refer to Appendix 2 – The Quick Test.

4.2 Protection Against Victimisation

Southern Ports strongly supports people who speak up about concerns or potential breaches of this Code of Conduct. Anyone who raises a concern in good faith, or participates in an investigation, is protected from victimisation, disadvantage or retaliation. Victimisation of a person for speaking up is itself a breach of this Code of Conduct and may result in disciplinary action.

If a person experiences victimisation as a result of reporting or being a witness to a breach of the Code of Conduct, they should immediately report this to their Manager or a Human Resources representative in the case of an Employee, or in the case of Board Member to the Chair or the Company Secretary.

4.3 Further Reporting Requirements

As part of the investigation process, the CEO, as the Principal Officer under the *Corruption, Crime, and Misconduct Act 2003*, may need to report the breach to the Public Sector Commission (PSC) for suspected minor misconduct, or the Corruption and Crime Commission (CCC) for suspected serious misconduct as required by legislation and in accordance with PSC or CCC notification guidelines. Depending on the nature of the breach, the matter may also need to be referred to the Police.

4.4 Substantiated Breaches

Any substantiated breach of this Code of Conduct may result in disciplinary action being taken, up to and including summary dismissal, which is the immediate termination of employment without notice in cases of serious misconduct. Disciplinary action will be applied in accordance with the Southern Ports Disciplinary Procedure for an Employee or may involve the termination of an engagement of a Contractor, or the use of appropriate channels in the case of a Board Member.

5 RECORDS

All training associated with the Code of Conduct will be recorded by Southern Ports.

All Code of Conduct documentation is to be recorded and managed in accordance with the Recordkeeping Plan.

REFERENCE DOCUMENTATION

This policy should be read in conjunction with the following:

Southern Ports Documentation

- Acceptable Use of Technology Procedure
- Acceptable Use of Mobile Devices Procedure
- Corporate Credit Card Procedure
- Declaring a Conflict of Interest Procedure
- Delegations Manual
- Disciplinary Procedure
- Expense Reimbursement Procedure
- Fraud and Corruption Prevention Control Framework
- Fraud and Corruption Prevention Management Standard
- Generative Artificial Intelligence (Gen-AI) Standard
- Gift, Benefit and Hospitality Procedure

- Grievance Procedure
- Health and Safety Policy
- Incident Event Management and Cause Analysis Procedure
- Privacy Policy
- Public Interest Disclosure Procedure
- Recordkeeping Plan
- Records Management Policy
- Respect at Work Procedure
- Training, Conferences and Seminars Procedure
- Work Travel Procedure
- Cyber Assurance Standard

This list of documentation is not intended to be exhaustive.

5.1 Supplementary, Legislative and Regulatory Documentation

Disability Discrimination Act 1992 (Cth)

Equal Opportunity Act 1984 (WA)

Equal Opportunity for Women in the Workplace Act 1999 (Cth)

Fair Work Act 2009 (Cth)

Fair Work Regulations 2009 (Cth)

Work Health and Safety Act 2020 (WA)

Port Authorities Act 1999 (WA)

Privacy Act 1988 (Cth)

Privacy and Responsible Information Sharing Act 2024 (WA)

WA Cyber Security Policy 2024

Public Sector Management Act 1994 (WA)

Sex Discrimination Act 1984 (Cth)

Australian Human Rights Commission Act 1986 (Cth)

Industrial Relations Act 1979 (WA)

Work Health and Safety (General) Regulations 2022 (WA)

Racial Discrimination Act 1975 (Cth)

Workers Compensation and Injury Management Act 2023 (WA)

Workplace Gender Equality Act 2012 (Cth)

This list of supplementary legislative and regulatory documentation is not intended to be exhaustive. All binding laws and regulations in force from time to time will apply to Southern Ports operations and people.

6 APPENDICES

Appendix 1 - The Legislative Basis of our Code of Conduct and Ethics

Appendix 2 – The Quick Test

Appendix 3 - Mapping of Code of Conduct Requirements to Legislation and Southern Ports Procedures

APPENDIX 1 - THE LEGISLATIVE BASIS OF OUR CODE OF CONDUCT

Southern Ports' Code of Conduct is developed having regard to the principles of the Public Sector Code of Conduct and the legislative obligations that apply to all Western Australian public sector bodies. These principles, together with Southern Ports' Vision and Values, guide the behaviours expected of our Board Members, Employees and Contractors.

