

**GAMUDA**

# Code of Conduct



GEA-POL-HRA-002

Revision 03

## Revision History

Revision	Date	Amendment Description
01	15/04/2020	First Issue
02	08/06/2024	Revision
03	07/06/2024	Revision

## Issue

Designation	Name	Signature	Date
<b>Prepared by</b>			
<b>Reviewed by</b>			
<b>Approved by</b>			

# Ethical Business Practices

## Why do we have a Code?

This Code of Conduct (Code) sets the standards of behaviours expected of our employees.

Gamuda is committed to being respectful and ethical in everything we do. It is expected that our employees and all others involved in our business recognise this and adhere to this Code.

## Who does it apply to?

The Code applies to all Gamuda employees. There are no exemptions.

This includes permanent full-time and part-time employees, fixed term employees, casual employees and independent contractors engaged by Gamuda.

The Code is led by the Company Executive.

## Complying with the Code and our values

Complying with the law and doing the right thing is fundamental to this Code. It is often just common sense.

We must make ourselves aware of our policies and procedures that support this Code. They are all available in the company sharepoint,

For Gamuda Engineering Pty Ltd Employees: [Gamuda Sharepoint](#)

For DT Infrastructure Pty Ltd Employees: [DTI Sharepoint](#)

We must undertake all applicable training programs provided by Gamuda that are designed to help us understand and comply with this Code. Ignorance is not an excuse.

This code is underpinned by Gamuda's Values. Our Values describe the approach we take to our work and our relationships with each other, clients, contractors and other business partners.

By adhering to this Code, we are putting our Values into action every day.

If you are unsure of the Code or it's application, in most cases your direct manager should be your first point of contact. If in doubt or if you are uncomfortable, contact a member of the HR team.

## GAMUDA VALUES



Take Personal Ownership – we are all accountable for our results and must strive for excellence

Walk the Talk – we do what we say, live the Values and lead by example

Adopt Open, Honest Communication – we are open to others' views and opinions and are not afraid to discuss, resolve and move on

Demonstrate Real Teamwork – we actively work to break silos and work together across divisions

Develop our People – we strive to get the best out of our people and actively work with them on their development

# Health, Safety and Environment

## Be Safe. Always.



At Gamuda, we know that a responsible business is a sustainable business. We take our responsibilities seriously. The management of health, safety, environment and quality is no exception and forms an integral part of who we are and what we do every day. It underpins our "Be Safe" philosophy.

The key health and safety objective for Gamuda is to eliminate or minimise the risks of fatalities, injuries and incidents arising from our activities, irrespective of the task or project. We do not compromise when it comes to safety.

The Gamuda Health, Safety and Well-Being Policy provides the foundation for our commitment to providing safe and healthy workplaces and continuously improving Health and Safety performance.

This Policy and its associated policies and procedures, along with the Critical Risk Standards (CRS), address the fundamental elements and minimum requirements for our business to achieve this commitment.

### Putting into practice the Gamuda-way

All Gamudians must:

- play an active role in ensuring their own safety and the safety of others.
- Ensure that they fully understand and comply with Gamuda's Health & Safety policies, procedures and standards.

### In practice

Sally has been working for Gamuda as a Project Engineer for a few years and is now familiar with many of the work practices.

It's early on a Saturday and not many people are on-site. Sally notices some workers undertaking a task that she is not familiar with, but it doesn't look quite right.

Sally decides she better check in on them. She approaches the workers and says "I haven't seen this task done like this before. Are you confident that you're doing it safely?" They respond by saying "We've been doing this for years. We know what we're doing and who put you in charge of safety anyway?"

Sally isn't up for an argument so she accepts their answer and leaves.

Did Sally follow the principles of the Code?

Up to a point. It was good that she questioned the workers, however she should have known the answer was not acceptable and sought advice from a more senior person on-site.

