

# + Company Policy

## Code of Conduct

**SBP Group believe that a prosperous business begins with exceptional standards that guide the legal, honest, safe and ethical undertaking of all operations.**

Our Code of Conduct encapsulates all Company policies and puts our core values: “enterprising”, “passion”, “accountability”, “diversity”, “safety” and “quality excellence” in action.

Promoting a culture of fair and virtuous behaviour, the Code of Conduct applies to everyone that works at SBP Group, including our directors, employees, contractors and business partners. It is designed to deliver trust and confidence in the way we work, providing the internal and external framework for compliance with state and commonwealth laws and standards, as well as principles around fairness, impartiality, honesty and equity in the decisions we make.

The Code presents our expectations of all people working for SBP Group and serves as a resource to guide responses to any challenging choices and situations that may arise in the workplace. Everyone engaged by SBP Group must be familiar with and be personally accountable in upholding the Code as a term and condition of employment.

### + ASSESSING YOUR SITUATION

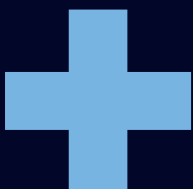
While the Code attempts to deal with common issues that may be encountered by SBP Group directors, employees, contractors and business partners, it cannot address every possible scenario. When you're not sure what to do, ask yourself the following questions:

- + Is it legal and ethical?
- + Does it align with our core values?
- + Does it feel like the wrong thing to do?
- + Would you feel uncomfortable if others knew about it?
- + Could it create a negative perception of you or damage company reputation?
- + Do you have a personal interest that could conflict with the company's interest?

If you answered “yes” to any of the above questions or still feel unsure about the right thing to do, you should seek further guidance from a supervisor or the Group's human resources department.

#### The core principles of our Code of Conduct Policy are to:

- + Promote and support the Code in day-to-day business activities, both in personal leadership and adoption of best business practices
- + Read, understand and follow the laws and regulations relevant to all employee activities and the underlying policies and practices applicable to each role
- + Encourage consultation and questioning around the appropriate course of action, including sharing resources available to support decision making regarding application of the Code
- + Participate in relevant compliance training and certifications required by SBP Group or associated governing, state and commonwealth bodies
- + Report and encourage the reporting of suspected violations of the Code
- + Ensure employees, contractors and stakeholders cooperate with any investigations into potential misconduct



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Our Code of Conduct is organised in to 10 categories containing guiding principles that should be used by everyone at SBP Group to guide our behaviour:

1. Employee Conduct
2. Health & Safety
3. Environment & Sustainability
4. Equity, Diversity & Social Inclusion
5. Conflicts of Interest
  - Gifts, Entertainment & Hospitality
  - External Activities, Employment and Private Practice
6. Use of Company Resources
7. Privacy, Confidentiality & Intellectual Capital
8. Breaches & Grievances

### + EMPLOYEE CONDUCT

SBP Group expects its employees to perform their duties and:

- + Adhere to this Code of Conduct and comply with the provisions of the Group's business policies, rules and procedures
- + Treat members of the public, team members, contractors, business partners and stakeholders with courtesy and sensitivity
- + Stay up to date with technical advances and changes to construction methodologies, as well as professional and ethical standards relevant to their role and area of expertise
- + Maintain adequate records to support any decisions made
- + Avoid undertaking activities that could potentially compromise the performance of work duties
- + Maintain appropriate confidentiality of sensitive information

### + HEALTH & SAFETY

Our elite fitout and construction solutions start with the health and safety mindset of our people. At SBP Group, we've created a work environment that is committed to effective communication and consultation, systematic identification, assessment and control of hazards, and the encouragement of innovation to eliminate or reduce risk.

Employees, contractors and business partners must take care not to put themselves or other stakeholders at risk or reduce their ability to carry out their duties through unsafe practices, inappropriate behaviour or the misuse of alcohol or drugs. Every effort should be made to ensure that staff are safe and secure on both our sites or client sites, or when representing SBP Group externally at industry functions or events.

All personnel must immediately report any hazards, incidents or near misses to a line manager, as well as any resulting injuries. The line manager will report incidents to the Group's health and safety representative immediately.

Group employees, contractors and business partners are required to perform their duties in a safe and competent manner according to SBP Group Policies and in line with all relevant legislation and standards including: Building Codes of Australia, Australian Standards, Fair Work Act and the WA Industrial Relations Act.

Further details are set out in our **Work Health and Safety (WHS) Policy**.



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### + ENVIRONMENT & SUSTAINABILITY

Our curious and innovative nature drives us to constantly refine our commitment to achieving sustainable environmental, social and economic outcomes through new ways of thinking. SBP Group adopt sustainable approaches to building and construction across three pillars – ecological, social and economic to ensure we positively contribute to the wellbeing of society and ensuing generations. Our systems and processes reflect the ISO 14001 environmental accreditation standard requirements.

