



QUANTEM
BULK LIQUID STORAGE & HANDLING

Code of Conduct

LEGAL AND GOVERNANCE

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Code of Conduct Framework

(Note: Policies in blue are under development)



QUANTEM
BULK LIQUID STORAGE & HANDLING

Quantem Code of Conduct

	Health Safety Environment	Asset protection	Our People	Business Integrity
External (Published on Website) (Policy/Policy Statement)	<ul style="list-style-type: none"> • Health, Safety and Environment Quality Policy • Drug and Alcohol Policy • Health and Safety Policy (NZ) • Environmental Policy (NZ) • Quality Policy (NZ) 	<ul style="list-style-type: none"> • Privacy Policy 	<ul style="list-style-type: none"> • EEO, Discrimination and Harassment Policy • Diversity and Inclusion Policy 	<ul style="list-style-type: none"> • Whistleblower Policy • Modern Slavery Policy • Supplier Code of Conduct • Anti Bribery Anti Corruption Policy
Internal (Published on Hub) (Guideline/Policy)	<ul style="list-style-type: none"> • Emergency Response Plan • Major accident prevention Policy (NZ) 	<ul style="list-style-type: none"> • Delegations of Authority • Electronic Access Policy • Social Media Policy • Workplace Surveillance Policy • Business Travel and Expense Policy • Document Retention Policy 	<ul style="list-style-type: none"> • Grievance & Complaints Policy • Leave Policy • Performance Counselling and Disciplinary Policy • Recruitment and Selection Policy • Redundancy Policy • Resignation and Termination Policy 	<ul style="list-style-type: none"> • Gifts, Benefits and Hospitality Policy • Procurement Standard

Underpinned by Quantem's Values

Safety	Partnering	Excellence	Accountability	Leadership
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Code of Conduct

1. Purpose

- 1.1 The purpose of this Code of Conduct is to set out the standards by which the Quantem Group of Companies (“**Quantem**”) directors, officers, employees, contractors and agents are expected to conduct themselves, behave towards others and perform their work. It applies to all Quantem business units in Australia and New Zealand.
- 1.2 Quantem believes it is important to aspire to the highest standards of professional and ethical conduct and to make clear the behavioural expectations of its employees, which are underpinned by our values:

Safety ***Safety underpins everything in our business.*** Every person in the business is responsible for creating a safe environment in which we all work. It is a deeply held value that no one should go home injured and this extends beyond our workforce and to our customers, contractors, site visitors and also to the environment.

Partnering We understand our role with our customers, suppliers, regulators and partners. We are perceived as ‘easy to do business with’ and add value to our customers’ businesses. We have a deep understanding of our core business, how to store our products safely, the economy and how it impacts our business and our customers. We are sought after as we are a reliable, efficient and safe business partner.

Excellence We are relentless in our desire to create excellent, safe, reliable and repeatable processes that drive value not only for our business but also for all our external stakeholders. We are a learning organisation and will evolve every year because of what we have learnt.

Accountability We are committed to delivering against what we say we will do. We take personal accountability for tasks that we are responsible for and we know the role we play in the team, for the team and business to meet its deliverables. We are action oriented and take opportunities to deliver above and beyond safely.

Leadership We see leadership as both formal and informal within the business. Whether or not you have direct reports, we believe that everyone plays a role in setting the tone of the culture and that everyone can be a leader or role model within a process.

2. Scope and Responsibility

- 2.1 This Code of Conduct applies to all Quantem directors, officers, employees, contractors and agents.
- 2.2 This Code of Conduct is divided into the following areas:
 - Our People.
 - Protecting Health, Safety and Environment.
 - Protecting Quantem Assets.
 - Business Integrity and Ethics.

3. Our People

- 3.1 Quantem is committed to providing a workplace where employees are given equal access to opportunities and can thrive in an environment which is free from harassment, discrimination, and

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bullying. We believe all our employees have a role in being a leader and role model in setting this culture.

3.2 You are expected to:

- ✓ follow all lawful and reasonable directions given to you.
- ✓ comply with all Quantem policies and procedures.
- ✓ conduct yourself professionally and politely when at work and outside of work while undertaking Quantem related business.
- ✓ dress and behave appropriately, including use of appropriate language.
- ✓ behave in a non-discriminatory manner at all times (this includes respect for a person's race, colour, religion, national origin, age, sex, sexual orientation, marital status, family responsibilities, pregnancy or potential pregnancy, union membership or non-membership, and mental or physical disability).
- ✓ not engage in bullying or harassment.
- ✓ have regular attendance and provide valid justification for tardiness.

3.3 Listed below are examples of behaviours which can lead to immediate termination of employment:

- X Harassment, bullying, and discrimination.
- X Hitting, pushing, or otherwise striking another person or any other disorderly conduct while on a Quantem or customer site or arising out of Quantem's business activities.
- X Gambling on Quantem or customer property.
- X Walking "off the job" during working hours without informing your supervisor.

3.4 For further information relating to Our People, refer to the following Quantem Policies:

- ❖ EEO, Discrimination and Harassment Policy
- ❖ Grievance and Complaints Policy
- ❖ Diversity and Inclusion Policy

4. Protecting Health, Safety and Environment

Health and Safety

4.1 Safety underpins everything in our business and is a core value at Quantem. We are committed to providing and maintaining a safe and healthy environment for our workers and visitors. No one should go home injured, and this extends beyond our workforce and to our customers, contractors, site visitors.

4.2 When working for Quantem, you are expected to:

- ✓ Take reasonable care, behave, and perform your work duties in a safe manner.
- ✓ Never report for work in circumstances where there is a risk that you could be affected by or impaired by, or 'under the influence of' drugs or alcohol. You are to arrive at the workplace in a fit state for work. Quantem have a zero tolerance (0%) for illegal drugs and alcohol in the workplace.
- ✓ Wear the appropriate PPE for the tasks being completed, and work in alignment with the appropriate procedures.
- ✓ Only use equipment or tools in which you are trained and competent.

4.3 Listed below are examples of behaviours which can lead to immediate termination of employment:

- X Gross carelessness or gross negligence endangering the safety of or causing injury to other personnel.

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- X Tampering with locks or seals without proper authorisation.
- X Not following documented operational procedures.
- X Bypassing safety controls.
- X Wilful damage to Quantem, customer, or employee property.
- X Arriving at work under the influence of alcohol, illegal drugs or inhalants, or the use, sale or dispensing of the same on Quantem or customer premises, or otherwise reporting to work in a manner unfit to perform work duties.
- X Sleeping on the job.
- X Smoking in prohibited areas.
- X Possession or use of firearms or other lethal weapons on Quantem premises or in the course of performing Quantem duties.

Environment

- 4.4 Quantem is committed to safety which extends to the environment in which we operate and includes complying with all laws, environmental regulations, and reporting requirements. It is important to observe the environmental regulations relating to Quantem's business. Since environmental regulations often change, employees should periodically review the environmental practices applicable to their area of responsibility.
- 4.5 You are expected to:
- ✓ Follow all documented procedures.
 - ✓ Understand the loss of any containment can be a major incident.
 - ✓ Report all incidents into Integrum and to your Supervisor as soon as possible.
- 4.6 Listed below are examples of behaviours which can lead to immediate termination of employment:
- X Failure to report spills.
 - X Not following documented procedures.
 - X Gross negligence causing major spillage.
 - X Breaching environmental licence conditions

Quality

- 4.7 At Quantem we value excellence and partnering which includes providing our customers with service excellence and strict control over product quality, setting targets and monitoring performance to achieve excellence and driving continuous improvement.
- 4.8 You are expected to:
- ✓ Avoid contamination from other products.
 - ✓ Diligently follow procedures that impact quality.
 - ✓ Verify product delivery information.
 - ✓ Provide prompt and diligent service.
 - ✓ Ensure customer information is accurate.
- 4.9 Listed below are examples of some behaviours which can lead to immediate termination of employment:
- X Failure to report product contamination.
 - X Gross negligence causing substantial product contamination.
 - X Not following documented procedures.

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4.10 For further information relating to Protecting Health, Safety and the Environment, refer to the following Quantem Policies:

- ❖ Health, Safety and Environment Policy.
- ❖ Drug and Alcohol Policy.
- ❖ Health and Safety Policy (NZ).
- ❖ Environmental Policy (NZ).
- ❖ Quality Policy (NZ).

5. Protecting Quantem's Assets

5.1 In the course of your work with Quantem, you will be provided with access to Quantem property, including but not limited to tools and equipment, charge and credit cards, security passes and keys, computer and other electronic equipment, motor vehicles, mobile phones, intellectual property, confidential information, and any other item to which Quantem has an entitlement to possession (**Quantem Property**). We are all accountable for protecting Quantem Property and the safe and proper use of Quantem Property.

5.2 You are expected to:

- ✓ Act within the terms of your Delegations of Authority at all times.
- ✓ Use Quantem Property for Quantem related business only.
- ✓ Not use improper or unapproved devices to perform your work.
- ✓ Maintain confidentiality of all information, records or other materials acquired during your employment or engagement with Quantem.
- ✓ Not engage in any conduct that might damage the reputation of Quantem or any of its directors, officers or employees.
- ✓ Protect all of the Quantem Property, tangible and intangible, from loss, theft, or misuse including taking due care to secure such property whenever left unattended, whether it is in use by another person or is being transported or stored, and whether it is onsite or offsite at the time. You must immediately report any loss of Quantem Property and any breach or suspected breach to the security of Quantem Property, whether past, present or potential, to their manager.
- ✓ Protect and keep confidential all computer passwords, IDs and other system and network access information.

5.3 Listed below are examples behaviours which can lead to immediate termination of employment:

- X Using Quantem Property for any unlawful or improper purpose.
- X Using Quantem Property for the commercial benefit of any person or organisation other than Quantem.
- X Wilful damage to or theft of Quantem Property or the property of a customer or another employee.

5.4 This obligation to safeguard Quantem Property and keep information confidential continues after termination of employment, whether voluntary or involuntary. You may be held personally responsible and liable in respect of any loss of Quantem Property where that loss could reasonably be considered to have been avoidable in the individual circumstances of the case. Such personal liability may extend up to the full cost of replacement.

Confidential Information, Intellectual Property and Privacy

- 5.5 As part of your work at Quantem, you may have access to confidential information about Quantem, its customers, suppliers, or competitors (**Confidential Information**) such as:
- Trade secrets of Quantem.
 - Information about the business and affairs of Quantem such as its products, services offered, financial accounts and reports, customers, marketing and/or strategy plans, client proposals, sales plans, client prospects, information about fees, pricing information, supplier lists, research, financing, inventions, designs, procedures or processes, security information, sales and training materials, and operational information and methods.
 - Information about customers of Quantem, such as their specific requirements, arrangements, and past dealings with Quantem.
 - Customer names and addresses, customer lists, business cards and diaries, calendars, or schedules.
 - Computer databases and computer software.
 - All other information obtained from Quantem or obtained in the course of your employment with Quantem, that is by its nature confidential.
- 5.6 As part of your work at Quantem, you may also be required to collect, store and handle personal information, including personal information relating to Quantem employees, contractors, suppliers, customers and other stakeholders.
- 5.7 We are all accountable for safeguarding Confidential Information and Intellectual Property and maintaining privacy of personal information.
- 5.8 You are expected to:
- ✓ secure custody of Confidential Information in your possession or control;
 - ✓ use your best endeavours to prevent the unauthorised use or disclosure of Confidential Information;
 - ✓ comply with all applicable privacy laws when handling personal information; and
 - ✓ Respect Quantem and third-party intellectual property rights. Never infringe on the valid copyrights, trademark, or patent rights of others. This includes unauthorised copying of copyrighted materials, using a name for a product or service that is confusingly similar to a trademark or service mark used by another company for a similar product or service, or developing and selling a product or service that is protected by the valid patent of another.
- 5.9 You must not, at any time during or after the termination of your employment for any reason, directly or indirectly disclose or use (or attempt to disclose or use) any Confidential Information for your own benefit or the benefit of any other person or entity.
- 5.10 You must not, without the prior consent of the Chief Executive Officer of Quantem, communicate with or disclose to any representative of the media any information of any nature whatsoever relating to Quantem or its customers, or otherwise purport to make any public comment on behalf of any of them. In most cases the Chief Executive Officer or authorised delegate will be the only individual making any public comment on behalf of Quantem.
- 5.11 For further information refer to the following Quantem Policies:
- ❖ Delegations of Authority.
 - ❖ Privacy Policy.
 - ❖ Social Media policy.
 - ❖ Electronic Access Policy.
 - ❖ Business Travel and Expense Policy.