Section 21 of the *Port Authorities Act 1999* (WA) requires all Port Authorities to develop and implement a Code of Conduct in consultation with the Public Sector Commission, based on the principles set out in section 9 of the *Public Sector Management Act 1994* (WA).

The Public Sector Commission sets minimum standards of conduct and integrity for public sector bodies, employees and those who work with or for public sector bodies. These standards form the foundation for our Code and support accountability, integrity and public trust.

Principles of conduct: Section 9 *Public Sector Management Act 1994*

Minimum standards of conduct and integrity.

Standard 1: Integrity

We:

- act honestly and uphold the trust placed in us by the community
- use our position and authority for the purpose intended
- provide objective and timely advice to the government of the day
- ensure our behaviour upholds the good reputation of our public sector body and the public sector.

Standard 2: Impartiality

We:

- make considered and unbiased decisions based on merit
- place the public interest over our personal interest
- declare and manage conflicts of interest
- implement government priorities, policies and decisions impartially.

Standard 3: Respect for others

We:

- communicate with and treat people with respect
- treat people fairly, having regard for their diverse backgrounds
- work together constructively, inclusively and professionally.

Standard 4: Trust and accountability

We:

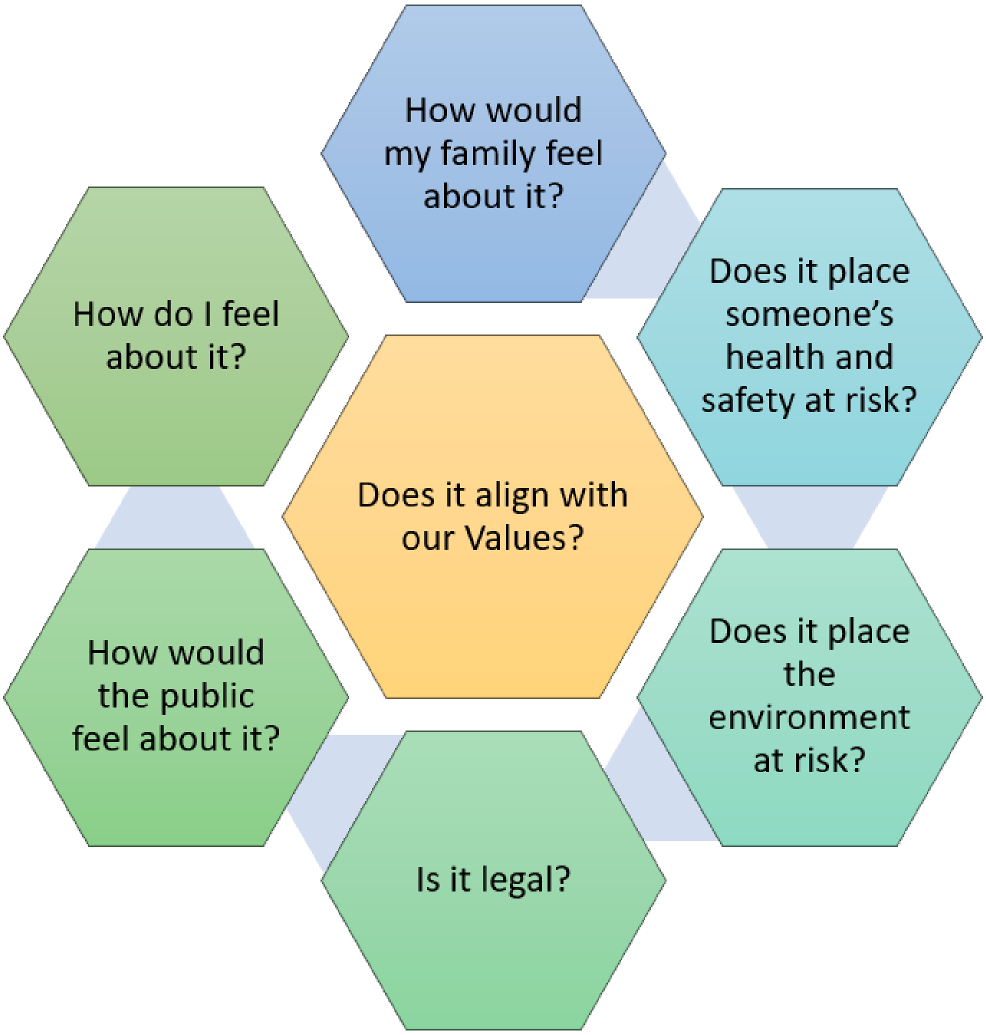
- take accountability for our time, decisions, actions and behaviours
- are responsive and provide considered advice and information to our clients, customers and stakeholders
- make decisions that ensure the best use of resources for now and the future
- access, use and disclose information only where we are authorised to do so
- record our decisions for transparency allowing for review and scrutiny

