



CODE OF ETHICS AND CONDUCT



ACKNOWLEDGEMENT OF COUNTRY

Pilbara Ports acknowledges the Traditional Owners of the land and waters in which it operates – Kariyarra (Port Hedland), Thalanyji (Ashburton), Yaburara, Mardudhunera, Ngarluma, Wong-Goo-Tt-Oo, Yindjibarndi (Dampier), and Whadjuk Noongar (Perth) – and pays its respects to Elders past and present.



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CEO FOREWORD

At Pilbara Ports, we are privileged to be managing some of the world's largest and most important ports. We perform this responsibility on behalf of our owners, the people of Western Australia, who rightly expect from us the highest levels of professional conduct.

We hold our positions on the public trust, that we act ethically and with integrity, seeking solely to advance the best interests of our customers, community and our owners.

For our organisation to be successful, we must maintain a workplace where our people live our values and follow our Code of Ethics and Conduct. Our values guide our decision-making and behaviours, and along with this Code of Ethics and Conduct, are a clear statement about what we expect from ourselves and each other.

All of us, no matter our role, need to understand the Code of Ethics and Conduct and make sure our actions and decisions are aligned to it. Our standards are rightly high, as befits an organisation with a critical responsibility for the prosperity of WA.

Crucially, the Code of Ethics and Conduct contains information on how to speak up when we see something that feels wrong and confirms our commitment to support and protect those that do.

Please make sure you take the time to understand the Code, and I ask that each one of us upholds the conduct and values that it outlines.

Samuel McSkimming
Chief Executive Officer



OUR VISION

Our ports connect the possibilities of the Pilbara to the world so our customers and communities thrive.

INTRODUCTION

Pilbara Ports workplaces are inclusive, positive, and productive, where people are valued, respected and belong. Our Code of Ethics and Conduct sets out the standard of behaviour expected of our Board members, employees, trainees, cadets and contractors (including labour hire).



CODE OF ETHICS

Personal integrity

We act with care and diligence and make decisions that are honest, fair, impartial, and timely, and consider all relevant information.

Relationship with others

We treat people with respect, courtesy, and sensitivity, and recognise their interests, rights, safety and welfare.

Accountability

We use the resources of the State in a responsible and accountable manner that ensures the efficient, effective, and appropriate use of human, natural, financial and physical resources, property and information.

CODE OF CONDUCT

Safety

We are committed to ensuring everyone goes home safe and healthy every day. We do this by:

- Contributing to a harmonious, safe, and productive work environment.
- Providing an environment free of harassment, bullying or unlawful discrimination.

Excellence

We take pride in our work and strive to improve. We do this by:

- Acting fairly, impartially, and promptly, considering all available information, legislative requirements, policies and procedures and without bias.
- Making informed decisions and giving due consideration to all points of view.

Teamwork

We value difference and do our best work when we collaborate, challenge, and back each other. We do this by:

- Treating people with respect, courtesy, honesty and fairness, having proper regard for their interests, rights, safety and welfare. We ensure that these qualities of conduct are exhibited in all our interactions.
- Being sensitive to the differences between people and understanding that people have many ways of contributing in the workplace. We value the participation of people with different genders, abilities, backgrounds, cultures, religious beliefs, and ethnicity.





CODE OF CONDUCT

Integrity

We deliver on our commitments and always act honestly and objectively. We do this by:

- Engaging with openness, honesty, and transparency in our dealings.
- Ensuring that people are made aware of their rights and are not disadvantaged or treated unfairly.
- Not making improper use of official information obtained in our daily duties for direct or indirect personal or commercial gain for ourselves or others, or to do harm to others.
- Not dishonestly obtaining or attempting to obtain an unfair or unlawful benefit or advantage for ourselves or another individual or entity, or dishonestly cause or attempt to cause a detriment to others.
- Reporting any information about actual or potentially fraudulent, corrupt or illegal activities, or the mismanagement of public resources, to Pilbara Ports Public Interest Disclosure Officer.
- Being objective in carrying out our responsibilities and developing and following Pilbara Ports policies, procedures, and processes, to ensure personal profit or motive does not bias our judgment or affect our impartiality.
- Declaring and managing any conflicts of interests, gifts, and benefits in accordance with our Conflicts of Interest, Gifts and Benefits Procedure.

Care

We care for and respect our people, communities, and environment. We do this by:

- Ensuring constructive and cooperative relationships are built between Pilbara Ports and other public sector agencies, in order to work together to achieve outcomes that benefit the people of Western Australia.
- Keeping good records of our decisions and actions and the reasons for them to assist transparency.

REPORTING

We understand the consequences of misconduct and actions that may be taken if we do not comply with the Code of Ethics and Conduct; and we understand that we have a responsibility to, and will, report any breaches of the Code of Ethics and Conduct to a Supervisor, Manager or the Executive General Manager Safety, People and Environment, in the case of a breach by Employees and Contractors, and to the Chair or Chief Executive Officer or Corporate Secretary, in the case of a Board Member.

Given their leadership and oversight role on matters of corporate culture, breaches of the Code of Ethics and Conduct will be reported to the Executive Committee and Board on a regular basis. Reporting of non-compliances with the Code of Ethics and Conduct will be included in Pilbara Ports Annual Report.

Depending on the nature of the breach, reporting to Pilbara Ports Public Interest Disclosure Officer may be appropriate, in accordance with Pilbara Ports Public Interest Disclosure Procedure.

