

Our Code



Your guide to living
Our Values every day.



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Acknowledgement of Country

Inland Rail acknowledges and pays respects to the Traditional Custodians of the lands and waterways on which, or near where, our company is located and operates. We pay our respects to Elders past, present and emerging.

Journey artwork created by Elenore Binge, proud Gomeroi/Kamilaroi woman.



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Glossary

A Glossary of Terms can be found by accessing the Inland Rail Intranet Page ([click to access](#)).

Specific terms and acronyms used throughout this guideline are listed and described in the table below.

Table 1: Terminology

TERM	ACRONYM	DEFINITION
2Up Leader		Manager or supervisor who is two reporting lines up.
Governments		Means federal, state or local councils.
Human Rights		The basic rights and freedoms that belong to every person in accordance with the <i>Human Rights Commission Act 1986</i> (Cth).
Modern Slavery		Means any activity, practice or conduct prohibited or defined as modern slavery offence under the <i>Modern Slavery Act 2018</i> (Cth). It can take different forms, but involves an individual being exploited by others for their personal or commercial gain, with the individual suffering a loss of personal freedom.
Policy or procedure		In accordance with the Inland Rail Management System.
Regulatory official		Includes any officer or employee of a regulatory organisation or any department or agency thereof; any person acting in an official function or capacity for a regulatory organisation; or any person who holds themselves to be the authorised intermediary of a regulator organisation.



CEO message



“We use Our Values and Our Code to drive the best possible outcomes.”

We're transforming Australia's freight future, together.

And how we do that, matters.

All of our decisions and actions are guided by Our Values which include Collaboration, Accountability, Respect and Excellence.

Our Code of Conduct brings these values to life. It reminds us why Our Values are important and helps us understand them in practice.

Our Code is not just for employees and contractors. Operating with integrity is everyone's responsibility. It applies to you if you work for us, with us, or on our behalf.

We use Our Values and Our Code to ensure we deliver best possible outcomes.

They guide our partnerships with the communities in which we operate through to how we work with our stakeholders. And we never compromise on them.

Our Code guides how we create a workplace where everyone, including those we work with, feel respected and safe to speak up if they see something that might contradict Our Code, we won't tolerate retribution against anyone who raises a concern.

Inland Rail is a place where people feel safe and free to contribute their best. It's incumbent on every one of us to become active participants, have difficult conversations, reflect on our own biases and always call out poor behaviours. It's vital that we all come together and own Our Code of Conduct collectively.

I see the commitment from our people every day, and while we will always strive to be better, this makes me so proud to lead Inland Rail.

Nick Miller
Chief Executive Officer



Our Code of Conduct



Our Code matters

At Inland Rail, our vision is to transform Australia's freight future by delivering an efficient and reliable rail freight connection for all Australians, making a difference to regions, businesses and communities now and into the future.

Everywhere we work, we commit to doing what is right and keeping our promises. We care as much about how we achieve results as the results themselves. That's why Our Code of Conduct matters. It helps us deliver on our Vision and make the right decisions every day.

It provides clear guidance on how to put Our Values into practice. You'll understand how it applies to you and what is acceptable – and what's not – when working with colleagues, suppliers, clients, governments and communities. And while it can't describe or anticipate every situation, if you see – or suspect – a breach of Our Code, you'll know how to raise your concern or seek further information and guidance.

Our Code applies to you

Operating with integrity is everyone's responsibility. If you work for us, with us or on our behalf (including but not limited to contractors, sub-contractors and consultants), Our Code applies to you.

We expect you to:

- read and understand Our Code
- complete mandatory training on Our Code when asked to do so, including any role-specific training assigned to you
- comply with Our Code, policies, statements, standards, commitments and all applicable laws in Australia
- understand Our Code always applies to you: on-site, in offices, when working remotely, in accommodation, at functions, when travelling and whenever representing Inland Rail
- speak up and report any concerns or breaches of Our Code
- contribute to a culture that aligns with Our Code.

If you are in a leadership role, we also expect you to:

- lead by example and model behaviours that align with Our Code and Our Values
- ensure every team member understands their responsibilities to always comply with Our Code and Our Values
- foster an inclusive culture where everyone feels safe to bring their whole selves to work and are comfortable to speak up or ask questions without fear of retribution
- respond to concerns promptly, appropriately and maintain confidentiality
- take meaningful action if you see conduct that doesn't meet our expected standards.

Don't look the other way, speak up

If you think a decision or action is not in line with Our Code and Our Values, please speak up:

Values	Is this in line with Our Values?
Legal	Is this legal?
Competency and Authority	Do I have the professional competency and authority to make this decision?
Impact	Have I considered the impact on others in my decision making?
Safety	Could this directly or indirectly endanger someone or cause them physical or mental harm?
Media	If this appeared as a story in the media, would I feel comfortable?
Sharing	Would I feel comfortable if this was seen, overheard or shared with a colleague, leader, friend, family member or stranger?
Conscience	Does this fit with my personal values?
Feel	Does this feel right?

If you answer **no** to any of the above, stop and speak with your leader.



We welcome your feedback and ideas for improving Our Code. Visit inlandrailhr@inlandrail.com.au.

What happens when you speak up

We treat every report of a potential breach of Our Code sensitively, respectfully and confidentially. When a report is raised, it may be subject to investigation under our corporate policies, such as our Whistleblowing Policy or other policies. The way we investigate an allegation will depend on who raises the concern, the seriousness and nature of the alleged conduct, and how the allegation was received. This would include:

- **Initial assessment and fact finding**

We'll review all reports to understand the allegations, before allocating the best placed team to conduct any investigation where required. If your concerns were not made anonymously, you may be invited to a meeting to discuss the concerns.

- **Conducting an investigation**

If required, an investigation will be initiated to review any reported breaches of Our Code. This will be managed by the most appropriate team according to the report and in accordance with any relevant procedures. External resources may be utilised where appropriate.

- **Findings and conclusions**

The findings of the investigation or other enquiries will be reviewed and necessary measures put in place. You may be advised of the outcome where this is feasible, appropriate and permitted by law. It should be noted that individuals who choose to remain anonymous will not ordinarily be able to receive feedback.

If you have any concerns during the process, speak to your line leader, 2Up leader, HR Business Partner or General Counsel.

Protecting those who speak up

Ensuring you can speak up without threats, intimidation, harassment, exclusion or humiliation is critical. We do not tolerate or allow any form of punishment, discipline or retaliatory action to be taken against anyone for speaking up, intending to speak up or being suspected of speaking up or for cooperating with an investigation. In some circumstances, you may also have legal protection when you speak up. Refer to the Whistleblowing Policy for more information.

Anyone involved in retaliatory behaviour is breaching Our Code and will be subject to disciplinary action. In certain circumstances, retaliation may also breach whistleblower laws and the Whistleblowing Policy. If you believe you or anyone else may be or have been, retaliated against for speaking up, report to your line leader, 2Up leader, HR Business Partner or General Counsel.

Any information you provide will be kept in confidence, consistent with law and good business practices. If you've disclosed your identity when making a report, this will only be disclosed if we're compelled to by law, if you've consented or if we determine it's appropriate to refer the matter to emergency services, law enforcement or a regulator. If you've chosen to make an anonymous report, we will respect your decision.

Nothing in Our Code or any other document or procedure prevents you from or requires approval for, reporting to an appropriate government authority or law enforcement body or from seeking legal advice in relation to your rights.

Speak up

When raising a concern or reporting a breach of Our Code, be open, accurate and provide as much information as you can.

- If you're an employee or contractor, talk to your line leader, 2Up leader, HR Business Partner or General Counsel. You can also raise your concern via the Whistleblower Hotline.
- If you're a community member, former employee, an employee's relative or spouse, supplier or vendor, you can speak with your Inland Rail contact point or contact the Whistleblower Hotline.

How to speak up

If you have questions about Our Code, speak to your line leader, 2Up leader, HR Business Partner, General Counsel or contact the Whistleblower Hotline. Anyone who works with us, on our behalf or is associated with us, can also access the Whistleblower Hotline:

☎ 1800 205 989

🌐 kpmgfaircall.kpmg.com.au/InlandRail

✉ FairCall@KPMG.com.au

Secure mail:

✉ **The FairCall Manager**
KPMG Forensic
PO Box H67
Australia Square
Sydney NSW 1213

If you contact the Whistleblower Hotline, it will always be taken in total confidence. When you contact the Whistleblower Hotline, you may choose to remain anonymous. If you do, you will not be asked for personal details. Unless you choose to provide the Whistleblower Hotline with your personal details, Inland Rail will not attempt to obtain your identity.

What happens if you breach Our Code?

Anyone found breaching Our Code can face serious consequences. Depending on the severity of the breach, this could include:

- counselling with a line leader or 2Up leader
- a written warning
- a final written warning
- termination of employment.

In some cases, a breach of Our Code may also break the law, leading to civil penalties or criminal charges.