6. Business Integrity

- 6.1 Quantem is committed to promoting the highest standards of honest and ethical conduct through the establishment and operation of policies that:
- Encourage professional integrity in all aspects of the organisation by eliminating inhibitions and barriers to responsible behaviour such as coercion, fear of reprisal or alienation from the organisation.
 - Prohibit and eliminate the appearance or occurrence of conflicts between what is in the best interest of Quantem and what could result in material personal gain for any member of the organisation.
 - Provide a mechanism for members of the organisation to inform senior management of deviations in practice from policies and procedures governing honest and ethical behaviour.
- 6.2 We are all accountable for ensuring our conduct is at all times honest and ethical and in accordance with all applicable laws.
- 6.3 You are expected to:
- ✓ Behave ethically, with integrity and appropriately during the course of your employment or engagement with Quantem.
 - ✓ Comply with all local, state/territory and federal laws, including competition laws, anti-bribery, anti-corruption, and modern slavery laws.
 - ✓ Not make personal profit or gain in connection with your employment or engagement with Quantem.

Conflict of Interests

- 6.4 You must use your best endeavours to promote and enhance the interests, business, profitability, and reputation of Quantem, and you must not intentionally do anything which is reasonably likely to be harmful to Quantem.
- 6.5 While you are employed by Quantem, you must not:
- X Have or permit to exist any conflict of interest between you and Quantem, unless you have at the earliest opportunity declared all the circumstances creating the conflict of interest to your manager, and have obtained Quantem's consent in writing permitting the existence of that conflict; and/or
 - X Undertake any other business or profession, be an employee or agent for reward of any other business or person or assist or have any interest in any other business or profession, without obtaining the consent in writing of Quantem.

Relationships with Suppliers

- 6.6 One of Quantem's core values is partnering and we believe that Quantem's business is built on integrity in dealing with customers, suppliers and third parties. Quantem is committed to informed and balanced procurement decision making processes and procurement activities shall be performed with integrity and all tendering processes conducted in accordance with the requirements of the Procurement Standard and any associated procedures, relevant legislation, and Australian Standards.
- 6.7 In dealing with new or potential suppliers you are expected to:
- ✓ Make sure suppliers are reputable, competent, and qualified to perform the work, and that the compensation sought is reasonable.

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- ✓ Award business based on merit, qualifications, experience and consider the benefits and risks to the community, economy and environment using objective selection and evaluation criteria. Always review required certifications before awarding business to a supplier.
- ✓ Share the Supplier Code of Conduct with potential suppliers early in any supplier solicitation and selection process and with current suppliers.
- ✓ Observe any duty of confidence owed in relation to any information provided to us by suppliers (e.g., passing on price information to a third party).
- ✓ Ensure anything which could cause, or be construed as creating the appearance of, a conflict between an employee's private interests and Quantem interests, is declared immediately by the employee to their manager.
- ✓ Never say or write anything that a potential supplier may interpret as a commitment to do business unless that is Quantem's specific intention. If you have questions about what constitutes a legal commitment, consult the Chief Executive Officer.
- ✓ Reject any reciprocal agreement with a supplier that restrains or may appear to restrain competition. Such agreements violate Quantem's policy and may violate the law.
- ✓ Never interfere with a supplier's contracts or business relations with a competitor of Quantem.