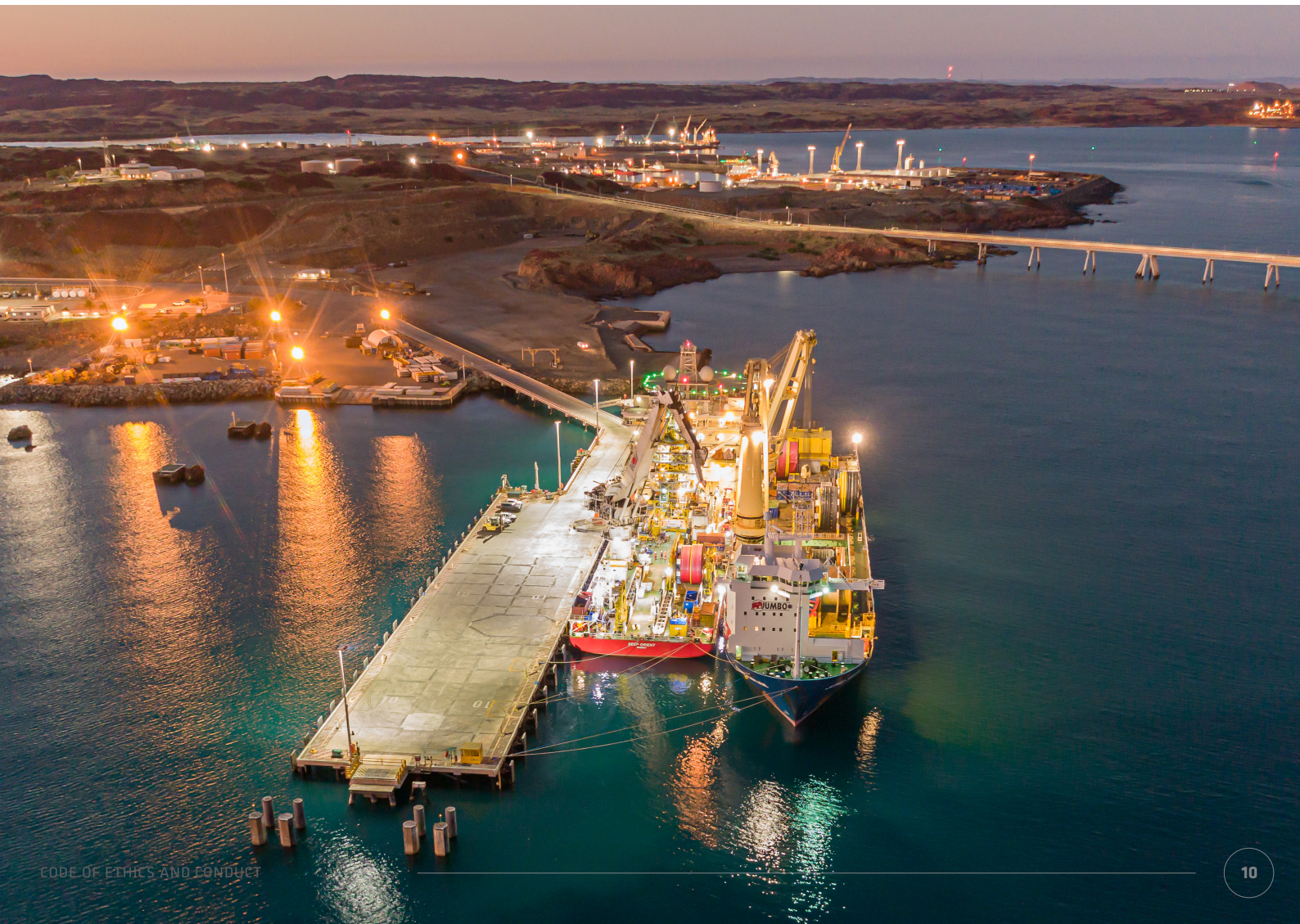


BREACHES OF THE CODE OF ETHICS AND CONDUCT

Investigations into breaches of the Code of Ethics and Conduct will be carried out in a fair, impartial, and prompt fashion in accordance with Pilbara Ports procedures.

Breaches of the Code of Ethics and Conduct will be dealt with in accordance with Pilbara Ports Fraud and Corruption Control Plan and Discipline Procedure, which may include reporting such breaches to the Public Service Commission or Corruption and Crime Commission as appropriate. Breaches of the Code will be reported to the Safety, Risk and Audit Committee.

Breaches of the Code of Ethics and Conduct by a Board Member may also be managed in accordance with the Board of Directors Charter.





FURTHER INFORMATION

Board Members, staff members and contractors can contact the Corporate Secretary for guidance and queries in relation to the Code of Ethics and Conduct. Pilbara Ports employees are required to undertake Working Well Training, which addresses the content of this Code of Ethics and Conduct, every two years.

This Code of Ethics and Conduct should be read in conjunction with the relevant Pilbara Ports policies and procedures, including:

- Conflicts of Interest Gifts and Benefits Procedure;
- Fraud and Corruption Control Plan;
- Public Interest Disclosure Procedure;
- Corporate Delegations Manual;
- Social Media Policy;
- Discipline Procedure;
- Workplace Issue Procedure; and
- (for Board Members), the Board of Directors Charter.

Unless required sooner, this Code of Ethics and Conduct will be reviewed every two years.

PROCESS OWNER

The Chief Executive Officer is responsible for the implementation of this Code of Ethics and Conduct. The Board is collectively responsible for approving and monitoring the implementation of this Code of Ethics and Conduct.

Document owner

The Executive General Manager Safety, People and Environment is responsible for the Code of Ethics and Conduct.

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