Our Vision, Purpose and Values

Vision & Purpose

The Vision defines the desired future state of our Program, what we hope to achieve. Our Purpose defines why we exist and how we benefit others.

Vision

Together, we're transforming Australia's freight future

Purpose

To deliver an efficient and reliable rail freight connection

Our CARE Values

The things we value enable us to have a shared understanding of what we stand for, who we are and how we operate.

Collaboration

Teamwork is at the heart of what we do

Accountability

Doing things right, means doing things safely

Respect

We behave honestly and with integrity

Excellence

We bring our passion, creativity and drive to solve complex challenges every day



Collaboration



Teamwork is at the heart of what we do



Accountability



Doing things right,
means doing things safely



Respect



We behave honestly
and with integrity



Excellence



We bring our passion, creativity and drive
to solve complex challenges every day

1



Look out for one another

Our priority is to provide a healthy, safe, inclusive workplace where everyone is treated with respect.



A healthy and safe workplace

Ensuring a healthy and safe workplace is our priority and everyone's responsibility

What this means for you

We want everyone to feel physically and psychologically safe. You contribute to this by following our policies, guidelines, procedures, plans and Code. It's everyone's responsibility to prevent and report hazards, workplace-related injuries, illnesses, near misses and incidents. You can report safety issues through the WHS Committee or anonymously via the Whistleblower Hotline.

You must hold mandatory competencies relevant to your work activities and complete assigned training. Being fit for work means being medically fit, free of alcohol and drugs, sufficiently rested and alert to perform your role safely. You are required to comply with applicable alcohol limitations at site camps and during other work-related activities or travel. We may ask you to undergo drug and alcohol testing and you must comply with these requests.

If you are a line leader

- implement these requirements and ensure supporting systems and processes are in place and monitored
- provide an environment where everyone feels safe to report any threats to their health, safety, security or wellbeing
- support your team in complying with inductions, training or competency assessments

If you're concerned about a colleague, talk to a leader or contact the Employee Assistance Program.

Always

- immediately stop any work that appears unsafe
- comply with relevant health and safety requirements, use all personal protective equipment provided and help others to do the same
- report all health, safety and environmental hazards and events according to procedures
- identify, assess and take steps to eliminate or control health and safety hazards
- inform your line leader or 2Up leader if you have concerns about your fitness for work or a colleague's ability to work safely
- comply with alcohol consumption limits at site camps, when travelling for work, representing Inland Rail or participating in Inland Rail events (including Company Christmas functions)
- complete all required inductions, training or competency assessments promptly
- act on all complaints or warnings raised with you.

Never

- undertake work unless you are trained, competent, medically fit, free of alcohol and drugs and sufficiently rested and alert
- undertake any work that appears unsafe, including if the required personal protective equipment is not available
- take prescribed or non-prescribed drugs without understanding and declaring their impact on your ability to work safely
- have illegal drugs in your possession at work
- consume illicit drugs, be intoxicated or exceed the local alcohol limit at Inland Rail accommodation or events or when representing Inland Rail.



Scenario

Q. I've recently been diagnosed with a medical condition and my doctor has prescribed medication to help me with it. Do I need to declare the medication?

A. We want you to go home safe and well every day and it is important you never undertake work unless you are medically fit to do so. Inform your line leader if you have any concerns about yours or a colleague's fitness for work or ability to carry out assigned work safely. Specific requirements for declaring medications are outlined in the Health and Fitness Policy and Procedure. For more information refer to the Safety and Wellness landing page or contact your line leader and/or the HSE team.



Respect for all

We are committed to a safe, respectful and inclusive workplace, free from harassment, bullying and discrimination. Everyone deserves respect at work, and it is an expectation that all workers uphold Our Values.

How we define the term workplace

Harassment, bullying, discrimination and other unacceptable conduct are prohibited in all workplaces, including:

- any office or site location
- working in a hybrid arrangement (such as from home)
- working from a different location (such as a regional office or in the rail corridor)
- social functions (both inside and outside of normal working hours)
- in vehicles
- in other accommodation
- online or via technology (emails, text messages, etc.) and social media.

What this means for you

You need to understand and demonstrate the standards of behaviour. The behaviours on page 22 and 23 are breaches of Our Code and will not be tolerated.

Power imbalances in the workplace

Power imbalances may exist in the workplace and have the potential to be misused. This is unacceptable and can undermine efforts to create a safe and respectful workplace for everyone. As leaders responsible for providing mentoring, training or are in a position of trust, it is expected they will not pursue romantic or intimate relationships with anyone in trainee, apprentice, graduate or intern positions.

Workplace violence

Workplace violence can be any incident where a person is abused, threatened or assaulted in circumstances arising out of, or in the course of their work. The violence can be either directed at the person or as a result of witnessing violence against someone else.

The definition of workplace violence covers a broad range of actions and behaviours that create a risk to the health and safety of all workers. Examples include, but are not limited to: punching, pushing, throwing objects, verbal threats or threatening somebody with a weapon.

Take action

If you see, hear or experience behaviour that is not in line with Our Code or Our Values, speak up immediately. Be supportive and provide encouragement to colleagues who speak up.

Leaders must report business conduct concerns to their leader, 2Up Leader, HR Business Partner or General Counsel. Some types of workplace bullying are criminal offences and should be reported to the Police if experienced.

Inland Rail employees have access to free, external, confidential counselling and support services delivered by Converge International and known as our Employee Assistance Program (EAP). Your sessions are strictly confidential.

Other external support options include:

- 1800RESPECT (1800 737 732)
- Lifeline 13 11 14
- Centres Against Sexual Assault (casa.org.au)
- Mensline (part of DVConnect) 1800 600 636



Always

- act professionally and treat everyone with respect
- speak up if you see, hear or experience disrespectful behaviour directed towards you or anyone else
- challenge inappropriate, exclusionary or discriminatory behaviour, whether it's intentional or not
- make any employment-related decisions, including recruitment, promotion, training, development and remuneration, based on merit according to skills, qualifications and capabilities.

Never

- engage in harassment (e.g. offensive jokes, suggestions or derogatory comments about an individual's racial or ethnic background, sex, sexual preference, disability, physical appearance or age), sexual harassment, bullying, racism (including racial harassment) or discrimination
- deliberately exclude someone from workplace activities, withhold information that is vital for effective work performance or deny access to information, supervision, consultation or resources to the detriment of a colleague
- behave in a way that would be reasonably viewed as offensive, insulting, intimidating, malicious or humiliating, including making comments about someone's personal characteristics
- distribute, display or share any material that could reasonably offend including: pornography, racist, homophobic, transphobic, sexist or culturally inappropriate photos, videos, cartoons and social media content; and any personal information that does not relate to you found online
- take part in or facilitate hospitality or entertainment of an inappropriate nature (for example, sexually oriented) or at inappropriate venues, including accepting or facilitating gifts which are inappropriate
- make unwelcome requests for a romantic or intimate relationship with a colleague
- take advantage of or pursue a romantic or intimate relationship with a trainee, apprentice, graduate or intern if you are a people leader or responsible for providing mentoring or training. This is extended to hazing or other initiation rituals
- treat someone differently for taking or not taking part in industrial activities such as belonging or not belonging to an industrial and/or union association
- discriminate against any individual or group based on personal attributes unrelated to job performance.

Scenarios

Q. One of my colleagues has asked me out on a date on a couple of occasions. I've said I'm not interested and now their behaviour is making me feel uncomfortable. They are saying sexually inappropriate things and making fun of me in front of other people in meetings. My colleagues laugh about it and when I told another colleague, they said I was over-reacting and being too sensitive. What should I do?

A. This is sexual harassment and will not be tolerated. If you are comfortable, speak directly to your colleague about their behaviour. Otherwise talk to your line leader, 2Up leader immediately or contact your HR Business Partner or Legal. You can also talk to a friend you trust for support and/or EAP.

Q. In a performance conversation, my leader brought up a deadline I had missed. I hadn't mentioned it because I was embarrassed about it so when they raised it, I felt uncomfortable. They also raised a minor breach of safety rules that someone had already discussed with me. Isn't this bullying behaviour?

A. Performance conversations which are reasonable management action carried out in a reasonable manner will not be considered bullying. Leaders are empowered to lift the performance of their teams, including by setting performance standards and holding employees to those standards through coaching that is respectful and constructive. If safety rules (or provisions of Our Code) are breached, leaders are entitled to provide firm, clear and reasonable feedback. In the context of a performance conversation, it might cross the line and become bullying if a leader provides feedback by shouting, swearing and using belittling language. This is unacceptable.

Q. A leader repeatedly excludes me from meetings that are critical for me to attend based on my role accountabilities. I feel uncomfortable about this and wonder what I have done wrong to be treated like this?

A. This is bullying. The employee is likely to feel disempowered and humiliated. It may set the employee up to fail as they haven't had the opportunity to be involved in meetings to participate and receive vital information. It is unwelcome and unsolicited and because it has happened repeatedly, it is likely to constitute bullying.