6.8 Employees may seek advice from their supervisor or Procurement Manager if they have concerns about dealing with suppliers

Gifts and Hospitality

6.9 Gifts, entertainment, and other hospitality are often provided for a legitimate business purpose, such as building legitimate business relationships. However, the giving and receiving of gifts, entertainment and hospitality pose a risk that they may compromise, or have the appearance of compromising, commercial relationships Quantem has with third parties.

6.10 You are expected to:

- Ensure that any gifts or hospitality are given or received in accordance with Quantem's Gifts, Benefits and Hospitality Policy
- Never accept any offers of gifts or other inducements of value and advise the supplier that Quantem does not permit employees to accept gifts or inducements.
- Refuse personal discounts or special offers based on a supplier's actual or potential relationship with Quantem, except through a program approved for all Quantem employees, contractors or agents.

6.11 No employee, contractors, consultant, or agent(s) acting on Quantem behalf should either directly or indirectly solicit or accept gifts, hospitality or any other form of inducement offered by supplier involved in current or future tendering activity. See the Gifts, Benefits and Hospitality Policy.

Accuracy of Reports, Records and Accounts

6.12 Accurate information is essential to Quantem's ability to meet legal and regulatory obligations and to compete effectively and as part of our commitment to excellence.

6.13 You are expected to:

- ✓ Ensure that Quantem records, accounts, time sheets, and reports are accurately kept.
- ✓ accurately report time worked, vacation time, etc. on a no less than monthly basis.

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- 6.14 Listed below are examples behaviours which can lead to immediate termination of employment:
- ✕ Falsification of employment application, other documents, or records that the employee is required to complete.
 - ✕ Wilful falsification of Quantem or customer records.
- 6.15 No-one should create any false or misleading documents or accounting, financial or electronic records for any purpose, and no one may direct any Quantem employee, contractor, or agent to do so. For example, expense reports must accurately document expenses actually incurred in accordance with Quantem policies.
- 6.16 If any you have any questions or feel you are being asked to create a document or electronic record in a less than complete, honest, and accurate manner, you should immediately report this to either your manager, Human Resources, the General Counsel and Company Secretary or under the Quantem Whistleblower Policy.
- 6.17 For further information relating to Business Integrity, refer to the following Quantem Policies:
- ❖ Procurement Standard.
 - ❖ Supplier Code of Conduct
 - ❖ Modern Slavery Policy.
 - ❖ Gifts, Benefits and Hospitality Policy.
 - ❖ Whistleblower Policy.

7. Failure to Comply

- 7.1 Failure to comply with this Code of Conduct may result in disciplinary action which may include:
- counselling;
 - verbal or written warnings; or
 - termination of employment in the case of employees and termination of contract in the case of agents and contractors.

8. What to do if you suspect a breach of the Code of Conduct

- 8.1 We are all accountable to each other to ensure that the standards of behaviour set out in this Code of Conduct are maintained. We believe in the importance of open communication, and anyone should feel they can raise a concern about any actual or suspected breach of this Code of Conduct without fear of reprisal.
- 8.2 If you are aware of, or suspect any breaches of this Code of Conduct, you should report the matter to either:
- an Executive Leadership Team Member
 - Human Resources; or
 - the General Counsel and Company Secretary.
- 8.3 You may also confidentially report any actual or suspected breaches of this Code of Conduct under the Quantem Whistleblower Policy.

9. Review

- 9.1 This Code of Conduct may be varied, amended, or replaced from time to time and will be subject to periodic review.