### Ask yourself

- Should I have walked past that?
- Do I have the right skills?
- Have I made sure everybody is working safely?
- **Who can I talk to about this to ensure that it doesn't happen again?**

# Health, Safety and Environment

## We must work to improve the environment.

We only have one planet and we must walk lightly upon it and protect it for future generations. We acknowledge that we have a moral and legal responsibility to safeguard the environment. We must strive to achieve sustainable outcomes for our stakeholders and give all social and environmental impacts our full consideration when making business decisions.

### Putting into practice the Gamuda-way

- I will play an active role in safe-guarding the environment.
- I will ensure that I fully understand and comply to Gamuda's environmental policies, procedures and standards.
- I will actively look for ways to do things better to reduce my carbon footprint by recycling, and reducing waste, water and greenhouse gas emissions.

## We must not be influenced by alcohol and/or drugs at work.

The use and misuse of alcohol and/or other drugs can affect work performance and jeopardise the safety and welfare of everyone around us. We must not perform our work, remain in the workplace or undertake work-related activity if we are impaired by alcohol and/or other drugs. We are considered 'unfit for duty' if we have consumed alcohol or have taken drugs (legal or illegal) that have weakened our abilities and coordination. We must understand and comply with the requirements of our **Fitness for Work Procedure**.

### Putting into practice the Gamuda-way

- I will let my direct manager know if I am required for medical reasons to take any medication that will affect my ability to perform my role.
- I will consume alcohol responsibly at business functions and only return to work as required, provided there is no impairment.
- I will comply with the Fitness for Work Procedure.



# People

## We must treat everyone fairly.

*Every person at Gamuda has the right to expect to be able to work in a place that is inclusive and respectful, that treats people fairly, and free of discrimination, harassment and bullying.*

Gamuda is an equal opportunity employer and opposes discrimination in any form. We do not discriminate. We do not make business decisions and do not treat people differently based on race, colour, religion, sex, sexual orientation, national origin, disability, health status, marital status, family responsibilities or political affiliation. **We encourage a diverse, multi-cultural environment that is respectful and inclusive.**

### Putting into practice the Gamuda-way

- I will treat others the way I would want to be treated.
- I will conduct myself professionally and help promote an inclusive culture where everyone feels welcome.
- I will share information, teach others, provide constructive feedback, and have a commitment to everyone's training and growth.

## We must treat everyone with respect.



**We do not tolerate workplace bullying and harassment under any circumstances.** We must not engage in actions or behaviours that would be considered harassment or bullying. Social media, both in and outside of work, must not be used to offend, discriminate against or harass our co-workers, contractors or other business partners.

### Putting into practice the Gamuda-way

- I will learn, understand and comply with Gamuda's Workplace Bullying and Harassment Policy.
- I will act in a professional manner at all times.
- I will be a team player and be open and honest with others
- I will speak up if I see or suspect discrimination.
- I will not cause any harm or embarrassment to any of my co-workers or business partners through social media.

*Bullying is typically repeated, unreasonable behaviour directed toward a person or group of people that creates or is likely to create a risk to health, safety or wellbeing.*

### In practice

Chee is on a construction site and witnesses some subcontractors he works with wolf whistling at a woman walking past the site. From the look on the woman's face and the increased pace in her walk, Chee is pretty certain the subcontractors have made the woman feel uncomfortable by their behaviour. Despite this, Chee carries on with what he is doing.

**Has Chee followed the Code of Conduct?**

No, although Chee did not participate in the harassing behaviour, ignoring the behaviour is not consistent with our Code. He should have stopped the behaviour or sought assistance from his direct manager.

### Ask yourself

- Am I proud of the way I treat my co-workers?
- Have I considered how my actions may affect others?
- Have I called out unacceptable behaviour when I have witnessed it?

## Business Practices

### We must not disclose confidential or sensitive information.

We are required by law to protect employee, client, contractor and supplier rights to privacy. Confidential or sensitive information includes all information relating to Gamuda and its business affairs that are not in the public domain.

#### Putting into practice the Gamuda-way

- I will do everything reasonable and within my power to protect the security of personal information I handle during my employment.
- I will not use Gamuda's confidential or sensitive information for personal benefit or the benefit of anyone else.
- I understand that my obligations to protect Gamuda's confidential information continues after my employment ceases.