Behaviours that have no place at Inland Rail



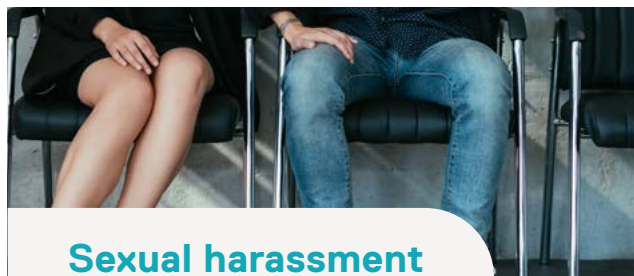
Harassment

An action or behaviour that would be reasonably viewed as humiliating, intimidating or offensive.

A single, one-off incident of unreasonable behaviour that would be reasonably viewed as humiliating, intimidating or offensive is not workplace bullying, but it could constitute harassment. Single incidents of harassment should not be ignored. This behaviour is in breach of Our Code and there is a risk the behaviour might be repeated or escalate.

The law states that whether an action or behaviour is harassment is based on 'the eye of the beholder.' That is, it is not how the comment or action was intended that is important, it is how it is received and the impact to the individual.

Reasonable management action does not constitute harassment.



Sexual harassment and sexual assault

Sexual harassment is an unwelcome sexual advance, unwelcome request for sexual favours or other unwelcome conduct of a sexual nature, which makes a person feel offended, humiliated and/or intimidated, where a reasonable person would anticipate that reaction in the circumstances.

Sexual harassment encompasses a range of conduct including displaying sexually graphic images, sexually suggestive comments, suggestive or inappropriate looks, gestures or staring, non-consensual touching or acts of a sexual nature and sexual assault.

Sexual harassment is not always obvious, repeated or continuous. While bullying is characterised by repeated behaviour, sexual harassment can be a one-off incident.



Bullying

Repeated behaviour directed towards a worker (or group of workers) that a reasonable person, having considered the circumstances, may see as unreasonable, including withholding information, or exclusion to the detriment of the worker, victimising, humiliating, intimidating or threatening behaviour.

Repeated humiliating or threatening behaviour can constitute bullying.

Consistent with Our Code and Our Values, our leaders are empowered to lift the performance of their teams through regular coaching and feedback that is respectful and constructive. Such coaching and feedback are not harassment or bullying.

The possible impact of the action or behaviour on the recipient considering all the circumstances (not just the intent of the person using the behaviour) is considered when determining whether the action or behaviour is bullying, harassment of any kind or discrimination.

Behaviours that have no place at Inland Rail



Racism and racial harassment

Racial harassment is a racial slur, derogatory comment or unwanted conduct based on race, descent, ancestry, ethnicity, ethnic origin, nationality, national origin, country of origin, colour or status as an immigrant.

Racism, including racial harassment, can appear in a variety of ways. Racist conduct includes racial harassment and other forms of prejudice, discrimination or hatred directed at a person based on race, descent, ancestry, ethnicity, ethnic origin, nationality, national origin, country of origin, colour or status as an immigrant.

Racial harassment can be a one-off comment. It is important to remember that a racially harassing comment affects not only the target of the comment but also colleagues and onlookers. Even if a person genuinely thinks a recipient will understand that a racist

comment was not meant to be insulting or hurtful, that comment may still have an effect on others that is not acceptable and will not be tolerated.

Racial harassment and racism more generally are not only overt acts of abuse or harassment but will include all forms of conduct – conscious or unconscious, explicit or implicit – that prevent others from participating in workplace life because of their race. Sometimes this can be caused by policies and practices rather than the actions of one individual – this is often referred to as structural, systemic or institutional racism. Inland Rail is committed to continually seeking to understand where structural, systemic or institutional racism might exist in our business and to taking action to address it. If you suspect this is occurring, please speak up.



Discrimination

Adverse treatment of an individual or group based on personal attributes unrelated to job performance, such as race, gender identity, sex, age, origin, ethnicity, sexual orientation, intersex status, gender reassignment, transgender status, disability, marital and civil partnership status, religion, political opinion, pregnancy, breastfeeding or family responsibilities.

We will not tolerate any form of unlawful discrimination. Unlawful discrimination against a person based on personal attributes unrelated to job performance, is prohibited.

The possible impact of the action or behaviour on the recipient considering all the circumstances (not just the intent of the person using the behaviour) is considered when determining whether the action or behaviour is bullying, harassment of any kind or discrimination.

2



Care for people and our environment

We are committed to creating lasting social value for people and the environment. We all play a role in respecting human rights, supporting our communities and demonstrating environmental responsibility.

Respecting human rights and preventing modern slavery

Upholding and advancing human rights are critical to the sustainable operation of our business and supply chain.

Human rights are basic political, civil, economic, labour, social and cultural rights and freedoms to which all people are entitled, without discrimination. Respecting human rights and contributing to the realisation of rights is critical to the sustainable operation of our business and is the right thing to do. We also respect the role of human rights defenders in upholding civic freedoms and their significant voice in understanding and addressing human rights challenges.

Modern slavery is a term used to describe serious exploitation and describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom.

Practices that constitute modern slavery can include human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage and/or the worst forms of child labour.

Procurement and supply chains are commonly where the greatest modern slavery risks arise, due to the large volume and range of inputs into goods and service agreements. Whether a direct supplier or an indirect supplier, the point of origin of materials and components, and workforce conditions along the supply chain is invariably opaque. This is particularly relevant in countries with relatively little local manufacturing and thus long and often not transparent international supply chains.

While procurement and international supply chains are the main modern slavery risk areas for Inland Rail, the potential risk of modern slavery within the domestic workforce also exists, due to both the large indirect workforce and the temporary nature of construction work.

What this means for you

You must consider the human rights and social and community impacts of our programs.

Always comply with applicable laws, existing Modern Slavery Statements and protocols, and identify, mitigate or eliminate any risks for modern slavery that may arise from our operations, including those from suppliers and contractors.

Uphold the commitments as set out in the applicable Environmental Impact Statement. This includes working to obtain free, prior and informed consent for our projects, located on lands traditionally owned by or under customary use of, First Nations peoples and likely to have significant adverse impacts on First Nations peoples.

Consider the connection between environmental sustainability and human rights.

Always

- raise any human rights concerns with your line leader or the appropriate Contract Manager or Whistleblower Hotline
- consider the human rights implications of Inland Rail activities, including across our contractors and supply chain
- identify and address modern slavery risks, human rights concerns and adverse impacts from the perspective of the person who holds the right.

Never

- threaten, punish, discipline or retaliate against anyone, inside or outside Inland Rail, for raising or helping to address a human rights concern.



Scenarios

Q. Supply chain:

I have seen recent media reports that a large electrical equipment manufacturer whose products are used by Inland Rail has been under scrutiny due to some of its sub-component manufacturers being accused of forced labour in the production of its products. I don't know if the equipment supplied to Inland Rail includes these sub-components. What should I do?

A. Respecting human rights is one of the foundational principles for contributing meaningful social value to society and we expect the businesses we work with to also meet this commitment. Any concerns of modern slavery within our operations or supply chain must immediately be raised with your line leader or 2UP leader or via the Whistleblower Hotline. This will allow Inland Rail to investigate the matter and if necessary, conduct further due diligence. We can then take appropriate action, including requesting further information from the supplier and, where appropriate, initiate a supplier development plan to close the gaps in the supplier's modern slavery practices.

Q. Workforce:

While sitting in a mess on an Inland Rail project site, I heard a group of foreign workers quietly discussing their concerns that they were being coercively controlled by their employer, involving longer hours and less pay than contracted for, delays in payroll and implied threats surrounding non-renewal of work visas. What should I do?

A. Refer to the answer to the scenario above as the response would be consistent.

Support our communities

We are committed to building long-term partnerships based on respect, transparency and mutual values.

We seek to understand the interests, concerns and aspirations of the communities where we operate and recognise our everyday interactions, activities, behaviours and decisions can impact positively and negatively on our long-term viability and the social and economic wellbeing of those communities.

What this means for you

All communication with external stakeholders must be honest, respectful and transparent. Engage with people affected by our operations and consider their views, including those of vulnerable and disadvantaged groups, in business decisions. Complete necessary cultural awareness training when engaging with Indigenous or First Nations stakeholders and respect their rights.

If people raise concerns or complaints during your engagements with community stakeholders, record these in line with the relevant Complaints Management process. Acknowledging the complaint is the first step, resolving it will be done in line with our complaints management processes.

Direct community investments through the Inland Rail Community Grants and ensure local businesses have a fair opportunity to benefit from project work.

If you work on our behalf, show the same level of respect and familiarise yourself with our engagement requirements with host communities.

Always

- respect the cultures and customs of the communities we operate in, as long as they don't conflict with Our Code or the law
- engage with respect, honesty and transparency
- take the views and expectations of stakeholders into account in decision-making
- investigate concerns and report outcomes to relevant stakeholders
- direct sponsorship and donation requests to the Inland Rail Community Grants guideline
- speak to your line leader, 2Up leader, HR Business Partner or General Counsel for advice on community projects, sponsorship or donation or conflicts of interest
- engage regularly with suppliers and partners to share Our Code and implement robust contract management processes to ensure there are respectful behaviours and performance in the communities in which we do business.

