

Site

CORPORATE CODE OF CONDUCT

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Introduction

This is the Corporate Code of Conduct (“Code”) for Site Group International Limited (“Site”) and its subsidiaries that sets out the standards of behaviour that each staff member of Site (“you”) is expected to abide by in all dealings related to Site. It applies to all existing and prospective employees, as well as agents and contractors engaged by Site, to be referred to in this document as “you” or “staff”.

This Code provides the ethical and behavioural framework within which we conduct the business of Site every day. Conducting business with personal and professional integrity creates loyalty and trust in employees, customers, the communities in which Site operates, its shareholders, regulators and other stakeholders. It is the foundation upon which Site’s reputation is based.

As a staff member you are expected to:

- have the safety of yourself and those around you at the forefront of your mind at all times;
- be loyal to Site and its subsidiaries;
- understand the laws affecting your duties;
- display integrity in your dealings with others;
- preserve the confidentiality of information ; and
- conduct Site’s work activities in accordance with the local law and principles of good business practice.

On a day to day basis, this means you are expected to undertake your duties safely and conscientiously and to exercise your authority with honesty, integrity, care, skill and diligence. Staff are expected to be familiar with and abide by this Code. To act in a manner contrary to the Code is to engage in behaviour that is considered unethical or unacceptable conduct.

Safety

Site is committed to a safety target of zero harm and will promote and deliver on safe work practices. Behaviour or culture that comprises safety will not be tolerated. Staff should refer to the Safety Policy.

Compliance with the Law

In fulfilling your duties for Site, you are expected to understand and comply with the letter and the spirit of all applicable local laws and regulations. If you are unclear of the impact that the law may have on your role, you should seek advice from the Company Secretary, who may in turn obtain legal advice on the interpretation of the applicable laws and regulations.

To assist in identifying and understanding some of the more common laws and regulations that apply to the business of Site, about which you are expected to be familiar and to comply with, Site has in place written policies to address the manner in which compliance with the relevant law is to be achieved.

Our Key Policies and Procedures are available on Site's intranet site and can be requested in electronic or hard copy from Human Resources.

Equity at Work

Site provides equal employment opportunities to all individuals without regard to race, colour, religion, sex, national origin, age, disability, political beliefs or genetics. Site is committed to providing a work environment in which staff feel that they are a valued member of the organisation, treated fairly and given recognition for their contribution to Site's success.

Site does not tolerate any behaviour or intention to behave in a way that discriminates against another person. Site believes all staff have the right to work in an environment free of discrimination.

Bullying and Harassment

Site is committed to ensuring a healthy and safe working environment, free from hostility, aggression, offensiveness, intimidation and harassment, and any form of unlawful discrimination. Bullying and harassment behaviours within the workplace are unacceptable and will not be tolerated. Staff should refer to the Workplace Bullying and Harassment Policy.

Site requires staff to not tolerate unacceptable behaviour, to maintain privacy during bullying and harassment investigations and to immediately report incidents of workplace bullying or harassment to their Manager or Supervisor.

Fraud and Corruption

Site operates with a zero tolerance of fraud and corruption and is committed to encouraging a culture of openness, honesty and accountability in all who make Site successful.

Site's commitment to a culture of corporate compliance and ethical behaviour is seen as a benefit to everyone who has contact with the company including its directors, employees (whether permanent, part-time, casual or contracted) shareholders and customers. All matters raised by any person will be taken seriously and properly investigated. All staff about whom a suspicion of fraud or corruption has been raised will be treated equally regardless of their position or years of service with Site.

Determination in responding to these suspicions will be made based on findings of fact, actual or potential damage to Site, co-operation by those employees and legal requirements.

The rights of staff who, in good faith, raise concerns regarding a suspicion of fraud or corruption will be protected.

Whistleblower Protection Program

Site recognises that achieving a culture of openness, honesty and accountability will be assisted by an effective whistleblower protection program to encourage you, as well as external parties, to bring to the attention of senior management any conduct that is unethical, dishonest, fraudulent, corrupt, illegal or otherwise unacceptable.