APPENDIX 2 - THE QUICK TEST

When you are unsure about whether a behaviour, action or decision aligns with this Code of Conduct, you can use The Quick Test. It is a simple tool to help you pause, reflect, and make choices that support Southern Ports' Values and integrity obligations.

If you are uncomfortable with the answer to any of the questions below, it is possible that the behaviour, process or decision may be inconsistent with this Code of Conduct. You should seek advice from your Manager or a member of the Human Resources team. Board Members should raise any queries with the Board Chair.

The Quick Test can support your decision-making and may help you determine whether a matter should be raised under the Code of Conduct or escalated under Section 4 (Reporting Breaches of the Code of Conduct).



APPENDIX 3 - MAPPING OF CODE OF CONDUCT REQUIREMENTS TO LEGISLATION AND SOUTHERN PORTS PROCEDURES

Code of Conduct Topic	Key Legislation	Southern Ports Procedures / Policies
Safety, Health, Environment & Wellbeing	*Work Health and Safety Act 2020 (WA)* *Work Health and Safety (General) Regulations 2022 (WA)*	Health & Safety Policy Incident Event Management & Cause Analysis Procedure
Fitness for Work / Alcohol & Drugs	*Work Health and Safety Act 2020 (WA)*	Drug and Alcohol Management Procedure
Professional Behaviour / Respect at Work / Bullying & Harassment	*Equal Opportunity Act 1984 (WA)* *Sex Discrimination Act 1984 (Cth)* *Disability Discrimination Act 1992 (Cth)* *Racial Discrimination Act 1975 (Cth)*	Respect at Work Procedure Grievance Procedure
Training & Induction Obligations	*Public Sector Management Act 1994 (WA)* (integrity responsibilities)	Induction Program Integrity Training Modules Code of Conduct Refresher
Confidentiality, Privacy & Records Management	*Privacy Act 1988 (Cth)* *Privacy and Responsible Information Sharing Act 2024 (WA)* *State Records Act 2000 (WA)*	Privacy Policy Records Management Policy
Cyber Security & ICT Use	*WA Government Cyber Security Policy 2024*	Acceptable Use of Technology Procedure Acceptable Use of Mobile Devices Procedure Cyber Assurance Standard
Use of Public Resources	*Public Sector Management Act 1994 (WA)*	Corporate Credit Card Procedure Delegations Manual Expense Reimbursement Procedure
Physical Asset Protection	*Port Authorities Act 1999 (WA)* *Work Health and Safety Act 2020 (WA)*	Asset Maintenance Management Standard
Procurement, Public Funds, Probity	*Government Trading Enterprises Act 2023 (WA)* *Public Sector Management Act 1994 (WA)*	Procurement and Contracting Standard Fraud & Corruption Prevention Standard

Delegations & Decision-Making Integrity	*Port Authorities Act 1999 (WA)* *Public Sector Management Act 1994 (WA)*	Delegations Manual
Conflicts of Interest / Gifts Benefits & Hospitality	*Public Sector Management Act 1994 (WA)* *Corruption, Crime and Misconduct Act 2003 (WA)*	Declaring a Conflict of Interest Procedure Gift, Benefit & Hospitality Procedure
Secondary Employment	*Public Sector Management Act 1994 (WA)*	Mandatory Annual Disclosure of Conflicts of Interest
Lobbying & External Engagement	*WA Lobbying Code of Conduct* *Public Sector Management Act 1994 (WA)*	Delegations Manual
Foreign Interference	*Security of Critical Infrastructure Act 2018 (Cth)* *WA Government Cyber Security Policy 2024*	Cyber Assurance Standard Acceptable Use of Technology Procedure
Fraud & Corruption	*Corruption, Crime and Misconduct Act 2003 (WA)*	Fraud and Corruption Prevention Control Framework
Reporting Misconduct / PID	*Public Interest Disclosure Act 2003 (WA)* *Corruption, Crime and Misconduct Act 2003 (WA)*	Public Interest Disclosure Procedure