Never

- intentionally favour individuals from one political, religious or ethnic group on the basis of their membership of that group. The exception is when such action supports an Inland Rail approved or legally required program of positive discrimination (for example, to assist historically disadvantaged groups in the community)
- contribute to religious organisations for religious purposes on behalf of Inland Rail.



Scenarios

Q. I have been approached by a First Nations business looking to win work with Inland Rail. I know we are about to commence negotiations related to cultural heritage and land access in the near future. Is it okay to award this work to the business?

A. Providing economic empowerment opportunities to First Nations and traditional owner businesses is a priority for Inland Rail and is an important way to ensure our operations provide mutual benefit to communities within which we operate. Because we are commencing discussions of cultural heritage and land access you should speak with Procurement to assess any actual or perceived connection between the upcoming cultural heritage negotiations and the scope of work related to the contract we are looking to award. This may also involve consultation with the Cultural Heritage team and Probity to discuss what actions to take. If the contracting opportunity does proceed it may be necessary to put measures in place that ensure any perceived conflict or undue benefit to the group is managed appropriately.

Q. I'm aware the local First Nations community has strong connections to the land on which we operate, but I'm not sure if there is any active engagement to ensure their significant sites are effectively identified and managed. I raised this with my team and they didn't know if any engagement is happening either. What should I do?

A. Engaging with the traditional owners of the land and managing cultural heritage matters is an integral part of our business. We have a framework for identifying, documenting and managing aspects of cultural significance. Inland Rail works to obtain the consent of First Nations communities for projects that are located on lands traditionally owned by or under customary use of, First Nations Indigenous peoples and are likely to have significant adverse impacts on First Nations peoples. If you are unsure whether these requirements are being met or have any concerns, speak with your line leader or 2Up leader or use the Whistleblower Hotline.

Be environmentally responsible

Our environmental performance and management of impacts is an important part of our contribution to social value.

We take a nature-positive approach to managing, conserving and restoring land, water and biodiversity. Our environmental responsibility is to understand and avoid or minimise environmental impacts and contribute to the resilience of and positive impact to, the natural environment at every stage of our operations.

We have environmental and sustainability targets, including biodiversity goals and are members of the Infrastructure Sustainability Council. This Council administers the Infrastructure Sustainability (IS) rating scheme, through which Inland Rail has registered. Achieving IS certification for each project provides assurance of our genuine sustainability claims and our commitment to delivering sustainable rail infrastructure.

We identify, assess and control risks, working in partnership with others to contribute to a resilient environment.

What this means for you

You must understand the potential environmental risks, threats and opportunities, of the tasks you perform in your work. You must also understand environmental regulatory requirements relating to the tasks you perform and look at ways to avoid, minimise and rehabilitate impacts to air, water, land, cultural values and biodiversity. Where actual or potential environmental events occur, including non-compliances with environmental regulatory requirements, you must report these in Horizon360, regardless of severity.

Everyone working with us is encouraged to contribute toward improving our environmental performance and complying with our environmental requirements. Speak to your primary Inland Rail contact for more information about our environmental requirements or any suggestions you have on how we can improve environmental stewardship.

Always

- immediately stop any work that may cause or contribute to a significant environmental or community event such as an accident, incident, spill or release of material
- report actual or potential environmental impacts to your line leader or 2Up leader
- identify, understand and comply with our environmental and regulatory requirements that relate to your work, including any land disturbance, water, air, biodiversity, dust, noise and waste management requirements
- identify, assess and take steps to avoid and minimise adverse environmental impacts associated with your work and take opportunities to improve environmental performance
- encourage those who work with us to minimise their environmental impacts and take opportunities to improve performance.

Never

- operate in a location or way that is not in accordance with local regulatory requirements or site environmental procedures
- undertake work that has the potential to impact on the environment unless you are trained and competent to do so and controls are in place to minimise environmental impacts
- engage contractors or suppliers without an assessment that takes into account their environmental and community impacts, risks, controls and performance.



Scenario

- Q.** I noticed fuel containers have been left beside the light vehicle parking area on site and there is some staining on the ground around them. This doesn't look right. What should I do?
- A.** Contact the site environmental representative to ensure that the spill is cleaned up and investigated and the fuel containers are placed in a bunded area. We are always looking to minimise adverse environmental impacts and maximise opportunities for positive environmental outcomes from our activities so raise your suggestions with your line leader or 2Up leader or the onsite environmental representatives.

3



Work with integrity

We care as much about how results are achieved as we do about the results themselves.

Foster open, constructive government relationships

Our ability to conduct business is directly affected by government decision-making. We regularly share information and opinions with governments on issues that affect our operations and our industry.

What this means for you

Always act with integrity and maintain honest, transparent relationships with governments and their agencies, officials and staff.

If engaging with governments on non-routine matters, consult your Corporate Affairs representative before proceeding.

Obtain approval from Corporate Affairs before making any submissions or responding to government inquiries on behalf of Inland Rail.

Before you participate in events organised by political parties or officials, ensure it is for business purposes, related to policy briefings and supported by your line leader and Corporate Affairs.

Notify your line leader or 2Up leader if you wish to participate as an individual in the political process, including running for political office. Record in the Conflict of Interest register.

Always

- be truthful, accurate and cooperative with government officials, complying with all laws and regulations
- speak to Corporate Affairs before you engage with government officials or their representatives on public policy or issues that could impact Inland Rail's reputation or licence to operate
- get approval from Corporate Affairs before engaging with government or regulators on inquiries, investigations or issuing notifications
- seek approval for involvement in any business-related event or activity organised by or on behalf of, a political party or candidate and be transparent when undertaking such activities
- discuss with your line leader and 2Up leader and advise in writing if you plan to seek or accept a role in public office.

Never

- authorise, offer, give or promise anything of value directly or indirectly to a government official to influence official action
- attend an event or activity during work hours or on behalf of Inland Rail which is intended for political fundraising
- attempt to obstruct the lawful collection of information, data, testimony or records by appropriately authorised government or regulatory officials or hinder the lawful and proper provision of such information by another employee
- take retaliatory action against anyone who lawfully and properly cooperates with government agencies
- use or allow others to use, any Inland Rail information, assets or resources (including donations or sponsorships) for a political campaign, party or candidate, elected official or any of their affiliated organisations
- pay wages or salaries, fringe benefits remuneration of any kind to an Inland Rail employee working for a political party or candidate during normal working hours.



Scenarios

Q. I have been invited by a political party to attend an event to discuss policy related to the freight sector in an open and transparent forum hosted by elected officials. The value of the ticket provided is \$520. Can I attend and if so, do I need approval?

A. You should always seek approvals under the Conflicts of Interest and Gifts Policy prior to accepting an invitation of this nature. This ensures adequate consideration is given as to whether the ticket costs are or can be perceived as political fundraising. You should also consult with Corporate Affairs to ensure there is no conflict of interest that you or your line leader, may not be aware of.

Q. I am considering running for an elected position on my local city council. The position is only part-time and is unpaid and I don't see it conflicting with my duties at Inland Rail. What should I do to determine if I can maintain my employment at Inland Rail while I hold a role as an elected official in public office? If I later need to resign from the public office position, can I get my former position back at Inland Rail?

A. Holding a public office role at the same time as being an Inland Rail employee can lead to conflicts between your duties as an Inland Rail employee and your duties as a public official. Discuss your intentions with your line leader and 2Up leader before running for public office and seek approval via the Conflict of Interest and Gifts Policy and Outside Employment Policy.

In some circumstances, it might be possible for you to hold an unpaid, part-time role as an elected official if there is no potential for overlap between the role and Inland Rail's business and it will not impact your ability to safely perform your Inland Rail role (including having regard to fatigue management considerations). However, if holding any public office role (part-time or full-time) would create an actual, potential or perceived conflict of interest that can't be managed to Inland Rail's satisfaction then you may have to resign from your Inland Rail role before commencing the public office role. If you later leave the public office role and want to apply to rejoin Inland Rail, you may be able to do so, but your former Inland Rail position might no longer be open.

Remember, these scenarios may attract media attention. Unless requested by Inland Rail you must not speak with the media about any matters pertaining to Inland Rail. For any concerned member of the public, direct them to the Enviroline for any questions or concerns.



Treat our business partners and agents with respect, transparency and fairness

Our relationships with our partners – contractors, designers, consultants, landholders and general stakeholders – are key to our success.

What this means for you

We strive to build and maintain strong relationships of mutual respect and trust with our partners. To do so, we treat everyone fairly, honestly and with respect, and expect those with whom we do business to do the same.

We engage partners to deliver a range of services that are critical to the success of the Inland Rail Program. Inland Rail's ability to compete for scarce talent and specialist resources is based on our reputation as a high integrity and trusted partner.