SBP Group will monitor and manage all activities in order to prevent or minimise pollution; respect and protect our community, cultural and heritage sites; protect flora and fauna and the natural surroundings; and preserve biodiversity. Additionally, we are committed to employing local tradesman and suppliers, as well as the utilisation of locally sourced materials and Australian-made materials where achievable.

All employees, contractors and stakeholders are expected to understand and follow the environmental and sustainability policies and regulations applicable to their line of work, including the Group's **Environment & Sustainability Policy**.

### + EQUITY, DIVERSITY & SOCIAL INCLUSION

SBP Group conducts its business in a manner that respects the rights and dignity of all people and promotes a workplace free from bullying or discrimination. In respecting different cultures, traditions and employment practices, we share common goals and a unifying set of beliefs and behavioural expectations through our company policies.

Our employees have the right to work in an environment in which they have equal opportunity to develop their skills to the highest level. SBP Group is committed to providing a workplace that is inclusive of workers without prejudice or favour based on gender, age, race, religion, political conviction, sexual orientation, industrial association, health status, disability or marital status.

SBP Group employees, contractors and stakeholders are expected to understand our **Equal Opportunity Policy**, as well as demonstrate dignity for others by valuing diverse backgrounds, experiences and ideas present among colleagues and locations where the Group operates.



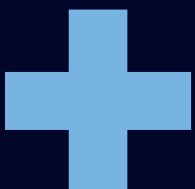
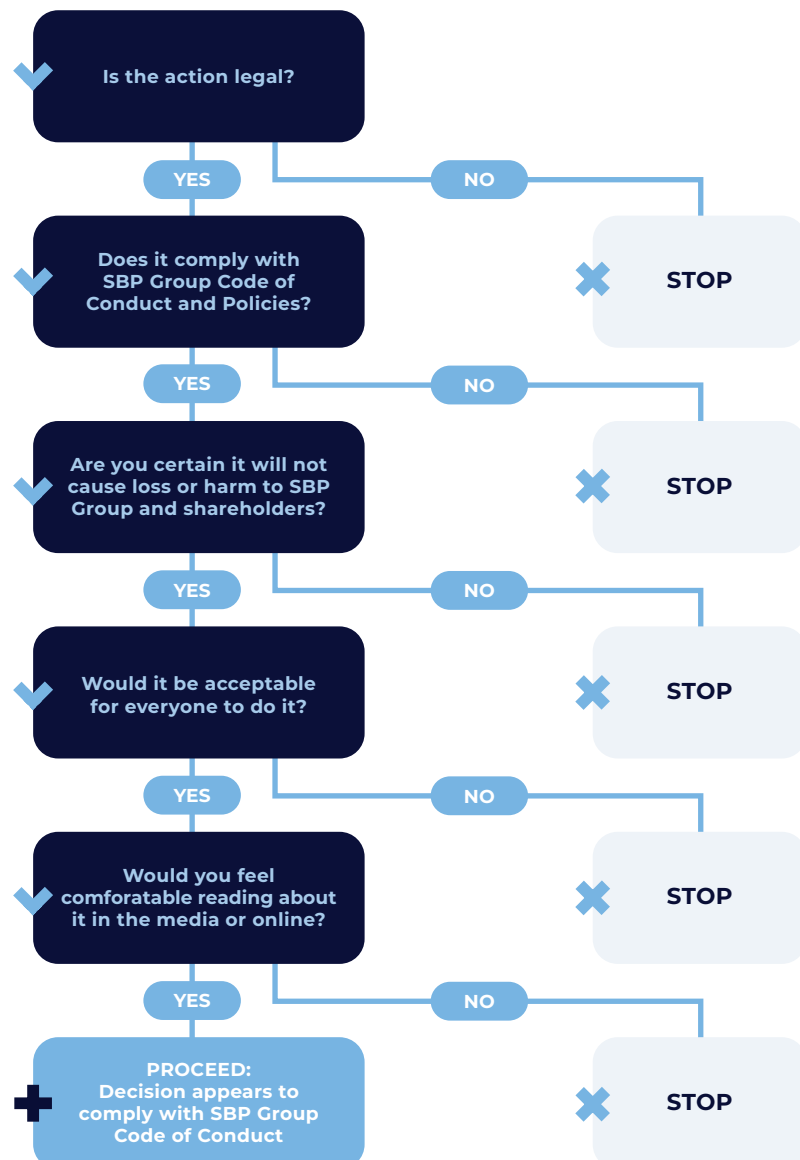
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## + CONFLICTS OF INTEREST

SBP Group employees must not engage in activities which involve, or appear to involve, a conflict of interest. Such circumstances could compromise the Group's ability to make impartial business decisions.

The Group respects employee, contractor and business partner rights to engage in financial, business and other activities outside of work hours, however these activities or situations should not conflict with personal responsibilities to SBP Group and or impact the impartial performance of duties. Employees should refrain from engaging in activities that could damage SBP Group's reputation or undermine its relationships.

