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1. INTRODUCTION

We continue to work towards providing a safe, reliable and cost effective bulk material handling service. A key element of working safely, reliable and cost effectively is our own ethical conduct and the conduct of our business partners.

Every one of us is in a position of trust. We are all trusted with looking after the assets of PKCT on behalf of our shareholders. We are all trusted to do what's right, to ensure that PKCT and the people who work for, and with, our business, continue to prosper. Our long-term future is sustained by our reputation as a trusted and reliable business, and the way every one of us behaves is at the heart of that reputation.

Some of the information about business conduct in this Guide is specific, and some is more general. The Guide does not cover everything that could happen. Your own personal values and judgement, as well as the PKCT Values, will help you decide what's right and wrong. If you are not sure about what to do in a situation, speak with others in your team or ask your Line Leader for guidance.

This version of the Guide has been simplified, but the message has not changed. Being honest and fair, and having integrity in everything we do, is the best way to achieve PKCT's business goals. Accepting responsibility, achieving high performance, meeting commitments and earning trust must be part of the way we do business at PKCT in order to ensure the long-term future for us all.

2. PKCT VISION AND VALUES

Our Vision is:

PKCT: a sustainable and valued link in our customer's coal supply chain.

To support this Vision, the Company also has a set of Values, which are:

SAFETY	We take responsibility for safety and wellbeing, speaking up about risks, and building a strong safety culture
RESPECT	We value people, listen and speak honestly and act with integrity
ACCOUNTABILITY	We create a sustainable future by working together and delivering on our commitments
TEAMWORK	We work together by listening, valuing differences and strengthening relationships with people, customers and contractors

3. THE PURPOSE OF THE GUIDE TO BUSINESS CONDUCT

The way we do business is important. People who are critical to PKCT's future, such as our customers and the community in which we operate, take notice of it. If they approve of the way we work, they are more likely to want to keep working with us, and have PKCT as part of their community. Working to our Values will help to build a more secure future for PKCT and for all of us.

This Guide summarises the key policies and standards in place at PKCT that provide more detail of how we work to the PKCT Values. As employees of PKCT, we are all personally accountable for making sure our behaviour does demonstrate the PKCT Values. Having a Guide to Business Conduct helps all employees understand what's expected of them. Line Leaders are accountable for ensuring that employees within their teams are aware of the standard of behaviour that's required; providing information in specific situations about what is, and isn't, acceptable; and dealing with behaviour that doesn't meet expectations.

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Consultants, contractors and stakeholders working with (or for) PKCT are also expected to behave in line with the PKCT Values while they are working with (or for) PKCT. This Guide should be made available to contract companies, and individual consultants or stakeholders, before they do any work with (or for) PKCT. Where contractors are engaged in writing, a copy of the Guide should be part of the written contract requirements. Acting in line with the PKCT Values will not always have a positive result straight away, and sometimes might actually cost PKCT business in the short term. If you are ever in a situation like this, keep in mind that the long-term loyalty and trust of all of our stakeholders, including our employees, is what's most important.

This Guide contains information about a lot of different policies, with some Questions and Answers (Q&As) to help make the information more relevant to the work you do. It doesn't contain the detail of these policies and it is every employee's responsibility to ensure they understand what the policies mean to them in their role. Your Line Leaders are there to help you with this.

The Guide also won't cover every situation. Always speak with your Line Leader if you are unsure of the right decision or action to take.

4. OBEYING THE LAW

PKCT employees must always obey the law when doing their job. Some PKCT policies exist because laws say they have to. Other PKCT policies will be based on a law or laws, but may require a higher standard of behaviour than the law does.

Some laws affect everyone, such as workplace health and safety laws, environmental protection laws, and laws preventing discrimination and harassment. Other laws might only be relevant to employees in particular jobs, such as intellectual property and competition laws.

You are required to know which laws are relevant to your job, and comply with them. Ignorance of the law doesn't mean it's okay not to obey it. If you are not sure about which laws are relevant, speak with your Line Leader.

Q: If a PKCT policy requires more than what the law does, it is okay to just obey the law?

A: Where a PKCT policy is of a higher standard than the law, you must follow the PKCT policy.

Q: What if I have breached a law in doing my job?

A: If you think you have, or you're not sure, you should talk to your Line Leader straight away. There might be penalties for not reporting a breach of the law once you are aware of it. This is one reason it's really important that you do understand what laws apply to your job, and how to obey them.

5. ACCOUNTABILITY

5.1 Responsibilities of all Employees

All employees are expected to understand the contents of this Guide. Employees also need to understand the Company policies and standards that relate to their job.

If you don't understand a policy or standard and how to follow it, or any part of this Guide, it is your responsibility to speak with your Line Leader or Human Resources.

Every employee is expected to follow the policies and standards that apply to their work.

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5.2 Responsibilities of Line Leaders

Line Leaders must take all reasonable steps to ensure that PKCT employees, consultants, contractors and other stakeholders are aware of and comply with the PKCT Values, and the policies and standards in this Guide.

If problems related to Business Conduct occur, this should be raised with the General Manager or Board of Directors (where necessary).

Line Leaders can be held accountable for the behaviour of employees in their teams, and therefore they must:

- ensure that employees and contractors (where required), have access to Company policies and procedures;
- take employee concerns about business conduct seriously and respond quickly;
- get advice from the Human Resources or General Manager if required;
- behave in a way that aligns with the PKCT Values and the Guide, so that the teams they lead can see what's expected of them.