We uphold the highest standards of transparency, impartiality and accountability in all our business dealings, while ensuring that we continue to build positive relationships and communicate openly with our enabling partners.

Always

- be clear on our role and accountabilities as a client organisation and the role of our partners
- build and maintain effective working relationships
- establish honest, fair and easily understood business and contractual arrangements based on mutual understanding of obligations
- act in a transparent and accountable manner
- manage our commercial affairs with responsiveness, care and due diligence
- be cooperative and collaborative
- foster the exchange of ideas and sharing of knowledge, whilst protecting appropriately our intellectual property
- respect confidentiality, sensitivities and the intellectual property of others
- deliver on our commitments
- recognise the importance of resolving differences and disputes in a fair, equitable and timely manner.

Never

- assume risk by over-reaching and 'directing' our partners without approval/full consideration of the legal/commercial consequences
- misrepresent what we can deliver
- engage in any unfair, deceptive or misleading practices
- offer or provide anything in exchange for an advantage for the Company.



Scenario

Q. A co-worker provided inaccurate information to a landholder. I am hesitant to contact them because I do not want them to think we are dishonest. What should I do?

A. It would be a violation of Our Code to deliberately leave out important information. You and your co-worker should reach out to the landholder, with the support of the Stakeholder Engagement team, to immediately correct any mistakes. While the landholder may be unhappy that they received incorrect information initially, your honesty will be appreciated in the end by the landholder and the Company.



Conduct business in an ethical and honest manner

We have zero tolerance for bribery or corruption of any kind, which can be both outbound and inbound.

Everyone working with or for us must comply with anti-corruption laws and no-one has the authority to waive these requirements. Where anti-corruption laws are not respected, criminal and civil penalties (including a term of imprisonment) can apply. Report any concerns about bribery or corruption immediately to your line leader, 2Up leader, General Counsel or via the Whistleblower Hotline.

What this means for you

You must not authorise, give or promise anything of value, directly or indirectly (for example, through a third party), to anyone to influence them in their role or encourage them to perform their work disloyally or improperly.

Similarly, you must not request or accept anything of value, directly or indirectly, to improperly influence you in your work for Inland Rail. You should never make payments of any amount to government officials to facilitate routine services that are legally available.

The commitment to managing and controlling fraud is represented in the Fraud Control Plan. It supports the commitment to fraud control by establishing the detailed action items necessary to prevent, detect and respond to fraud. The Conflict of Interest and Gifts Policy sets out details of when you must obtain pre-approval to offer or provide something of value to an external person. In all cases, items must:

- only be offered or provided for a legitimate business purpose
- not be offered or provided to improperly influence or reward action
- comply with local laws
- be of appropriate value and nature considering local customs and law, the position of the recipient and the circumstances
- regardless of value, not be offered or provided with a frequency which could reasonably be seen as being intended to improperly influence any person
- not be capable of causing reputational damage to Inland Rail.

You must also obtain pre-approval for engaging a supplier who will interact with others on our behalf, offering to undertake a community donation or project or offering to sponsor an event.

The Conflict of Interest and Gifts Policy also describes what gifts can be accepted and any disclosure obligations.

Always

- report corruption concerns immediately
- understand the identity, role and interests of the person or business who you are dealing with (including the beneficial ownership of companies)
- gain pre-approval before offering anything of value, according to thresholds in the Conflict of Interest and Gifts Policy or for commercial sponsorships and communication donations or projects
- record all transactions accurately and in reasonable detail to reflect their true nature
- declare any potential or perceived conflicts of interest or gifts received in line with the Conflict of Interest and Gifts Policy.

Never

- offer, promise, give or approve anything of value of any kind to a government official (including a political party, elected official or candidate for public office or a person who holds or performs the duties of an appointment, office or position created by tradition, custom or convention) to influence official action
- award business to companies owned by a government official, their relatives or associates in exchange for a benefit to you or Inland Rail
- engage in corrupt conduct or deal with parties refusing to disclose true identities
- offer, promise, give or approve schemes or arrangements which give an improper benefit to anyone
- establish a hidden or incorrectly recorded fund for prohibited payments.
- use personal funds, divide payments into smaller amounts to avoid approval thresholds or hide activity which would otherwise need pre-approval
- use a supplier if you are concerned they will engage in corrupt or improper conduct on our behalf
- deal with a party that refuses to disclose its true identity (including details of company beneficial ownership).



Scenarios

Q. I speak regularly with a government official who is responsible for making decisions that will affect Inland Rail. Their son has recently graduated with first class honours from university at a location where we have an office and wants to find a job so he can stay locally. The official has enquired if Inland Rail has any jobs and whether I can do anything to help his son.

A. A job is something of value and the son is a close relative of an influential government official. Given the official is currently making decisions which will affect Inland Rail, this could be used or misinterpreted as a form of bribery and could constitute a breach of anti-corruption laws. The official's son can apply for advertised jobs and his application will be assessed on its merits in the same manner as any other job application. For further guidance, contact our Legal team.

Q. A vendor I regularly work with offers to send me to a three-day course at their educational centre on topics relevant to my role. I'd like to attend because I think it will benefit Inland Rail, help me stay on top of trends in the industry and increase my ability to perform my role. The vendor is hosting the course regardless of whether I attend and my attendance will not be an additional cost to the vendor. Can I accept the offer?

A. If attending the course will in any way compromise (or might reasonably be seen by someone else as compromising) your ability to perform your duties or might prevent you from working with the vendor without bias in the future, you should not accept the offer. If Inland Rail is currently in a tender with the vendor offering the course or you manage the contract or have input into whether the contract be extended, you should also not accept the offer. Otherwise, estimate the value of the course and complete the Conflict and Gift Notification Form, seeking your line leader's approval to attend. If you are approved to attend, book and pay for any travel expenses following Inland Rail business travel expense guidelines.

Transparent supplier relationships

We value our relationships with suppliers and aim to have an effective and transparent supply chain.

Suppliers who act illegally or unethically can significantly impact our reputation and potentially expose Inland Rail and our employees to criminal and civil penalties. We only seek to work with suppliers who are willing to adhere to similar values as our own.

We use fair and equitable processes to clearly inform potential suppliers of our expectations and standards and the requirements applicable to them. We encourage our suppliers to be transparent on matters important to society, including on their beneficial ownership.

What this means for you

If you need to source goods or services for Inland Rail, choose suppliers carefully and encourage them to uphold our standards and contribute positively to our reputation.

Only work with suppliers committed to:

- lawful business practices
- high standards of business conduct
- management practices that respect the rights of all employees and local communities
- minimising environmental impacts
- providing a safe and healthy workplace
- respecting human rights, including consideration of modern slavery.

If you have doubts about the supplier or potential supplier's integrity or capability, address them immediately. Inform suppliers where they can access Our Code to understand our expectations.

Always

- source goods or services in accordance with the Procurement Policy to ensure purchases show value for money
- speak up about supplier activities inconsistent with Our Code
- ensure suppliers are reputable, competent and qualified to perform the work, will operate safely and ethically and compensation sought is reasonable
- ensure a valid purchase order or contract has been executed before they start work or provide goods or services
- manage suppliers in accordance with the Commercial management policies and procedures
- conduct regular reviews of supplier relationships
- verify payment claims or invoices clearly represent goods and services provided
- make payments only to contractual counterparties that provide the actual goods or services
- recognise the importance of resolving differences and disputes in a fair, equitable and timely manner and with consideration to value for money so as to provide certainty to all parties.

Never

- use suppliers who breach or do not meet our Supplier Safety and Prequalification Requirements (Avetta)
- ignore warning signs of inappropriate supplier behaviour
- award or influence the award of business to a supplier you have a direct or indirect financial interest in or who is in anyway associated with a close relative or whom you have a personal relationship
- suggest or directly request a personal gift, hospitality or anything of value from a supplier
- sign a supplier's contract or any supplier documentation unless you are authorised under the Inland Rail Delegation of Authority
- share one supplier's confidential information with another
- approve a purchase requisition that does not meet Inland Rail requirements or expectations
- allow supplier representatives to approve their own invoices
- enter into fraudulent or illegal transactions or fail to report them as soon as you suspect these arrangements exist
- award business to a supplier who would present a corruption risk or who refuses to disclose their beneficial ownership as required
- award business to suppliers refusing to disclose beneficial ownership.



Scenario

Q. I'm engaging consulting services from a reputable supplier but I'm aware they outsource repetitive and administrative tasks to offices in developing nations. We have asked for details about their working conditions in order to ensure we are complying with any applicable labour rights legislation. The supplier has refused to provide these details. Can I still continue the engagement?

A. It is important for all our suppliers to comply with our Procurement policies. If the supplier refuses to comply, we cannot do business with them unless an exemption has been granted for valid reasons. Consult with the Procurement team to review the facts and align on a course of action.

Conflicts of interest, gifts and hospitality

Every decision we make should be in the best interests of Inland Rail and free from personal bias.