All Group employees, contractors and business partners are expected to perform their duties and handle internal and external relationships with integrity at all times, in the best interest of the company. Any actual or perceived conflicts of interest must be immediately reported to SBP Group management in writing.



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## Code of Conduct

### + GIFTS, ENTERTAINMENT & HOSPITALITY

A conflict of interest can occur when an employee is offered a gift, favour or entertainment. While this activity often constitutes part of a normal business relationship, it becomes an issue when the gift, entertainment or hospitality has a value greater than we could reasonably reciprocate, or appears to obligate us to act in a way contrary to the law, against our values or without consideration for SBP Group's best business interests. Any gift, entertainment or hospitality that may in any way compromise or influence an individual's capacity as an SBP Group employee is prohibited under any circumstances.

Monetary gifts (bribes) are not to be accepted in any case, nor do we pay bribes in furtherance of our business. If an SBP Group employee or contractor is offered a bribe the incident must be reported to the relevant Group manager immediately, and if an employee is unsure of how to respond to an offer, they should seek advice immediately from the relevant manager.

### + EXTERNAL ACTIVITIES, EMPLOYMENT & PRIVATE PRACTICE

SBP Group encourage its employees, contractors and business partners to be proactive and responsible members of the communities in which we live, serve and participate. This extends to contributing and engaging through giving assistance to industry bodies, government, community agencies and professional bodies via a range of activities including consulting, advisory work and participation on committees. In upholding SBP Group's reputation, we expect employees to use good judgement and meet the following requirements:

- + Gain supervisor/managerial approval prior to undertaking external activities during agreed work hours and providing necessary assurance that these activities do not conflict with employment duties
- + Gain supervisor/managerial approval where SBP Group resources are to be utilised for external activities or require reimbursement

### + USE OF COMPANY RESOURCES

All SBP Group employees, contractors and business partners are responsible for the efficient, economic and authorised use of company property, funds, facilities and or services, and should only be utilised in accordance with delegated financial authority. Company employees, contractors and stakeholders must report damaged or defective equipment and facilities to a relevant supervisor immediately, as well as act to ensure that where there is a compromise to health and safety, sufficient action is taken to protect any individual from danger.

An accurate and auditable record of all financial transactions relating to SBP Group must be maintained in accordance with generally accepted accounting principles. No entry should be made in SBP Group's records that distorts or disguises the true nature of any transaction.



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## Code of Conduct

### + PRIVACY, CONFIDENTIALITY & INTELLECTUAL PROPERTY

SBP Group respects and protects the privacy of all customer, employee, contractor and business partner confidential information which is collected for business purposes. The Group treats information in our possession just like an asset, and put in place reasonable measures to safeguard the security and confidentiality of company records.

The Group may use or disclose personal information only where authorised by the party concerned and where necessary to prevent a serious threat to health and safety, or for the purpose of law enforcement.

Confidential information may include, but is not limited to:

- + Medical information
- + Business plans, designs, drawings, techniques & processes
- + Project management systems
- + Trade secrets
- + Marketing information
- + Customer lists
- + Price lists & financial information
- + Research and development
- + Trademark & copywrite materials
- + Intellectual property / information technology

SBP Group is legally required to adhere to orthodox records management processes and procedures, including the on-file documentation of the Group's public records. SBP Group employees, contractors and stakeholders are not permitted to damage, dispose of or interfere with official documentation or company files. The destruction of records may only take place in accordance with an approved disposal and retention schedule.

All SBP Group employees, contractors and stakeholders have a responsibility to ensure that confidential and sensitive information cannot be accessed by and is not disclosed or discussed with unauthorised personnel. If a Group employee, contractor or business partner has access to confidential information as part of carrying out duties, the individual is expected to comply with the Code, and refrain from accessing information other than for necessary work-related purposes.

SBP Group reserves the right to retain ownership of intellectual property created by employees in their course of employment unless a prior agreement states so.



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### + BREACHES & GRIEVANCES

SBP Group has various means to raise concerns of unsafe, unethical or illegal business conduct, including any behaviour which may be in breach of this Code.

Where a breach or grievance is reported, an employee can:

1. Speak to an immediate supervisor
2. Speak with a site representative, or
3. Email our dedicated business conduct manager via [bernard@sbp.com.au](mailto:bernard@sbp.com.au)

SBP Group has a responsibility ensure that personnel who make such reports are supported and wherever possible are protected from any detrimental consequences as a result of their disclosure.

All company employees, contractors and business partners should note that breaches of certain sections of this Code could result in heavy fines or prosecution. Breaches may also result in company disciplinary action, including termination of employment and contractual agreements.



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**Bernard Wearden**  
Managing Director



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**Ryan Gray**  
Managing Director

March 2020