The Whistleblower Protection Program provides a confidential and secure process for anonymous reporting of such conduct without being discriminated against, victimized or harassed. The Whistleblower Protection Program is designed to:

- encourage the reporting of conduct by individuals if they genuinely believe a person has breached Site's Corporate Code of Conduct, policies, the law or engaged in conduct that is unethical, dishonest, fraudulent, corrupt or otherwise unacceptable
- demonstrate Site's commitment to a fair workplace and outline the process for managing conduct that is reported
- protect individuals who, in good faith, report such conduct on a confidential basis, without fear of reprisal, dismissal or discriminatory treatment.

Staff members can submit a Whistleblower Form via the Site Staff Intranet.

Confidentiality

Confidentiality is a key characteristic of an efficient and successful business. You are required to protect proprietary, commercial and other information that is confidential to Site. These obligations of confidentiality arise automatically once you become an employee of Site, and continue after your employment has ceased with Site.

Information that is not generally available to the public concerning the activities, results, strategies or plans of Site must be used for authorised purposes only. Confidential information should be handled and communicated with care and must not be disclosed outside Site without proper authority.

Privacy

Site will only collect, use, disclose and retain personal information that is necessary to meet business requirements in a fair, ethical and lawful manner.

Personal information refers to any information which could identify a staff member. Personal information will be collected in a manner that is not unreasonably intrusive. Site will advise of the purpose for which the information is collected and understand that staff members are able to gain access to the information collected upon request. Site is committed to ensuring that data is appropriately accurate and current and that data is stored no longer than necessary.

Conflicts of Interest

You should not engage in activities or hold or trade assets that involve, or could appear to involve, a conflict between your personal interests and the performance of your duties in the interests of Site. Such circumstances could compromise or appear to compromise your ability to make impartial business decisions. Any conflict of interest or potential conflict of interest that you have must be disclosed to your immediate manager/supervisor or to the Company Secretary.

Gifts from and to Third Parties

From time to time staff members of Site may be offered gifts or other benefits including gratuities, entertainment, reciprocal hospitality and discounts in the course of carrying out their duties.

Gifts and other benefits of any kind should not be accepted either directly or on behalf of any related person or entity where the acceptance of the benefit might influence, or appear to influence, the judgement or performance of a person's duties to Site.

Staff members involved in procurement activities may not accept gifts and other benefits from suppliers or potential suppliers while they are planning for, or conducting procurement activities which involve or may involve those suppliers.

Small gifts (gifts which are not seen or perceived as an inducement to compromise or influence usual business procedure) or invitations to local social or sporting functions are generally acceptable. Accepted gifts and invitations, other than those considered as small gifts or local invitations noted above, are to be recorded in the Gift Register. Employees will only have visibility of gifts they have recorded in the Gift Register. The Company Secretary will have overall visibility of the Gift Register.

Staff members should never offer a gift or other benefit that is not legitimately due, particularly if it puts a party in a situation where they may appear biased or is done with the intent to influence the outcome of an official decision. These gifts or benefits are unacceptable.

Other Expectations

Site staff members are also expected to:

- work collaboratively within the bounds of commercial confidentiality
- not make unauthorised public statements
- treat fellow employees, customers, suppliers, shareholders, regulators and the community with respect and honesty; and
- represent Site professionally and constructively in internal and external interactions.

General

To assist you to understand your obligations under the Code, you will have opportunities from time to time to attend refresher training on the Code.

You are encouraged to ask any questions you may have in relation to the Code or to report any difficulties or challenges encountered in complying with the Code (including any inconsistencies between the Code and the business initiatives of Site) to the Company Secretary.

Ownership

The Company Secretary is accountable for the development and implementation of this Code.

Review

Your feedback will assist in the evaluation of the effectiveness of the Code and will highlight any areas of the Code that may require amendment or additional guidance. This Code will be reviewed and amended by or on behalf of the Company Secretary at intervals deemed appropriate by Site, but at least annually.

Compliance with the Corporate Code of Conduct

Disciplinary action will be taken against a staff member who is found to have breached the Site Corporate Code of Conduct. Disciplinary action may include (but is not limited to) a warning, counselling or dismissal, depending on the severity of the circumstances. Agents and Contractors of Site who are found to have breached this code may have their contracts with Site terminated or not renewed.

Managers and Supervisors will investigate incidences and allegations of code breaches, and will notify of the appropriate action to be taken with the relevant staff member(s).