Conflicts of interest, whether actual, potential or perceived, must be disclosed and managed. These can occur when personal interests affect or are perceived to affect, your duties.

These include, but are not limited to:

- pursuing, awarding or maintaining Inland Rail business opportunities for personal gain or for the benefit of friends and family
- holding other jobs or affiliations or directorships without first declaring these arrangements
- having close personal relationships with individuals in positions of influence that Inland Rail does business with
- using Inland Rail information to solicit further related business
- holding investments in businesses that are suppliers to Inland Rail or which Inland Rail has or may invest in
- offering or receiving money, property, services or gifts, hospitality or entertainment to or from suppliers or other third parties doing or proposing to do, business with Inland Rail
- not disclosing close personal relationships, especially if they are in your reporting line, including a close relative or a romantic or intimate relationship.

What this means for you

Most people want to do the right thing and sometimes it can be difficult to know if a Conflict of Interest (COI) really exists. While having a COI is not necessarily wrong, it's better to avoid being placed in conflicting situations where practical. If in doubt, declare business and personal dealings that may create a conflict of interest or a potential or perceived conflict so it can be managed appropriately.

Conflicts of interest can also arise during normal business and also due to changes in your personal circumstances. It is important to review your declared conflicts of interest regularly to make sure they are still being appropriately managed.

Report all actual, potential or perceived conflicts of interest based on the process outlined in the Conflict of Interest and Gifts Policy and submit a Conflict of Interest Declaration.

If you have a conflict of interest:

- submit a Conflict of Interest Declaration as soon as possible, as per the Conflict of Interest and Gifts Policy
- agree, document and implement an appropriate course of action to manage the conflict
- monitor and regularly validate adherence to the agreed probity and segregation plan
- adjust the probity and segregation plan of action as required.

Conflicts of Interest in themselves do not usually constitute corrupt conduct. However, corrupt conduct can arise when a COI is concealed, understated or mismanaged. Most forms of corrupt conduct involve a COI.

You must refuse and declare all offers of gifts, benefits and hospitality that include:

- offers by external parties that are currently tendering or expected to tender for work with Inland Rail
- travel and accommodation from external parties
- offers of hospitality not of a valid business purpose such as attending sporting events
- gifts or hospitality greater than \$100 in value without a legitimate business benefit
- offers provided more than once by the same supplier, even if less than \$100 in value
- money, items used in a similar way to money, or items easily converted to money
- outcomes that risk adversely affect the standing of Inland Rail or bring Inland Rail into disrepute
- items that would otherwise give rise to an actual, potential or perceived conflict of interest.

If you have received an offer of a gift, benefit or hospitality, follow the steps outlined in the Conflict of Interest and Gifts Policy or consult with your line leader or General Counsel, who will be able to advise on how best to manage any requirements for declaring the offer received.



Always

- excuse yourself from decisions where you have an interest that could influence your ability to make an objective decision
- report all actual, potential or perceived conflicts of interest by submitting a Conflict of Interest Declaration as soon as possible
- ensure that contracting partners and consultants working in substantive positions at Inland Rail do not make decisions outside delegations or result in a potential conflict of interest.

Never

- hire, promote or directly supervise a close relative or use businesses of close relatives unless this has been specifically authorised via the Conflict of Interest Declaration
- appoint or award business to any party that you are personally or financially associated with
- misuse Inland Rail resources (including information) or your position of influence at Inland Rail to promote or assist an external activity or party
- interfere in the fair and transparent operation of bid or tender processes
- accept gifts, hospitality, entertainment or favours from those evaluated in bids or tenders.



Scenarios

Q. My partner's consultancy specialises in an area where Inland Rail needs advice. Can I recommend their business?

A. You can make the team aware of your partner's connection to the business, however, you should be completely transparent about your interest so procurement processes can be independently applied. Discuss the recommendation with your line leader, ensure the details are registered by submitting a Conflict of Interest Declaration and that a suitable plan is in place and has been approved to manage this potential conflict of interest.

Q. My regular contact from an important supplier has invited me to a music concert where their company has booked a hospitality room. Should I accept their offer to attend the concert?

A. Regardless of the ticket value, this represents hospitality that is unrelated to a valid business purpose and you should decline it. You should declare the gift offered by submitting a Gifts, Benefits and Hospitality Declaration as per the Conflict of Interest and Gifts Policy at the earliest possible opportunity. Your line leader will also be able to advise on how best to manage and decline the offer received.

Q. I have a contractor working in my team who is also a Director of her own consulting business. We need to engage an additional resource within the team and she has a resource working for the consultancy that would be a good fit for what we need. What should I do?

A. This situation represents a potential or perceived conflict of interest. You should engage with a member of the Procurement team and ensure that the potential conflict is declared, ensuring that the individual plays no role in the process. The procurement team will advise on a market competitive and transparent process.

Communicate consistently and truthfully

Engaging with our external stakeholders in a consistent way helps build, protect and enhance our reputation and licence to operate and ensures we meet our regulatory requirements.

Only authorised spokespeople can make public disclosures, that is any public communication that can be attributed to Inland Rail, such as:

- regulatory filings, such as annual reports and briefings on business performance
- media releases, interviews, speeches, presentations, articles and reports
- information relating to on-site construction/operations activities delivered by Inland Rail or our contractors
- digital information available on websites, social media and messaging channels.

What this means for you

Engage with our stakeholders as we seek to apply a fair and ethical approach to business conduct and to leverage stakeholder engagement for improved strategic outcomes.

Always act in accordance with Our Values and Our Code. Understand the difference between company information that can be shared informally (like published and in the public domain) and material information which can only be communicated by authorised Inland Rail spokespeople. If you think you possess or have released material information that has not been disclosed report it immediately to a member of the Corporate Affairs Team.

Ensure all external materials such as speeches, articles and presentations, are approved by Corporate Affairs. Know and follow our Social Media Procedure. Social media activity may feel casual and spontaneous; however, it is permanently retained and can be traced back to Inland Rail. Always use digital channels according to Our Values and Our Code or seek advice from the Digital Communication team.

Always

- follow rules relating to who can make public statements on behalf of Inland Rail
- get relevant approvals before publicly releasing material
- comply with Corporate Affairs requirements in relation to attending external events, presenting speeches and participating in panel discussions
- ensure anything you share on social media channels is approved to share and aligns with Our Values and Our Code
- immediately report any information or major developments that could have a material effect on shareholder disclosures to Corporate Affairs.

Never

- disclose information to the public or divulge confidential information about any Inland Rail or Inland Rail contractor activities unless you are specifically authorised to do so
- share confidential information about Inland Rail or contractors
- conceal facts or omit information that may be relevant to a disclosure
- use Inland Rail branding unless you are specifically authorised to do so
- post content or comments in private messaging groups or public social media channels that are obscene, defamatory, threatening, harassing, discriminatory or hateful to any person, group or entity.



Scenarios

Q. I saw a comment on Facebook about something taking place related to my work that I know is not accurate. Can I correct the statement?

A. If you choose to contribute to the discussion, you should only mention information that has already been publicly shared. It's okay to talk about your workplace but take care not to reveal confidential information when you do. If you're not sure, speak with your line leader first.

Q. I took a great photo of my teammates onsite with visuals in the background. They are in full PPE. Can I put this on Facebook?

A. You should check with your line leader on the rules before taking any photos. You should also confirm with your team mates whether they are okay for their photo to be taken and for it to be posted on social media.

Fair competition

We are committed to full compliance with competition laws.

Competition laws promote fair competition and prevent practices that restrain trade or restrict free and fair competition, like price-fixing, market sharing, bid-rigging or abusing a dominant position. Breaching these laws can result in serious consequences for both you and Inland Rail, including fines and imprisonment.

What this means for you

To ensure you do not breach or appear to breach competition laws, contact Procurement or Legal:

- before exchanging competitively sensitive information, directly or indirectly, with a competitor or potential competitor
- before joining an organisation involving competitors or potential competitors
- when potentially inappropriate contact is initiated by a competitor or potential competitors
- when considering new cooperation arrangements with a competitor or potential competitor, including joint production, joint procurement, joint marketing and shared logistics
- when a complaint is made about the competitive behaviour of Inland Rail
- when you suspect a third party is acting in an anti-competitive manner towards Inland Rail
- if you are contacted by a competition authority.

Always

- maintain Inland Rail's independence in dealings with third parties, including in relation to pricing and marketing
- consider the appearance and implication of interacting with competition or potential competition
- avoid any action which could imply illegal coordination with competition or potential competition
- ensure written communications are clear and accurate
- obtain approval from Corporate Affairs before submitting information to competition authorities
- comply with joint venture ring-fencing protocols
- consult Procurement or Legal before accusing a third party of anti-competitive behaviour.

Never

- agree with competitors to fix, raise, lower or stabilise, including in relation to recruitment activities such as employee salaries and benefits
- agree other competitive terms with a competitor such as pricing formulae, discounts, margins, rebates, commissions or credit terms
- rig bids or coordinate bidding activities illegally
- agree with competitors to boycott any customer or supplier
- obstruct a competition authority by providing false or misleading information, preventing a legitimate onsite investigation, concealing or destroying documents or alerting any third party to the fact of a competition law investigation.