6. WHAT TO DO IF YOU HAVE A CONCERN

Sometimes it can be difficult to recognise if there is a problem with business conduct. Different opinions, work pressures and other factors mean that sometimes people make decisions that are not the best choice in terms of business conduct.

If you're in a situation where you are not sure what's right, ask yourself:

- Is my behaviour, or the decision I am about to make, in line with the PKCT Values?
- Could I injure someone or put them at risk?
- Would my behaviour comply with all relevant laws and regulations?
- Would my behaviour violate any Company policies or standards?
- Would my behaviour make me feel uncomfortable or uneasy?
- Would I feel comfortable telling my work colleagues, family and friends about what I had done?
- How would my behaviour look to others if it was a newspaper headline, or on the TV news?

If you think someone's action or decision doesn't demonstrate the PKCT Values and the standards set out in this Guide, or if you are unclear about what to do in any situation, as soon as possible, talk to:

- Human Resources
- the Leader responsible for the policy area concerned; or
- the General Manager.

When you raise a concern with any of these people, it will be taken seriously.

They are responsible for answering your questions and concerns about business conduct quickly, and for giving you correct information and advice.

How a concern about business conduct is dealt with will depend on what the behaviour is, and how serious it is.

You will not be punished for reporting genuine concerns or giving information that helps to resolve an issue. If you are worried that you will be, speak with Human Resources or the General Manager.

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7. CONFIDENTIALITY AND INVESTIGATIONS

The person you raise the concern with will keep the information confidential as much as they possibly can, and they will let you know if they need to involve others.

Most concerns about business conduct will require some level of investigation, in order to ensure fairness to all parties, and to help management decide the right action to take.

If an investigation does take place, the person you raise the issue with will need to talk to others to collect information. They might also need to get advice from others in the organisation, or from lawyers or auditors.

At the right time in the investigation they will also need to let the employee/s concerned know about the allegations, and give them a chance to respond – otherwise, it wouldn't be a fair process.

PKCT will not tolerate any form of punishment or retaliation against an employee who raises a genuine concern.

8. PROVEN VIOLATIONS OF BUSINESS CONDUCT STANDARDS

If a concern about business conduct is raised, and it is proved by investigation that an employee has not followed a policy or standard, they may be subject to disciplinary action.

It does not need to be proved "beyond reasonable doubt". Management need to be satisfied by the investigation that it is likely that the employee has breached a policy or standard. Once they are satisfied this is the case, they will decide whether disciplinary action should be taken and if so, what it should be.

The disciplinary action taken will depend on how serious the violation is, and the actual circumstances of what has happened.

If the employee has also broken the law, the matter will be referred to the relevant law enforcement agency. This might happen during the Company's investigation process, to assist with that investigation.

Q: Will I get into trouble with my Line Leader if I don't raise a concern directly with them?

A: It's always best if you can raise concerns with your Line Leader first, but in some situations you might not feel comfortable doing this. Remember you can also discuss any concerns with Human Resources or with the General Manager. What's important is that genuine concerns are raised, and you will not be punished or get into trouble if you don't raise them with your Line Leader.

Q: What is a 'genuine concern'? What if the conduct I'm concerned about is not really a problem? Will I be punished?

A: If you really believe that a decision or action is a business conduct concern, you should raise it. If you do, even if your concern is not supported, there will be no action taken against you.

If anyone deliberately provides false information in order to cause damage to someone else, they will be subject to disciplinary action.

Q: What will happen if I report a business conduct issue that I'm personally involved in?

A: If you've made a decision or behaved in a way that breaches policy, standards or the law, you may be disciplined, but the fact that you have reported it yourself will be taken into account in deciding the disciplinary action to be taken. If PKCT finds out about it another way, the consequences may be worse.

Q: What if I have a genuine concern about a PKCT contractor or stakeholder and their behaviour?

A: If a consultant, contractor or stakeholder doesn't meet the standards set out in this Guide, you should report it as well. Management will be responsible for deciding what happens and for ensuring the issue is resolved.

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9. THE WAY WE WORK AS INDIVIDUALS WITH OTHERS

9.1 Safety and Health

PKCT is committed to a safe workplace and continual improvement in health and safety performance. As an employee, you have a duty of care to consider your own health and safety, and the health and safety of others, in the way you do your job.

You have the authority to stop any practice that puts yourself or others at risk. It is your responsibility to report incidents through the normal site procedure, and raise concerns about safety and health with your Line Leader.

You are expected to be fit to attend work, and participate in safety and health initiatives that contribute to continuous improvement.

Refer to the PKCT Safety, Health, Risk, Environment and Community policies for more detailed information.

Q: I know we say “Safety First”, but sometimes the operation seems to be more important. I’ve raised this with my team, but they told me that it’s just the way it is and if I speak up, I could be targeted as a troublemaker. What should I do?

A: When we say Safety First, we mean Safety First. The first person to speak with about your concerns would be your Line Leader. If you are not happy speaking to them, talk to your Two up leader or Human Resources. PKCT will not tolerate employees being punished or targeted because they raise a genuine concern.

Q: I slipped and strained my back at work, but I don’t want to report it because I was partly to blame and my team has a great safety record. What should I do?