### We are aware of real and potential conflicts of interest

*A conflict of interest is a situation in which a person is in a position to derive personal benefit from actions or decisions made in their official capacity.*

We must avoid any circumstances that may be, or create the appearance of conflicting with Gamuda's business interests. A conflict of interest may also occur as a result of secondary employment, external directorships or personal investments. All real and potential conflicts of interest must be disclosed to your direct manager or the HR team.

#### Putting into practice the Gamuda-way

- I will disclose to my direct manager any interest that may conflict or be perceived to conflict with Gamuda, or that may adversely affect Gamuda.
- I will avoid situations in which my personal interest conflicts with that of Gamuda.





# Business Practices

## We must be free of self-interest when exchanging gifts and entertainment.



Even when gifts or entertainment are exchanged out of the purest motives of personal or professional friendship, they can be misunderstood and perceived as an improper advantage to create influence.

**We must not give or accept any gifts or entertainment that could raise any concerns regarding our personal integrity or Gamuda’s integrity and independence.**

At Gamuda, gifts and entertainment must not be accepted unless they are declared and authorised.

Determining what is occasional and of modest value is a matter of judgment and monetary value should be considered. As a guide, the higher the monetary value of the gift or entertainment, the greater the level of transparency that is required. For example:

- A Christmas gift (valued less than \$200) would be considered modest.
- An invitation to a sporting or entertainment event where the value is less than \$500 would be considered modest.
- An invitation that includes airfares, accommodation and entertainment should be discussed and agreed with the relevant Head of Department or Country Director.

Regardless of the value of the gift or entertainment, you must always disclose it to your direct manager as soon as you become aware of it.

### Putting into practice the Gamuda-way

- I will not accept a gift or entertainment where its purpose is to influence a business decision.
- I will not provide a gift or entertainment to influence a business decision.
- I will disclose any gifts or entertainment to my direct manager.

### In practice

Sam is working on one of Gamuda’s biggest tenders for the year. Over the years, Sam has built some amazing relationships with suppliers and subcontractors, some of whom are tendering for this major project. Outside of work, Sam is a number one supporter of his local rugby league team.

So, when one supply company tendering for the project puts in a pretty competitive bid for the work, along with tickets to the Grand Final, where Sam’s team are playing, he can’t believe his luck. Sam thought it was such a thoughtful gesture he felt obliged to award the work to the supplier.

**Has Sam followed the Code of Conduct?**

**No, Gamuda does not support the giving or accepting of gifts that influence decision making. Sam should have also notified his direct manager of the gift.**

### Ask yourself

- Did the gift influence my decision?
- Could the value and frequency of the gift or entertainment place me under any obligations.
- Am I only offering what I would be comfortable to accept myself, and vice versa?

# Business Practices

## We must be honest and transparent in business transactions.



We must always conduct ourselves honestly and with transparency. Any form of exploitation in business dealings, such as fraud, bribery or corruption for company or personal advantage is prohibited.

We must ensure that information we prepare is honest, accurate and timely. Falsifying or creating misleading information can constitute fraudulent behaviour.

### Putting into practice the Gamuda-way

- I must be accurate and complete in recording payments.
- I must not accept bribes of any kind and speak up if I see or suspect a bribe.
- I will act honestly and not choose to ignore or cover-up improper or dishonest behaviour.
- I will not offer or facilitate a direct or indirect payment for the purpose of obtaining a commercial advantage or attempting to circumnavigate the law.

### In practice

Sally is currently working on a roads project. She has instructed the concreting subcontractor to purchase all materials from a specific supplier, Concrete 2 U Pty Ltd.

Privately Sally has arranged a deal with Concrete 2 U Pty Ltd so she will personally receive a rebate for any supplies ordered for Gamuda projects.

**Has Sally followed the Code of Conduct?**

No, Sally made an arrangement to personally gain from a transaction that should have been for Gamuda's benefit.

### Ask yourself

- Have I told the whole truth or am I covering something up?
- Am I undertaking an honest and proper business transaction without gain to myself?
- Have I noticed someone else undertaking a potential dishonest transaction?