Scenario

- Q.** At a social gathering, another organisation complains to me about one of our vendors. He says his company will never use the vendor again and recommends we do the same. We have had a similar negative experience, so can we agree with the organisation's recommendation?
- A.** The other organisation's recommendation raises a potential collective boycott issue and you should not agree with it. In engaging with other organisations, avoid expressly or implicitly agreeing not to deal with a particular supplier, regardless of whether you are having the discussion in a business, social or other context. In this scenario, the risk can be avoided by stating that Inland Rail independently evaluates and takes decisions regarding its vendors. Alternatively, indicate that you do not wish to discuss the topic. If the organisation persists, you should walk away and report the incident to your line leader or Legal.

4



Protect our company

If you work for us or on our behalf, you have an obligation to protect Inland Rail property and respect intellectual property rights.



Protect our assets

We all have an obligation to protect Inland Rail's assets and use them for their intended purpose. These include physical and non-physical property such as equipment, inventory, technology, money, intellectual property (IP) and company information and data.

What this means for you

You are responsible for appropriately using and safeguarding Inland Rail's assets. You're also expected to respect the physical and non-physical assets of others and never knowingly damage or misappropriate these assets, including information and technology.

You are expected to capture or create data that meets our data quality standards. If you're not sure of the standards, refer to the Inland Rail guideline.

Never share confidential information without authorisation from your line leader. If unsure, ask your line leader, 2-Up leader or the Legal Team.

We are all responsible for protecting Inland Rail's assets and this includes preventing and detecting fraud. Fraud is any deliberate act of deception for personal or third-party gain, which may result in financial or non-financial loss to Inland Rail or another party. Examples may include, but are not limited to, making false statements or falsifying documents to obtain a personal commission or award, misusing Inland Rail's information for personal advantage or physical theft.

Always

- use our assets for their intended purpose
- protect our assets from waste, damage, misuse, interference, unauthorised access, modification or disclosure loss, fraud and theft report any misuse, fraud or theft
- report any potential waste, damage, misuse, loss, fraud or theft of our assets
- prevent unauthorised access to facilities and information, data or other assets, wherever possible
- report suspicious emails or calls to Cybersecurity
- apply data retention and disposal schedules outlined in our procedures before disposing of data
- follow the Information Management Framework when creating, capturing or managing information.

Never

- use Inland Rail's assets for personal gain
- take physical property or information assets for personal use
- transfer data outside Inland Rail systems without approval from ICT or the information owner
- enter into any fraudulent or illegal transactions or fail to report any fraudulent activity
- take any action that undermines data integrity
- permit unauthorised entry to Inland Rail sites or offices or access to technology
- ignore security complaints or follow inadequate security procedures that may present threats to our people or assets.



Scenarios

Q. My team has recently changed to a new application. No one uses the old system. Can I delete the data in the old system?

A. Historical data is an asset. The data retention and disposal schedule in the Inland Rail Retention and Disposal Procedure should be consulted before deleting the data. If unsure, please discuss with the Information Management Team.

Q. I work as an Administrative Assistant and sometimes my line leader asks me to perform work for his personal business during work time. I don't want to question my line leader or 2Up leader or get anyone into trouble, but I also don't want to do anything wrong. What should I do?

A. You should not be asked to work on personal business matters or use Inland Rail property, including Technology systems for these purposes. Inland Rail's assets, information systems and communication resources should only be used for Inland Rail business purposes. You should talk to the Legal team.



Safeguard our technology, systems and data

Safeguarding our technology, systems and data is everyone's responsibility.

Inappropriate use of technology or data can expose us to risks including viruses, ransomware attacks, security breaches and theft or loss of Inland Rail property and more. This could result in financial loss, legal impact or reputational damage.

All Inland Rail hardware, software and data, including those on personal devices, is the property of Inland Rail. To mitigate risks and comply with relevant laws, regulations and standards, the use of Inland Rail technology and systems may be accessed, reviewed or disclosed for maintenance, business needs or to meet legal, regulatory or policy requirements.

What this means for you

To protect against damage, loss, theft, misuse, interference and unauthorised alteration, access and disclosure, you must safeguard and use our technology and data securely and appropriately.

Never use our technology or data to commit cybercrime, duplicate or sell software or media files, share your account password, use data for non-Inland Rail business purposes or cause reputational damage to Inland Rail. Our technology must never be used as a platform to create or spread false information.

Never use our technology and data inappropriately or inappropriate materials are accessed or stored using our systems. Inappropriate material includes pornographic or sexually explicit or exploitative images or text, materials promoting violence, hatred, racism, religious beliefs, terrorism or the intolerance of others or any other material deemed obscene or abusive.

Never use, modify, transfer, publish, share, remove or delete Inland Rail data or intellectual property without written authorisation from your line leader.

Limited personal use of Inland Rail technology is permitted, provided you comply with the above requirements and it does not interfere with business operations, impact the user's work performance, cause additional costs or hinder the work of others.

Always

- follow our Social Media Procedure when using Inland Rail's technology, systems and data.
- treat emails and other electronic forms of communication as official records
- use authorised applications for business communications or to conduct business activities
- ensure your personal and corporate devices have the latest security updates – do this by connecting Inland Rail devices to our corporate network at least once a month
- return all Inland Rail equipment and information assets upon termination of your employment or contract
- report the damage, loss or theft of Inland Rail equipment, or unauthorised access to, or use or disclosure of Inland Rail data to your line leader and ICT as quickly as possible
- protect any hardware, software and data for which you are responsible from damage, loss, theft, interference and unauthorised access, modification, disclosure or use
- report suspicious emails to ICT as phishing
- lock your screen when you are away from your workstation.

Never

- share Inland Rail system, devices or application passwords or allow unauthorised access using your login credentials
- leave devices unattended in public places
- engage in fraud, commit a crime online or fail to report it
- procure or install software or connect hardware without authorisation from ICT
- deliberately access, store, send, post or publish inappropriate material or ignore these activities if you know of others doing so
- use unauthorised applications (such as WhatsApp, WeChat) for documenting or agreeing business transactions. See our Social Media Procedure for details
- store, send, post or publish Inland Rail data or proprietary information outside of our systems or devices including social media without prior authorisation from ICT
- use non-Inland Rail storage solutions (external hard drives, USBs, personal email, personal cloud storage or internet storage services) to store Inland Rail data
- copy or transfer files that violate copyright laws
- disable security measures on Inland Rail technology systems
- receive compensation for the disposal of Inland Rail equipment.



Scenarios

Q. Upon signing up to various social media and career networking websites, I am often asked to provide an email contact. It's more convenient for me to use my Inland Rail email address. Should I submit this address?

A. Your Inland Rail email address should never be used for personal purposes. Despite the convenience, this email address should only be used for work related tasks. As we have no control over other websites, there may be an unacceptable likelihood of your email address being stolen or leaked, risking your privacy and home life and Inland Rail's brand, technology, systems and data.

Q. I have a task to complete and at my last job we used some freeware software to complete the task. Given it is free can I just install and use the software?

A. No. All software installed must be evaluated and approved for use in the Inland Rail ICT environment prior to installing. Even freeware needs to be evaluated and approved. Freeware may be not be free to use in a commercial environment. Contact ICT for assistance.

Protect our intellectual property

Intellectual Property (IP) rights protect and enable our technology, processes, documents, products and brands.

IP can include inventions, trademarks, designs and copyrighted works like text, images, drawings, software and confidential information and data (such as algorithms and know-how). Inland Rail owns and licenses IP from third parties, including ARTC. New IP is created daily in our operations through copyright in documents, software code, innovations or work with suppliers.

Like other Inland Rail property, IP rights has financial and strategic value. We can prevent others from copying our IP or obtain licenses to use others' IP to gain a competitive edge. The value of our IP can be lost by improper disclosure or use, inappropriate contractual terms or failing to follow necessary formalities for protection, such as registration.

Infringing on others' IP can lead to costly legal disputes, hindering our operations and damaging our reputation.

What this means for you

You should always safeguard Inland Rail's IP, respect the IP rights of others (including ARTC and contractors) and take steps to manage infringement risks. Never disclose Inland Rail's confidential information without approval, even after leaving Inland Rail. If there is a legitimate reason to share information, get approval from your line leader and have a confidentiality agreement in place.

To protect our IP and data, use Inland Rail's standard contracts with suppliers. Follow approval processes for any changes. Keep new IP created through innovations or improvements confidential. If unsure about protection, seek advice from Legal. Only use third-party IP if you have written permission or legal advice. Always check for third-party IP rights infringements when developing or deploying new technology or before copying or sharing.

Always

- enter confidentiality agreements before starting negotiation or any other engagement with a person outside of Inland Rail who may receive or access Inland Rail's confidential IP or information
- be aware of what information is confidential and comply with Inland Rail's Information Management Framework (for example, classifying and marking documents). Only give confidential information to people who need to know it
- ensure onboarding processes confirm ongoing confidentiality obligations and that departing personnel have not retained any confidential materials
- use Inland Rail's standard contracts, wherever possible, when contracting with third parties and only depart from Inland Rail's standard IP and confidentiality terms after obtaining appropriate internal approvals
- keep any new IP created, such as innovations or improvements to our processes, confidential and check with Legal if any additional protection is required
- ensure no third party IP rights may be infringed before you copy, share, develop or deploy new technology or processes. If unsure, seek guidance
- use a third party's IP only as permitted in writing by that party (for example in a contract with a supplier) or otherwise as permitted by law where you have advice from Legal
- understand your contracted obligations around IP retention and handback before joining suppliers, government organisations, competitors or potential competitors.

Never

- disclose Inland Rail's IP without first obtaining permission from your line leader and, if the IP is confidential, making sure the recipient has a legal obligation to keep the information confidential (for example under a confidentiality agreement)
- bring to Inland Rail or use any confidential information, including documents or computer records, from prior employers or clients without their written permission
- share, copy or deploy a new technology or process without first ensuring you are not infringing a third party's IP
- use third parties' copyright materials (for example software, photographs, text, audio or video downloaded from the internet) or trademarks in materials you are producing including for use on the Inland Rail intranet site, without first obtaining permission from the copyright or trademark owner
- copy Inland Rail's IP to an unapproved storage location or system including external sharing sites or personal drives.



Scenarios

Q. I am planning to work from home over the weekend on an important document but don't want to carry my laptop home. Can I send the document to my personal email and then work on it from home on my personal computer?

A. Inland Rail data or intellectual property should always be protected by storing or sharing or publishing using Inland Rail approved locations and applications, including when working from home. Do not transfer, publish, share, remove or delete Inland Rail data or intellectual property from those approved locations without authorisation from your line leader or the Head of ICT.

Q. When I leave Inland Rail can I take any of my work with me?

A. As a general rule, any work you create that relates to our business is owned by Inland Rail and cannot be used outside of the company. There may be limited circumstances where Inland Rail will permit you to use that work product, but only with prior written permission and after any Inland Rail information has been removed. Discuss the matter with your line leader or 2Up leader prior to leaving Inland Rail.

Respect personal information and privacy

We respect personal information and privacy and expect you to respect the personal information and privacy of others.

Personal information includes any information or opinion about identifiable individuals, such as current, former or prospective employees, contractors and business contacts. This can include names, addresses, job applications, employment information, performance records, health and safety information, location data and opinions or correspondence to and from a person.

For more information on how we collect and process personal information and your rights in relation to personal information, please refer to our Privacy Management Plan.

What this means for you

Follow our standards and procedures on handling personal information and protect privacy. Only collect, use, disclose, retain or process personal information that is necessary to meet business requirements as permitted by law in places where we operate. Always treat the personal information and privacy of others with respect.

Always

- have a legal, legitimate and specific Inland Rail business purpose for collecting, sharing, using or handling personal information and do not use it for any other purpose. If you're unsure, seek advice from Legal
- collect the minimum amount of personal information legitimately necessary for the specific business purpose
- maintain the accuracy of your personal information and any other personal information that you handle and process
- retain personal information for the minimum amount of time necessary and securely dispose of it when it is no longer required
- notify individuals why their personal information is required and how it will be used and allow them to exercise their legal rights in relation to their personal information
- adequately safeguard personal information against unauthorised or unlawful handling, access, use, modification, sharing, loss, interference, destruction or damage
- check and comply with the legal requirements for handling personal information, as applicable from time to time
- follow the Personal Information Plan when creating, capturing or managing information including records, non-records, personal information and controlled documents.

Never

- access, use or share personal information without specific authorisation from your line leader or a clear business requirement
- retain personal information longer than legally required or necessary for the purpose it was collected (or any other purpose permitted by law)
- collect or process sensitive personal information unless explicit consent has been obtained from the individual or it is permitted by applicable laws and regulations
- store files without adequate protection and access restrictions if they contain sensitive personal information, such as health data or payroll information
- share your login details.



Scenarios

Q. I suspect the payroll details of an employee may have been mistakenly shared with an incorrect recipient. Should I wait until they confirm they have received the data to report the potential breach?

A. No, you must immediately report all suspected and confirmed data breaches to your line leader and follow the Data Breach Policy.

Q. I've recently changed my address and phone number but haven't informed anyone at Inland Rail. Is this a problem?

A. We are required by law to keep your personal information accurate and up to date to ensure that you or your next of kin can be contacted in an emergency. It is your responsibility to inform us of any changes to your personal information as soon as possible. You do this online via People Platform or by providing the information to your line leader or 2Up leader.

Q. I have been requested to create a report that involves payroll details of individuals. What are the requirements I need to be aware of while storing and sharing this report?

A. You must ensure:

- Only the minimum amount of data necessary for the report is collected and used
- The report is stored securely and proper access rights are administered to prevent unauthorised personnel from accessing the report

Q. I found some personal information stored in a system that I have no reason to access and don't think I should be able to access. Should I just close it and pretend I didn't see it?

A. No, you must immediately close the record and not make any copies. You should also immediately report the discovery to your line leader or 2up leader. You should not discuss any of the information found with any other party.

Report truthfully

Reporting truthfully ensures we maintain the trust of our stakeholders.

When creating and maintaining data, it must be accurate, complete and appropriate. There is never a justification for falsifying records, misrepresenting facts or engaging in any other fraudulent behaviour. All financial and non-financial reports must be evidenced by appropriate source documents, verified for accuracy and completeness, properly authorised and accurately recorded in the relevant accounts, systems and records.

What this means for you

If you are responsible for reporting financial or non-financial information, follow processes and establish internal controls to ensure reports are truthful, accurate, complete, timely and understandable. Understand and comply with all financial, regulatory and reporting requirements, laws and regulations. If you have concerns about the validity of any reporting process or record keeping activity or believe you are being asked to create false or misleading information, report this immediately to your 2Up leader, General Counsel or the Whistleblower Hotline.

Always

- Make and keep books, records and accounts which, in reasonable detail, accurately and fairly reflect Inland Rail's transactions in accordance with all applicable laws, regulations, standards and procedures
- Speak up immediately if you suspect fraudulent activity and report any actual or suspected irregularities or weaknesses in internal controls, accounting or reporting
- Cooperate with our internal and external auditors and disclose all pertinent information that could reasonably impact the data verification process and results of an audit
- Ensure no undisclosed or unrecorded account, fund or asset is established or maintained
- Ensure work-related expenses are in accordance with our expense policy, legitimate, reasonable and supported by valid receipts and invoices
- Return or transfer the custody of all relevant business records if you change roles within the company or if you leave Inland Rail. Do not keep personal copies.

Never

- Falsify any record or make a false or misleading entry including omitting any information
- Circumvent review and approval procedures for reporting financial or non-financial information
- Allow others to do anything that would compromise the integrity of Inland Rail's records or reports
- Disclose or disseminate confidential information or competitively sensitive information without prior authorisation
- Misstate your qualifications, experience or achievements
- Dispose of documents and records without knowing what is being discarded or whether they must be kept for legal reasons.

Scenarios

Q. I have been asked to provide a written update on the progress of one of our team's key improvement initiatives. We are behind schedule, but I know we will catch up in the next month or two. Do I need to specifically say we are behind schedule.

A. All reporting we do across the organisation should be factual and not give the impression that work has been completed when it has not, even if there is a strong belief the work will be completed soon.

Q. Whilst I was travelling in a company vehicle I collided with another vehicle while going around a bend. We both reacted quickly, there was no damage to either vehicle and neither of us were hurt. Do I have to take time out from my job to fill out paperwork and report this as nothing happened?

A. We all have a duty of care to report all accidents and near misses. While in this instance no-one was injured, next time it could be more serious. It's important that all near misses are reported so they can be appropriately investigated and safety measures put in place to prevent a more serious outcome.

Q. During the last environmental monitoring round there were some unusual results. I noted that some individual samples exceeded the limits established by our business. I think this might be a one-off. Do I have to fill out paperwork and report this at the next round of monitoring?

A. Yes. While in this instance there were only a few unusual results, it's important that reporting processes are followed to ensure that any potential issues are identified and can be appropriately investigated, any necessary measures put in place and the relevant individuals can determine if there is a need for external reporting.

Q. I am responsible for approving expense reports for my team. I have six direct reports and some months I don't have time to check to make sure receipts are attached but I trust my team. Do I need to review every receipt?

A. As a line leader you have an additional duty of care to be a positive and visible role model. Whenever you approve anything in the system – an expense report, goods receipt or otherwise – always verify that the underlying transaction is appropriate. It is not undermining the trust you have in your team but a requirement that we have receipts for all our expenses. Check the expenses incurred are work related and copies of all receipts have been attached.



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