A: Report it. You are not doing yourself, your team, or PKCT a favour by hiding it. You might need medical treatment and without a record of the incident, you will not be covered by Workers’ Compensation. Also, someone else might slip in the same place or in the same way, and be hurt more badly. Reporting incidents and near misses gives PKCT a chance to fix problems that we otherwise might not have known about.

9.2 Alcohol, Tobacco and Drug Use

Alcohol and drug use can affect work performance and make the workplace unsafe. You are required to be unimpaired by alcohol or other drugs, legal or illegal, while you are at work.

The [Alcohol and Other Drugs Standard](#) sets out what will happen if you are affected by alcohol or other drugs in the workplace. The primary aims of the Policy are to help employees seek treatment and to discourage abuse.

However, if you come to work seriously impaired and you are a risk to the health and safety of yourself or others, this will be regarded as serious misconduct, and will be referred immediately to the relevant Line Leader.

Ongoing poor performance caused by alcohol or drug use is also unacceptable and will be managed as a disciplinary issue as per site procedure.

Having, transferring or using illegal substances on PKCT premises or at work-related functions is breaking the law and will not be tolerated.

If you are at a work-related or PKCT function where alcohol is served, it is acceptable to have a few drinks, as long as you behave appropriately and do not breach any other PKCT standards or policies. You are also expected not to drive any vehicle while under the influence, or do anything else that would create a risk to the safety of yourself and others, if you do have drinks at a work-related or PKCT function. Please note this may include any event that is associated with the workplace but not funded by PKCT.

PKCT has a No Smoking Policy that aims to protect people from the risks to health that can arise from passive smoking. Smoking is prohibited on all areas of the PKCT site.

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Q: A contractor who does a bit of work for PKCT has suggested a few Christmas drinks on site and I have been invited to attend. Should I go?

A: The consumption of alcohol on site is prohibited. You should let the contractor know that the function must be held offsite. You also need to think about whether you could be breaching the PKCT policy on gifts and hospitality (see Business Conduct: The way we work with our partners).

Q: Part of my job is operating heavy machinery. My doctor prescribed some medication to help me recover from a bad cold and the instructions on the bottle say that it could make me drowsy. Should I be operating the equipment?

A: Tell your Line Leader of straight away – before you operate any equipment. If you are affected by the medication and you operate machinery, you risk hurting yourself or someone else. You will probably be given other tasks until you finish taking the medication. If you still have cold symptoms, think about whether it would be better for you to be at home. That way you're not passing the germs on to your team.

9.3 Harassment, Discrimination and Bullying

PKCT is committed to developing a diverse workforce and to providing a work environment in which everyone is treated fairly and with respect.

This includes ensuring that the workplace is free of discrimination on the basis of personal factors that are not relevant to how well someone can do their job, including age, race, sex, disability, marital status, carer's responsibilities, religion, homosexuality and union membership or political activity.

People are employed and promoted on the basis of merit.

Any form of harassment or bullying, including physical abuse, that happens in the workplace or is connected with work, is serious misconduct.

You are responsible for thinking about the impact your actions might have on others, making sure that you don't behave in a way that could be harassment or bullying, and changing your behaviour if it is affecting others, even if you didn't realise it might have been offensive.

For a complete list of factors that may be discriminatory and for more information on the grievance process, refer to the Company EEO Policy and the EEO Grievance Procedure.

Q: Members of my work team make jokes about my race. When I tell them I find it offensive, they laugh and tell me to toughen up. Should I just ignore it?

A: You've done the right thing by telling them their jokes are offensive as it gives them a chance to improve their behaviour, although the law doesn't require you to tell them. If they keep it up, talk to your Line Leader or Human Resources. PKCT will not tolerate harassment of any kind.

Q: I missed out on a promotion that I'm qualified for, and I think it was because my Line Leader prefers to promote younger employees. I have heard the Line Leader say that he will get more value out of younger employees who will stay around for longer. Is there anything I can do?

A: Decisions about employment promotion, training and so on should be based on merit and on your ability to do the job. It might be that even though you are qualified for the job, the other person has skills or qualities that you are not aware of, that make them a better choice this time. However, if your Line Leader did make the decision based on your age, it would be discriminatory. You should discuss the situation with Human Resources so it can be properly investigated, in fairness to all parties.

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Q: I've received some aggressive messages on my Facebook account from a co-worker who I had a disagreement with last week. I have blocked her from my account now, but we have mutual friends who tell me she posted some really nasty comments about me. Do I just have to put up with it?

A: This could be bullying behaviour, and as your connection with this person is based on work, it can be linked back to the workplace. PKCT will not tolerate workplace bullying or harassment. For PKCT to act, we would need a formal complaint from you in order to investigate it further. The investigation would involve speaking with your mutual friends as well as your co-worker so we can decide whether or not it is bullying behaviour, and what action to take if it is. Speak your Line Leader or Human Resources.

9.4 Privacy of Personal Information

Employees are entitled to have their personal information treated confidentially, and used only for genuine business reasons.

Sometimes PKCT might also collect personal information from people who are not employees, for example, job applicants or community members who may call the Environment Hotline. They are also entitled to expect confidentiality.

Personal information is any information that can be used to identify someone. A person's name, address, phone number, date of birth, tax file number, motor vehicle licence number, salary details and payroll records are some examples of personal information.