# Business Practices

## We must not misuse company assets.



We respect and protect Gamuda's assets and resources and ensure their efficient use. Theft, carelessness and waste of our assets have a direct impact on our business' ongoing success. Our assets are both tangible and intangible and include our facilities and equipment, materials and supplies and information technology networks. Assets also include intellectual property, our ideas and know-how, client and supplier information, and our reputation.

Use of Gamuda's assets for non-business purposes is not acceptable unless approved by a Director.

### Putting into practice the Gamuda-way

- I will keep company assets safe and protect them from being misused, stolen or damaged.
- I will not let unauthorised persons use company assets.
- I will not steal or misuse company assets.

## In practice

David and Sally have been working together for years. They are currently working together on a tunnel project with a spectacular roof lighting system. The lights that were first delivered for the roof had a defect in them and consequently the subcontractor was required to re-supply the lights.

The subcontractor told David and Sally that he was happy if they could 'get rid' of the defective lights as he had received a credit for them from the supplier anyway.

Sally found a supplier that was willing to pick up the defective lights and was happy to pay \$800 cash for each of the forty pallets of defective lights. Sally approached David about it, and they both agreed they would split the money 50/50. They both figured it was no point mentioning anything to the project team as the lights were not going to be used anyway.

**Have David and Sally followed the Code of Conduct?**  
No, David and Sally have sold company property without permission and personally gained from the transaction.

## Ask yourself

- Have I misused company assets?
- Have I used company assets efficiently?

# Business Practices

## We must not speak on behalf of the company.



We make sure that information shared about our company is consistent, accurate and complete.

In order to ensure accurate and complete information is conveyed to the public, the regulatory authorities and to others, we have designated individuals who are our official company spokespersons. Unless you are specifically authorised by the Executive Group, do not make any public statements on behalf of Gamuda or give information to the media relating to Gamuda.

Opinions, comments or endorsements made by social media platforms are considered as public as if we are making the comments to the media or at a public forum.

Gamuda requires that any use of social media sites by employees both inside and outside of work hours is consistent with this Code and Gamuda's policies and procedures, to ensure that it does not damage Gamuda's reputation, particularly when it can be associated with Gamuda in any way.

### Putting into practice the Gamuda-way

- I will refer all media enquiries and public interest requests for information to the Construction Executive Group.
- I will not post confidential business information on social media.
- I will use social media both inside and outside of work in accordance with this code.

# Business Practices

## We do not condone modern slavery.

### We must prevent any use of modern slavery or human trafficking in our business dealings.

Gamuda will ensure that our business partners with whom we work (including joint ventures, subcontractors and suppliers) are not involved with slavery or human trafficking. We must be vigilant and we will, through our due diligence program, seek to prevent the use of slavery in our supply chains.

### Putting into practice the Gamuda-way

- I will ensure I meet the due diligence requirements for subcontractor engagement.
- I will not ignore reasonable evidence of slavery within our supply chain.
- I will report any evidence or suspicion of modern slavery.
- I will cooperate with any investigation on modern slavery.

*Modern Slavery includes forced labour, sexual slavery, child labour, domestic servitude, debt bondage and human trafficking.*

## We must report any real or potential breaches of this Code.



We must report any real or potential breach of this Code to our direct manager or HR team. If you are a manager, you have a responsibility to ensure that reports of suspected or known breaches of the Code are adequately addressed.

For some reports, the most appropriate course of action may be to direct the matter to your relevant Director, Human Resources or a member of the Executive Group.

We will promptly investigate any concerns or issues you report, and take appropriate action based on the findings of our investigation.

### Putting into practice the Gamuda-way

- I will report any real or potential breaches of this Code.
- If an alleged breach of this Code is reported to me, I will ensure the matter is directed to the most appropriate person.

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## Acknowledgement of understanding

I hereby acknowledge that I have read and understood the content outlined within the Code of Conduct, and agree to uphold the principles outlined throughout the Code:

Full name:

Signature:

Date: