



# Shaw

## Code of Conduct

SAFETY. TEAMWORK. INTEGRITY. RESPONSIBILITY.



**Shaw** KOBELCO  
People Working Together For The Future

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# Message from our CEO

**Our Code of Conduct sets a clear and consistent standard of behaviour expected from all our people, including employees of our subsidiaries, joint ventures, contractors and suppliers.**

It provides a single point of reference to ensure we work safely, behave ethically, and act in accordance with the laws and regulations that govern our business. Our Code reflects the values that define us: Safety, Teamwork, Integrity and Responsibility.

Our Code of Conduct guides how we work with each other and with our customers, suppliers, contractors and the broader community. It strengthens our relationships, inspires confidence in how we operate, and protects our people and our reputation.

Regardless of your role or the nature of your work, every member of the Shaw team is required to read, understand and apply this Code in everything they do. If you are ever in doubt, speak with your manager or Manager People & Systems.

Thank you for your commitment.



**Joe Luttrell**  
Chief Executive Officer

**This Code sets out Procedure Requirements and Conduct Principles that define the minimum standard of behaviour expected of all Shaw people. Our policies and procedures support each principle and are accessible on ShawWork. Where the Code's requirements exceed local law, the Code always takes precedence.**

## Who must comply with this Code of Conduct?

Our Code of Conduct applies to:

- ✔ Everyone who is an officer, director or employee (whether full time, part time or casual) of Shaw Contracting, or its subsidiaries and related companies.
- ✔ Shaw Contracting partners including clients, suppliers, visitors contractors, subcontractors, consultants, joint venture partners and their directors, officers, employees, agents, representatives and intermediaries and all other third parties who may act as a representative, intermediary or agent of Shaw Contracting.

## Reporting non-compliance

Shaw is committed to ensuring you can raise concerns about conduct that may be contrary to the Code of Conduct, whether it be unethical or illegal, without fear of victimisation or discrimination. If you become aware of a breach or suspected breach, please report it immediately to your manager or Manager People & Systems.

## Penalties for breach

Shaw takes breaches of this Code seriously. Consequences range from disciplinary action through to termination of employment or contract. We reserve the right to inform the appropriate authorities where it is considered that there has been criminal activity or an apparent breach of law.

## Review of this Code of Conduct

The Code is reviewed regularly and may be modified or supplemented from time to time. You will be notified of any major revisions to the Code.



## Compliance with the law

### CONDUCT PRINCIPLE 1

**Key Processes:** Document Control Procedure; Legal Obligations Register  
**Core Values:** Safety; Teamwork; Integrity; Responsibility

### Our commitment

We are committed to operating our business in full compliance with all applicable laws and regulations. Everyone must understand and follow the legal framework that governs their work.

### Your responsibility

You must:

- ✔ Ensure all operational documented processes are controlled
- ✔ Comply with all laws and regulations relevant to your role
- ✔ Understand Shaw's policies and procedures relevant to your area of work
- ✔ Contact your manager if you are concerned about a particular law, regulation, policy, standard or procedure



## Professional behaviour

### CONDUCT PRINCIPLE 2

**Key Processes:** Diversity, Equity and Inclusion (DEI) Policy; People & Culture Policy  
**Core Values:** Teamwork; Integrity

#### Our commitment

Shaw is firmly against all forms of intimidation, discrimination and harassment. We are committed to diversity and equal opportunity, and every member of our team is expected to uphold these principles in every interaction.

#### Your responsibility

You must:

- ✔ Maintain professional conduct at all times when interacting with colleagues and when representing Shaw
- ✔ Act with integrity, fairness and in compliance with applicable laws
- ✔ Be mindful of the social ramifications of your actions and behave accordingly



## Health, safety and environment

### CONDUCT PRINCIPLE 3

**Key Processes:** Health, Safety, Environment and Quality (HSEQ) Policy; HSE Framework; Risk Management Framework

**Core Value:** Safety

#### Our commitment

We are committed to providing a safe and healthy work environment for all employees, contractors and visitors. Safety is a core value at Shaw. Harm minimisation comes before operational and financial considerations in every decision we make.

#### Your responsibility

You must:

- ✔ Take reasonable care for your own health, wellbeing and safety, and that of others
- ✔ Comply with reasonable instructions given by management in line with Shaw's HSEQ Policy
- ✔ Comply with all associated procedures and applicable health and safety legislation
- ✔ Immediately stop and report any unsafe or potentially unsafe conditions to your manager
- ✔ Exercise your duty of care at all times



## How we work together

### CONDUCT PRINCIPLE 4

**Key Policy:** People & Culture Policy

**Core Value:** Teamwork

### Our commitment

The “**How We Work Together – Towards the Same Goal**” principles underpin our culture of collaboration, accountability and respect. These behaviours are embedded in our core systems and processes to enable growth, innovation and shared success.

### Your responsibility

You must:

- ✓ Build a culture of respect that enables people to succeed
- ✓ Focus on partnerships and collaboration, not hierarchy
- ✓ Deliver superior results through effective planning and agile deployment
- ✓ **Lead by example** – Do what you say you will do, be responsible and take action
- ✓ Act with integrity and engage openly with stakeholders



## Workplace behaviour

### CONDUCT PRINCIPLE 5

**Key Policies:** DEI Policy; People & Culture Policy

**Core Value:** Integrity; Responsibility

### Our commitment

Shaw is committed to building a workplace where every person feels valued, respected and included, and free from all forms of discrimination, harassment, bullying, victimisation, vilification and violence. Every person at Shaw has the right to be treated with dignity and respect, and the responsibility to treat others the same way.

### Your responsibility

You must:

- ✔ Treat everyone equally and without discrimination based on race, age, gender, gender identity, sexual orientation, disability, pregnancy, religion, cultural background or any other protected attribute
- ✔ Never engage in discrimination, harassment (including sexual and gender-based harassment), bullying, victimisation, vilification or violence
- ✔ Never create or contribute to a hostile work environment
- ✔ Report any witnessed or suspected breach of appropriate workplace behaviour to your manager or Manager People & Systems immediately
- ✔ Cooperate fully with any investigation into a workplace behaviour matter
- ✔ Understand that breaches of this principle may also constitute breaches of applicable law, exposing individuals and Shaw to legal consequences



# Zero tolerance for violence

## CONDUCT PRINCIPLE 6

**Key Processes:** People & Culture Policy, HSEQ Policy; HSE Framework

**Core Values:** Safety; Responsibility

### Our commitment

Shaw has a zero tolerance approach to violence in any form. Violence is fundamentally inconsistent with our values and will not be tolerated under any circumstances. We are committed to providing a workplace where employees, contractors, visitors and representatives can perform their work free from threats, aggression, intimidation or harm. Violence creates unacceptable risks to health and safety, damages working relationships, and undermines trust and confidence within our organisation.

### Your responsibility

You must:

- ✔ Conduct yourself in a manner that promotes safety and respect at all times
- ✔ Never engage in or threaten violent behaviour, including joking about violence or making threats, even if not intended seriously
- ✔ Report any act or threat of violence to your manager or Manager People & Systems immediately



## Conflicts of interest

### CONDUCT PRINCIPLE 7

**Key Processes:** Risk Management Framework; Shaw's System Processes

**Core Value:** Integrity

### Our commitment

We expect all Shaw people to act in the best interests of the company to minimise conflicts of interest. Conflicts of interest whether actual, potential or perceived can undermine trust and must be disclosed promptly.

### Your responsibility

You must:

- ✔ Avoid situations where personal or financial interests could conflict with your obligations to Shaw
- ✔ Immediately disclose any actual or potential conflict of interest to your manager
- ✔ Do not use company information, assets or relationships for personal gain
- ✔ Remove yourself from hiring, procurement, managing or performance reviews involving the person of interest
- ✔ Implement closer monitoring of duties or involve an independent third party to oversee tasks of the person of interest



## Business integrity, anti-bribery and political dialogue

### CONDUCT PRINCIPLE 8

**Key Processes:** Modern Slavery Policy; Environmental, Social and Governance Policy; Shaw's System Processes

**Core Values:** Integrity; Responsibility

#### Our commitment

Shaw conducts business with integrity and transparency. We strictly prohibit any form of bribery, corruption, kickbacks or facilitation payments and the perception of corrupt conduct can seriously damage our reputation and business. We also maintain constructive, transparent and professional relationships with government, regulators and public authorities to support informed public policy and sustainable business outcomes.

All government engagement is conducted with independence, legal compliance and the highest ethical standards. We do not make cash or in-kind contributions to political parties, and any financial contributions associated with legitimate democratic processes are appropriately managed and disclosed in accordance with applicable laws.

#### Your responsibility

You must:

- ✔ Use only legitimate and ethical business practices in all dealings with clients, government and other stakeholders
- ✔ Never offer, give, request or accept any improper advantage, gift or payment intended to influence a business or government decision
- ✔ Accurately record all transactions
- ✔ Ensure any engagement with government bodies or public officials is transparent, lawful and approved by your manager
- ✔ Never make cash or in-kind contributions to political parties or use Shaw resources for political fundraising purposes
- ✔ Immediately report any suspicious or improper business practices to your manager or Manager People & Systems



## Use of company assets

### CONDUCT PRINCIPLE 9

**Key Processes:** Environmental, Social and Governance Policy; Data Protection Policy; Fatigue Management; Staff Travel Framework

**Core Values:** Safety; Responsibility; Integrity

### Our commitment

Shaw's assets including equipment, vehicles, technology, systems and intellectual property must be used responsibly and only for legitimate business purposes. Every Shaw person shares responsibility for protecting these resources.

### Your responsibility

You must:

- ✔ Use company assets only for authorised, legitimate business purposes
- ✔ Use a company vehicle in line with Shaw's Vehicle Policy and terms of employment
- ✔ Do not damage, misuse or misappropriate Shaw assets or technology
- ✔ Always protect Shaw's confidential information and intellectual property



# Maintaining complete, accurate and timely Shaw records

## CONDUCT PRINCIPLE 10

**Key Policy:** Data Protection Policy

**Core Value:** Responsibility

### Our commitment

Shaw is committed to maintaining complete, accurate and timely business records across all our operations. Accurate records protect the integrity of our business, support sound decision making and ensure we meet our legal and contractual obligations.

### Your responsibility

You must:

- ✔ Ensure all records, reports and information accurately reflect the underlying transactions and events
- ✔ Never misstate, falsify or modify records to mislead others, or assist others in doing so
- ✔ Retain business records in accordance with applicable laws and Shaw's document retention requirements
- ✔ Promptly report any significant operational, financial or safety developments to your manager
- ✔ Cooperate fully with requests from internal and external auditors or investigators



# Community and Aboriginal engagement

## CONDUCT PRINCIPLE 11

**Key Policies:** DEI Policy; People & Culture Policy; Leave and Absence Procedure  
**Core Values:** Responsibility; Integrity

### Our commitment

Shaw is committed to building genuine, respectful and lasting relationships with the communities where we work, particularly with Aboriginal and Torres Strait Islander peoples. We recognise the importance of Aboriginal participation not just as a social obligation but as a core part of how we deliver our work. Engaging Aboriginal people in the functional delivery of Shaw’s business strengthens our projects, our communities and our reputation.

### Your responsibility

You must:

- ✔ Actively support and promote Aboriginal participation in Shaw’s workforce, supply chain and project delivery
- ✔ Respect Aboriginal and Torres Strait Islander cultural heritage, customs and community needs in all our operations
- ✔ Engage with local communities openly, respectfully and in a way that creates genuine opportunity
- ✔ Report any activity that may affect cultural heritage or community relationships to your manager immediately
- ✔ Participate in Shaw’s Aboriginal engagement initiatives and embed these commitments in how you plan and deliver work



## Privacy and confidential information

### CONDUCT PRINCIPLE 12

**Key Policy:** Data Protection Policy

**Core Value:** Integrity

### Our commitment

We recognise the importance of privacy and the protection of confidential information. Shaw is committed to proactively managing data security threats and protecting the personal information of employees, customers and partners.

### Your responsibility

You must:

- ✔ Protect personal and confidential information against misuse or unauthorised disclosure
- ✔ Collect and use personal information only for its intended, lawful business purpose
- ✔ Maintain confidentiality obligations even after leaving Shaw
- ✔ Report any suspected data breach or information security incident to your manager

# Contacts

The Whistleblower Protection Policy sets out a number of ways we support you with *'speaking up'*. Under the Policy, we confirm our commitment to supporting a safe workplace and confidential environment for *'speaking up'* or making disclosures about any known, suspected, unlawful or inappropriate conduct without fear of retribution or detrimental treatment.

If you believe a breach of this Code of Conduct has occurred, or if you have any concerns about conduct at Shaw, you have both the right and the responsibility to speak up. Reports made in good faith will be treated with confidentiality and investigated appropriately. You can report concerns to any of the following:

## **First Point of Contact: Your direct manager**

Raise day to day concerns, questions and issues here first. Your manager is best placed to understand your role and resolve most matters promptly.

## **Next Contact: Your functional department manager**

If unresolved or inappropriate where the matter involves your direct manager or a conflict of interest.

## **People & Culture: Manager People & Systems**

For people matters such as HR related concerns, behavioural issues or matters involving privacy.

## **Independent Reporting: Refer to Whistleblower Policy**

Reports are managed by our independent third party and investigated appropriately.



Your manager is responsible for making you aware of this Code of Conduct and all other Shaw policies and procedures.

**However, it is ultimately your responsibility to ensure you understand and comply with them.**



**Shaw**



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