If your role involves collecting personal information from employees, you must let them know what it will be used for, and who can access it.

If you have access to employee personal information in your role, you must only use it for the purpose for which it was collected. If you need to use personal information for any other reason, you must speak with Human Resources before doing so.

You must not provide employee personal information to other employees, unless they need that information to do the work that PKCT employs them to do.

You must not provide personal information about employees to outside organisations unless it is required by law, or unless you get consent from the employee to pass the information on.

If you have access to personal information of people who are not employees of PKCT, this personal information should be treated the same as employee personal information.

Q: I have access to employee home addresses and contact details. The Chairperson of the site social committee has asked me for phone numbers for a couple of the guys who haven't yet replied to the Christmas party invitation. Can I give the information to her?

A: You can only give her the phone numbers if you have the employees' permission to do so. Even though the social committee is linked with work, running the social committee is not part of the job the Chairperson is paid to do, so the request is not a genuine business reason. To give her their personal phone numbers without their permission would be an invasion of their privacy and would breach the Privacy Act.

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10. GOVERNMENTS

10.1 Community Engagement

At PKCT, we want to be valued by the community we operate within. To do this, we communicate and engage regularly with the community to build a relationship based on honesty, openness, mutual trust and involvement.

If you have contact with community members as part of your job, you should ensure you understand the information you are allowed to discuss, and the information that should be left to others at PKCT. See the sections on Confidentiality and Privacy of Personal Information for more information.

It is also important that you treat community members with respect if they raise an issue, and, if you can't help them with it, ensure that the issue is passed on to someone within PKCT who can.

10.2 The Environment

PKCT is committed to preventing pollution by operating in an environmentally responsible manner, sensitive to community and customer expectations. As an employee, you are expected to behave in accordance with the Health, Safety, Environment, Community and Risk Policy.

You have the authority to stop any practice that breaches PKCT environmental standards. It is your responsibility to report environmental spills or incidents through the normal site procedure, and raise concerns about environment with your Line Leader.

Q: In certain weather conditions, we can only keep the plant running if we let partially-treated storm water out into the harbour. I know our environmental licence says we shouldn't do this, but it's expensive to stop the operation just to fix one bit of equipment. Can't we just let the water out?

A: You might be able to put a temporary fix in place to stop the overflow, while the proper equipment is being fixed. Talk to your Line Leader so you can make sure we don't cause any damage to the harbour, or breach our licence conditions.

10.3 Governments

Government decision making is important to our continued operation. We respect the authority of governments and want to maintain honest relationships with governments and their representatives.

If you provide information to the government on behalf of PKCT, you must ensure all information is accurate. Errors or omissions could damage PKCT's reputation and could even be illegal.

If you are asked to comment on behalf of PKCT about government issues or policy, you must ensure that you are authorised to do so, or refer the person who is asking to the General Manager for their comment.

10.4 Political Contributions and Activities

PKCT does not support any particular political party, and will not contribute funds to any political party, politician, or candidate for public office in any country.

PKCT does take part in public debate about policy issues that affect our operation. For example, PKCT might talk or write to government officials about how a proposed policy might impact on PKCT.

You must not represent PKCT as supporting any particular political party or candidate.

You are permitted to attend an event organised by a political party or politician, as long as the reason for attending is to be briefed on an issue that is relevant to PKCT's business. If you are not sure whether you should go, check with Human Resources or the General Manager.

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Q: As a PKCT employee, am I allowed to take part in political activities, and make personal donations to the political party I support?

A: You may take part in political activities such as running for office, holding a public office, or making personal donations, as long as any activities don't involve the use of PKCT funds, time, equipment, supplies, facilities, or other resources. You must also make sure it's clear that you are representing your own views and not those of PKCT. If in doubt, consult your Line Leader or Human Resources.

11. THE WAY WE WORK WITH OUR PARTNERS

11.1 Third Parties and Agents

Sometimes it might be necessary to engage a third party or agent to represent PKCT's interests. Third parties and agents are expected to act in accordance with the PKCT Business Conduct standards at all times.

If you engage a third party or agent to act on behalf of PKCT, you are responsible for their behaviour and for making them aware of the expected Business Conduct standards. Payment made to third parties or agents must never appear to be a financial inducement to influence a decision in favour of PKCT; so the fee paid should be consistent with what would apply in normal commercial arrangements.

11.2 Competition Law

The Competition and Consumer Act is designed to promote competition in business and to protect the interests of consumers. It prohibits anti-competitive agreements or understandings between competitors, certain 'exclusive' supply or distribution arrangements, misuse of market power to damage competition, anti-competitive mergers and misleading or deceptive conduct. PKCT shares an interest in the conduct of business in a competitive environment.

The law is actively enforced by the Australian Competition and Consumer Commission.

Breaches of competition laws can carry serious consequences for PKCT and for employees or other people who may be involved. Penalties include fines which can run to many millions of dollars. Businesses or consumers who are damaged by unlawful conduct can sue to recover damages as well. Conduct in breach of these laws, is strictly prohibited.

11.3 Bribery and Corruption

Bribery is unlawful in Australia. The consequences are serious and can include imprisonment. Bribes, 'kick-backs' and similar payments are prohibited by PKCT as they can expose PKCT and individuals to criminal prosecution.

PKCT does not tolerate financial payments or payments 'in kind' (see "Gifts and Hospitality" for examples) being made to try to influence individuals to give us business, or to make a decision that benefits us. Under no circumstances will this kind of arrangement be approved.

In the same way, you should not ask or encourage potential suppliers or contractors to provide favours in return for getting business with PKCT.

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11.4 Conflicts of Interest

You should avoid activities outside work that could influence, or could seem to influence, your decisions as an employee of PKCT. These are called “conflicts of interest”. Even if you are objective, others might think that you’re not. And sometimes, even if you mean to be objective, if you have a conflict of interest, it can be really hard to be.

If you’re not sure if something you do outside work could be a conflict of interest, speak with Human Resources.

In particular:

- You, and members of your immediate family, must not have financial investments in any business that has dealings with PKCT if you can personally influence PKCT decisions about that business.
- You should not hold an official position with, or have a relationship with, any business that has dealings with PKCT if you can personally influence PKCT decisions about that business.
- You should not take on outside employment (paid or unpaid) with any business that has dealings with, or competes with, PKCT; or start up a business that competes with PKCT.
- You should not be involved in any recruitment activities where a member of your family has applied for a position.
- You should not be in a position to influence the employment conditions or performance assessment of a member of your family.
- You must be careful about accepting gifts or entertainment as these can also be a conflict of interest. See “Travel, Gifts and Hospitality”.

Q: My brother has the best rates available, can I hire him to do some contract work for PKCT?

A: PKCT usually doesn’t permit business dealings with family members because it is so difficult to avoid conflicts of interest. If a proper and transparent request for tender / proposal was put out, and your brother sent in a proposal, as long as you were not involved in the decision making process, his proposal would be considered on its merits along with all of the others. If you engaged him yourself to do work for PKCT, that would be a breach of the Conflict of Interest policy and, therefore, misconduct.

Q: My husband works for a local company that supplies our plant. Sometimes I am responsible for purchasing supplies from them. What should I do?

A: Tell your Line Leader. You shouldn’t have any dealings with your husband's company. One of their competitors could claim that you are discriminating in his favour.

Q: My daughter wants to work at PKCT. What’s the policy on this?

A: Your daughter is very welcome to apply for a job at PKCT. She will be compared fairly with all other candidates and as long as she is the best person for the job, she can be employed in any position that doesn’t report to you (or that you report to). You must not use your influence to make sure that she gets the job, and you should not be involved in the hiring process in any way.

11.5 Travel and Accommodation

For all PKCT-related business travel and accommodation, you should use the approved suppliers. You should not book travel without up-front approval from your Line Leader.

Private travel attached to business travel must be approved before bookings are made. If you want your spouse or partner to travel with you, it must be approved by the General Manager.

The expectation that you will behave in line with PKCT policies and standards continues to apply while you are travelling for work.

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11.6 Gifts and Hospitality

You must be extremely careful about giving or receiving business-related gifts. This includes direct payments and payments 'in kind', including goods and services, personal favours, meals, entertainment and travel. This also applies to members of your immediate family.

If you are offered free travel and/or accommodation, you must decline it. If you have a valid business purpose to travel, you should apply to your Line Leader for PKCT to pay the costs.

The following must not be given or accepted under any circumstances, regardless of their value: loans, cash or personal cheques; drugs or other controlled substances; product or service discounts that are not available to all employees; personal use of accommodation or transportation; gifts or hospitality that are inappropriate or against PKCT values (for example, sexually oriented).

Giving or accepting gifts of modest value may be acceptable, if it is part of the way business is done and the gifts are appropriate for the occasion. However, you must never ask for a gift of any kind from a supplier, customer or business partner.

You should not give or accept a gift in any situation where it could be seen as influencing a business decision or creating a business obligation. (See "Bribery and Corruption") This is particularly the case if PKCT is involved in a decision about suppliers and you are in a position to influence that decision. In addition, gifts should not be exchanged with PKCT's competitors, as this will create an actual or perceived conflict of interest.

Summary of requirement to declare and seek approval:

	< \$10 Not required to declare	Below Modest Value < \$50 Must declare but no approval required	Above Modest Value > \$50 Must declare offer, and obtain approval prior to giving or accepting
Gift	Giving or receiving cheap promotional items (e.g. Pens, pencils, water bottles etc.) With a value of less than \$10.	Giving or receiving an item with a value between \$10 and \$50	Giving or receiving an item of greater than \$50 in value (e.g. A nice bottle of wine).
Entertainment		Giving or receiving a ticket or invited to an event valued at less than \$50 (on a one off basis).	Giving or receiving a ticket or invitation to an event valued at more than \$50. Giving or receiving a ticket or invitation to an event (of any value) more than once to/from the same third party.
Hospitality		Giving or receiving a paid meal or drinks with a value of less than \$50 (on a one off basis).	Giving or receiving a paid meal or drinks with a value of more than \$50. Giving or receiving a paid meal or drinks (of any value) on more than one occasion to/from the same third party.

11.6.1 How to declare or seek approval:

To declare or to seek approval, please email your Line Leader and copy in HRTeam@pkct.com.au with the following information:

- Name of the third party;
- Description of the gift, entertainment or hospitality (including approximate value);
- Indication of whether you are offering or you are accepting the item;

- If above \$50 and you are intending to give or accept something, please indicate to your Line Leader that you are requesting approval.

Once approved, this information will be entered by HR into a PKCT Gifts, Entertainment and Hospitality declaration register.

Q: May I accept a gift that bears the name or logo of another company?

A: Lots of companies give out promotional goods with their company logo or name. These gifts are usually not expensive. You can accept promotional gifts, again, if it looks like it is expensive then talk to your Line Leader or Human Resources.

Q: One of my friends works for a PKCT supplier. Does this policy mean that we can't give each other gifts?

A: If you can personally influence decisions about your friend's company, you must tell your Line Leader and Human Resources about your friendship and appropriate ways to manage this conflict can be agreed moving forward..

Q: I received a gift from a customer and I don't know how much it is worth. How do I know if I need to tell my Line Leader about it?

A: Use your best judgement to estimate its value. If you're still not sure whether it's of 'significant' value, tell your Line Leader about it anyway, or check with Human Resources. Here are some examples that might help. Keep in mind that any of these things on their own could still have 'significant' value.

- A bottle of wine would usually be okay, but more than one should be reported.
- If customers or suppliers pay for your meal after a business meeting occasionally that would be okay, but if it's happening regularly you should report it.
- A ticket to a sporting event or the theatre for you and a partner is usually ok; box seats at the State of Origin, or regular event invitations should be reported.

Q: I just wrapped up an important contract with a supplier, and they've sent me a bottle of Penfolds Grange Hermitage. Is this a gift or a bribe? Should I keep it?

A: The supplier might mean well but the timing of the gift, and the gift itself, is just not appropriate. It could look like you're being paid 'in kind' for giving them the work. You must tell your Line Leader, return the gift to the supplier and explain the PKCT policy.

It can be difficult to work out whether something is a gift or a bribe. A bribe is usually secret, and gifts are usually out in the open where others can see. A gift is meant to recognise and enhance a business relationship, while a bribe is about owing something in return. In this situation, the wine is more likely to be a gift – but because it's of high value, keeping it would breach the PKCT policy.

11.7 Entertaining Others

You might sometimes need to entertain clients or associates in your role. If a business discussion takes place during, immediately before or immediately after an entertainment event such as a meal, theatre or sporting event, under tax laws, expenses for those events can be claimed.

PKCT policy is that there must be an existing business relationship for this to be acceptable, otherwise it might appear that you are trying to influence a decision in PKCT's favour.

Q: I have been asked to organise entertainment for a group of visiting customers. Are there any guidelines on the level of entertainment that is allowed?

A: Talk to Human Resources or your Line Leader about what's reasonable and appropriate. Always make sure you get up-front written approval if you are planning to spend PKCT funds on entertainment.

11.8 Outside Activities

If you are asked to be a director in most external organisations, you will need to ask for PKCT approval before you accept. Every request will be considered on its merits.

PKCT has this policy in place for a few reasons.

- Being a director of an external organisation can take up a lot of your time, and PKCT wants to be sure that you can still fulfil your employment duties.
- Because you are an employee of PKCT, even though your directorship is not directly related to PKCT, some people in the community will not see the difference. This could be a concern for PKCT if the organisation you're a director of has a controversial public opinion about an issue, or if the organisation does business in a way that's not consistent with PKCT policies or standards. Your directorship could have a negative effect on PKCT's reputation in the community, without you meaning for that to happen.
- In many cases, even if the organisation is completely unrelated to PKCT and what we do, there will still be situations where you have a conflict of interest.

If you want to be a director of another company, a government advisory body, political party, professional institution, trade association, charitable or public organisation, you must request approval from the General Manager, who will decide if the PKCT Board needs to approve it.

You do not need approval for directorships in organisations that are not engaged in business activities and that you are only part of for personal reasons, such as sporting or social clubs.

If you give an opinion while engaged in any outside activity, you must be clear that it is your own personal opinion and is not representing PKCT. Do not express an opinion on any issue that is sensitive for PKCT.

Full-time employees are generally discouraged from working a second job or operating their own business, even if there is no possible conflict of interest. If you do take on a second job you must tell your Line Leader, in case there is a conflict of interest that you aren't aware of.

Q: May I participate in voluntary organisations such as school committees and service clubs?

A: Absolutely; it's great that you want to play a role in the community. Membership of these kinds of organisations is not an issue for PKCT. If you hold a senior role in a club or committee that might have dealings with PKCT, you should let Human Resources know, so that if there is a conflict of interest we can work out how to ensure that you aren't involved in decisions about your club or committee.

Formal appointments to a Board in any of the organisations outlined above are quite different to this and should be discussed with Human Resources to check if PKCT approval is required.

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Q: I have been asked to become one of the directors of a non-profit social service organisation with which I am involved. The organisation has nothing to do with PKCT. Does the Board need to approve this kind of directorship?

A: Possibly, if the position will have a high public profile, or deal with issues that are controversial in the community, or take up a lot of your time. Talk to Human Resources if this is the case.

Q: I have been offered a part-time job with another company, working when I am not rostered on at PKCT. This won't interfere with my work at PKCT, can I accept?

A: It is generally okay for you to accept outside employment, as long as it doesn't impact on your employment with PKCT and doesn't create a conflict of interest. If taking another job meant that you couldn't work your rostered hours or reasonable additional VERA, it would not be okay. You must not accept employment with a competitor, supplier or customer of PKCT as this would be a conflict of interest.

Full-time employees are expected to discuss outside employment with their Line Leader.

Q: I would like to participate in a political party that does not share PKCT's views on certain issues. Does PKCT have a right to tell me that I can't get involved? It's outside working hours after all.

A: Membership of the political party is completely okay, as long as you aren't speaking out publicly against PKCT, and as long as you can still act in the best interests of PKCT and follow PKCT policies and standards.

If you want to hold a senior role in a political party you will need to get PKCT approval, as the position would have a high public profile and involve a lot of your time.

12. THE WAY WE USE OUR BUSINESS RESOURCES

12.1 Confidentiality

You are required to protect all confidential information about PKCT while you are employed at PKCT, and after you leave. Confidential information includes things like activities, results or plans that have not been made public.

Confidential information must be treated carefully and you must not tell anyone outside PKCT about it without getting your Line Leader's approval. You must never use it for personal gain.

This policy applies to consultants, contractors, suppliers, customers, agents and third parties and if you arrange business with any of these, you must ensure that confidentiality provisions are included in the written contracts.

If you have access to confidential or sensitive information, you are responsible for ensuring that there is a system in place to protect it.

Personal information about employees and other people is explained in "Privacy of Personal Information".

Q: I'm reading an internal report that contains some confidential information about PKCT's activities. Some of my friends outside work are interested in these kinds of activities. Is there any harm in discussing the report with them in general terms?

A: You must not discuss confidential Company information with friends, family members, or anyone else outside PKCT, in specific OR general terms. It doesn't matter whether you got the information directly (you did the calculations or read the information) or indirectly (you overheard a conversation).

12.2 Insider Trading

It is breaking the law to buy or sell shares of a company if you have material information about that company that has not been made public.

At PKCT, you might become aware of a transaction involving a customer or supplier company that hasn't been made public yet. If you did, and you used this information to buy or sell shares on the basis of your knowledge, it would be a breach of the insider trading laws.

12.3 Intellectual Property

Any work you do for PKCT belongs to PKCT; it is PKCT's "intellectual" property. It includes documents, drawings, calculations, designs, inventions, reports, spread sheets, diagrams, software, applications and multimedia works, and also includes work that you do for PKCT outside normal working hours or offsite.

This information belongs to PKCT while you are employed, and after you leave. You are not permitted to remove any of PKCT's intellectual property if you leave PKCT, without the express written permission of the General Manager.

PKCT is entitled to the exclusive benefits of any patents relating to or resulting from your work. You may be asked to enter into confidentiality agreements or to assist PKCT to patents or trademarks.

Q: I would like to publish a paper containing the results of research I have done while working for PKCT. I think it would be good for my professional development. Is this allowed?

A: The research results are PKCT's intellectual property, so you must get permission from the General Manager to use them for your paper. The General Manager will also consider whether the results are confidential or sensitive before approving your request.

12.4 Public Release of Company Information

Only the General Manager may speak on behalf of PKCT and authorise the public release of PKCT information.

This includes brochures, press releases, and reports for government departments, which must all be approved by the General Manager before they are made available outside of PKCT.

If you are asked to speak publicly about issues that relate to PKCT, you must get permission from the General Manager. If you do get permission, the speech and/or presentation must also be approved by the General Manager before it is delivered publicly.

You must not comment publicly about PKCT or on behalf of PKCT, without permission from the General Manager.

The General Manager can delegate this authority to others as appropriate.

Q: A reporter for a local newspaper has just called and asked me whether the recent rainy weather has caused any overflows to the harbour. I know it hasn't, should I give her the answer?

A: Only the General Manager can speak on behalf of PKCT. Explain politely that you aren't authorised to answer and you are happy to pass on their details to the person who is. Take down her details if you don't have them already, including what it is that she wants to discuss and any deadline she is trying to meet, and get the information to your Line Leader as soon as possible.

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12.5 Company Property

You must not use PKCT property, including funds, equipment, supplies and resources, for personal benefit. You are responsible for looking after the PKCT property that is under your control, including information, and for keeping accurate records of how PKCT property is used.

You need to take precautions to prevent theft, damage, or misuse of PKCT property. Unattended buildings, storage areas and PKCT vehicles should be locked when not in use. Keys to PKCT property must not be duplicated without management approval.

Removing PKCT funds, equipment, supplies or other resources is regarded as theft unless it has been approved before you remove it. Theft is a crime and can have serious consequences for you if you are involved. If theft is suspected, it will generally be reported to the police.

You must not sell, lend or donate PKCT property without management approval. You should only destroy or dispose of PKCT property without approval if the items are of small value and are of no further use, for example, office supplies. Intentional damage of PKCT property is prohibited.

Disposal of PKCT accounts, records and other documents should be done as per site standards and guidelines for the specific kind of information.

Refer to the “Private Use of PKCT Equipment Policy” for further information.

12.6 Fraud

Fraud is deceiving or tricking someone in order to get money or another benefit. Fraud is a crime, and if it happens, it can have serious consequences for PKCT and for any employees involved.

You must always use PKCT money sensibly and reasonably. Work-related expenses must be reported accurately and quickly; a fraudulent expense report is regarded as serious misconduct. All information that you record on PKCT’s behalf must be accurate, including records that are related to financial transactions but might not be financial information, such as timesheets or time records.

If you suspect that fraud has taken place, you must report it immediately to the General Manager or Business Services Manager.

Q: I need some extra time off this month. I am thinking about adding a few hours to my time sheet in order to get some extra time in lieu. I’ll make up the time later, so it’s really just an advance. Is this a problem?

A: Yes, it is a problem. PKCT, and the law, prohibits you from providing false information on time sheets to get a benefit – extra time in lieu – you haven’t earned. You would be falsifying Company records.

Q: My Line Leader sometimes uses her PKCT credit card to entertain friends. She says this is acceptable because she discusses work on these occasions, and PKCT owes her a few free meals for all the hard work she does. Should I process her credit card bills as PKCT entertainment expenses?

A: Your Line Leader has a PKCT credit card to cover PKCT business expenses, including reasonable entertainment expenses. In some situations, there will be a genuine business reason for your Line Leader’s partner to go with her to a business event and in this case, it is okay for her to pay for them with her PKCT credit card. However, if you genuinely believe that your Line Leader’s entertainment expenses are not work-related at all, you should not pay the bill. Tell her that you feel uncomfortable about the situation. If she insists that you pay the bills, raise the issue with the General Manager.

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12.7 Information Systems

You have access to a wide range of information systems to help do your job at PKCT, for example, computers, email, the internet, mobile phones, faxes, scanners, and voicemail. You are responsible to protect PKCT information that is sent by or stored on these systems.

All hardware, software and data must be protected from damage, loss, theft, alteration and unauthorised access. Sensitive transactions such as contractual commitment and money transfers must not be conducted electronically unless the security of the information can be guaranteed and the transaction is auditable.

Copying or selling proprietary software (for example, MS Word) is a breach of copyright law and is strictly prohibited.

PKCT's information systems are PKCT resources, and all electronic communications using PKCT systems are company records. Some personal use of PKCT information systems is okay, as long as it isn't related to outside business activities, and as long as it doesn't interfere with PKCT business or you getting your job done. Significant personal use is not allowed. You are not permitted to access social media such as Facebook using PKCT resources. If you have a genuine need to access a work-related connection site such as LinkedIn, you should speak with your Line Leader about getting approval for this.

You are not permitted to store, send, or download offensive material such as pornography on PKCT systems at any time. You also must not send, store or download material that could offend others due to their gender, age, race, disability, religion, for example, as this could be unlawful harassment under anti-discrimination laws.

You must also make sure that your emails, texts and other communications can't be read as offensive or bullying towards individuals or groups.

PKCT will monitor employee use of its information systems as needed, and does not guarantee the privacy of electronic communications or information stored on PKCT systems. Your messages and files may be accessed and disclosed intentionally if required, or as part of maintaining email systems and computer networks.

Some things you should do to ensure the security of PKCT's business information are:

- Don't give your computer password to anyone else, and don't write it down where others can find it.
- Don't give system or network access information to anyone who's not authorised to have it.
- Make sure you always have current virus protection software on any computer you use for work.
- If you use portable hard drives or USB "thumb" or "hard" drives, make sure they are scanned with current virus protection software.
- Don't open attachments from external email addresses that you don't recognise. They could contain viruses, or Trojan programs that allow someone else to access your files.
- Take particular care to scan files that have been obtained from external networks; and
- Double check that you are sending emails or faxes to the correct email addresses or fax numbers, before you send them.

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Q: I just saw a workmate looking at some pornography on his computer. What should I do?

A: Pornography of any kind is not allowed on any PKCT system. It may be offensive to others and is a misuse of PKCT property. You should report it straight away to Human Resources or your Line Leader and it will be investigated carefully. You can remain anonymous through the investigation process. If the investigation finds that the policy has been breached, then your workmate will be disciplined, and possibly dismissed, depending on the situation.

Q: If I'm not doing anything illegal, why would PKCT need to access my electronic mail, computer files, or other communications?

A: Sometimes, PKCT might have to get this information for a legal process, or to meet obligations to third parties, or under the laws relating to business records. The information belongs to PKCT, and it's better to make you aware upfront that it can and will be accessed if required.

Q: I sometimes use my office phone for personal business and my wife occasionally comes in to use it because it is too expensive to call overseas from our home. Is this a problem?

A: Yes. You're allowed to use PKCT phones for a small amount of personal use for local calls, but for long-distance personal calls you need to get management approval. Excessive personal use of PKCT phones is not permitted and use by friends or family is prohibited.

Q: I have been using the Internet to research some information for work. I've come across some sites that might be useful, but I'm barred from accessing them. Why?

A: The sites might contain offensive or inappropriate material, or they might be sites that PKCT has decided are not relevant to work and are likely to interfere with people getting their job done, such as social media sites. Internet access is logged and reviewed regularly. Ongoing inappropriate usage may lead to disciplinary action.

Q: My workmates sometimes e-mail interesting information that isn't really work-related. Am I allowed to receive and send this kind of information?

A: It depends on what kind of information it is, and how often you're getting it. A small amount of private use is acceptable, as long as it doesn't stop you from doing your work. Usage should be consistent with our standards of business conduct. The sending of jokes, "spam" or "junk mail" is not appropriate. Sending material which may offend others is also unacceptable.

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