

BRIDGEMAN CODE OF CONDUCT & BUSINESS ETHICS POLICY

Bridgeman is an Indigenous owned, operated and Supply Nation certified company. We have been delivering end-to-end solutions in Queensland and across Australia for more than 25 years. Our company operates across the primary areas of metal manufacturing and construction solutions.

1. Purpose

Bridgeman is committed to achieving high standards of ethical behaviour and to conducting business in accordance with Company standards, applicable laws and regulations.

This Code of Conduct (thereafter referred to 'Code' or 'the Code') outlines the standard of behaviour expected by Bridgeman employees. It is designed to assist you in understanding your responsibilities and obligations and to provide guidance on expected behaviour in the workplace including when you may be faced with an ethical dilemma or a conflict of interest in your work.

2. Scope

This Code applies to all employees of Bridgeman, directors, and any other party who represents Bridgeman.

The obligations in the Code are to be read in conjunction with Bridgeman policies, procedures, site specific policies, and industrial instruments. A full list of Bridgeman policies and procedures is available on the Bridgeman Management System or human resources.

3. Policy

You are required to familiarise yourself with the Code and endeavour to ensure that its principles are observed at all times. This document does not seek to cover all possible scenarios which may arise during your employment or engagement with Bridgeman, however it provides a set of principles to guide you on acceptable and unacceptable behaviour.

Should you disregard or breach the Code and associated policies, disciplinary action may be taken. This may include termination of your employment or your engagement.

4. Incorporated Policies

Bridgeman policies should be read in conjunction with this Code. These can be found on the Bridgeman Management system, from your Manager or from Human Resources.

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6. Core Guiding Principles

6.1 Values

Our Values of integrity, respect, diversity and innovation shape who we are as a Company. They guide us in our everyday work and behaviours, in the decisions we make and how we treat each other, our clients and our stakeholders. This Code confirms this commitment, outlines our expectations and promotes a culture of fair and ethical behaviour. Each and every one of us has a responsibility to act in accordance with our Values which are the principles underpinning our Code of Conduct.

6.2 Compliance with the Law

You are expected to act with integrity, which includes being aware of and acting within all current and applicable laws and regulations. You are:

- expected to comply with all applicable laws and regulations,
- encouraged to keep abreast of legal and industry developments that may impact your work activities, and
- expected to understand Bridgeman's policies, standards and procedures relevant to your area of work. If you are concerned about a particular law, regulation, policy, standard or procedure, please contact your manager. If a law conflicts with a policy in this Code, you must comply with the law.

6.3 Safety

The health and safety of workers and other persons is a high priority to Bridgeman. It is the policy of Bridgeman to conduct its activities in such a way as to provide a working environment that protects the health and safety of all persons at the workplace and actively encourages safe working practices.

To aid in the implementation of this policy Bridgeman will:

- comply with all relevant statutory obligations, regulations, codes of practice and industry standards and make adequate provision of resources to meet these requirements
- provide sufficient information, instruction and training for workers to increase personal understanding of workplace risks and hazards and to ensure proper supervision.
- involve workers, including subcontractors and their representatives, on health and safety matters, and consult with them on ways to manage risks and hazards and improve the Bridgeman Safety Management System.
- set short and long-term objectives and targets in health and safety management as part of an ongoing action plan and regularly review its performance and that of its managers and supervisors against these.
- report health and safety matters including details of risks, incidents and performance measures in relation to objectives and targets, to relevant supervisors and managers for the purpose of developing an open and informed culture surrounding health and safety.

Health and safety is both an individual and shared responsibility of all workers and other persons involved with the operation of the Company. You must:

- take reasonable care for your health and wellbeing, and safety and that of others.
- comply with reasonable instruction that is given by management, which ensures you are in line with Bridgeman Workplace Health and Safety Policy, the associated Performance Standards and Procedures, and the applicable health and safety legislation and regulations

6.4 Environmental Management

Bridgeman is committed to sound environmental management and our business priorities and practices proactively support appropriate environmental protection.

You are expected to follow all reasonable directions given by Bridgeman about preventing environmental harm and must:

- strive to reduce environmental harm, to the extent reasonably practicable, by maximising the efficient
- use of natural resources, energy, water and raw materials and minimise pollution (including greenhouse gases pollution) and waste;
- comply with all requirements of the Bridgeman Environmental Policy;
- comply with Bridgeman Environmental procedures, plans and directions and where requested, implement and maintain a written and approved environmental policy which meets or exceeds relevant minimum
- standards, and where required, observe recognised sustainability accreditations; and
- not wilfully or recklessly cause environmental harm or interfere with or misuse anything provided on site for environmental protection.

Bridgeman maintains a strong commitment to ensuring its business activities do not negatively impact the natural environment. We aim to achieve a high standard of environmental performance by complying with current legislation and through the application of environmental management systems. The Company continually assesses its environmental impact, however if you have any concerns, you should report them to your manager in the first instance.

6.5 Cultural Heritage

Bridgeman is committed to respecting cultural heritage sites.

Cultural heritage includes both physical objects and artefacts, along with places that are associated with spiritual significance such as ceremonial sites, burial grounds and places that have special creation importance. Access to these sites is restricted, you must only enter these sites with written approval from Bridgeman and the Traditional Owners (procured by Bridgeman).

You must comply with direction from Site Management in relation to cultural heritage, sacred sites and any applicable exclusions zones. Failure to do so will result in immediate removal from site, disciplinary action and/or termination of employment.

7. Employment

7.1 Professional Conduct

Bridgeman expects all employees, directors, and any other party who represents the Company to observe the high standards of ethics and integrity in their conduct. This means that, in addition to any duties or responsibilities assigned to you by Bridgeman, you must conduct yourself in a professional way at all times. This includes a requirement that you must:

- Always act diligently and perform your duties with reasonable care and skill.
- Refrain from acting or giving the appearance of acting contrary to the interests of Bridgeman.
- Not solicit or attempt to persuade any clients of Bridgeman to use the services of any other businesses.

- Not disclose or share any information acquired during and after your employment which is confidential to Bridgeman.
- Notify Bridgeman promptly about anything you become aware of which may affect your ability to carry out your duties promptly and efficiently.
- Maintain a professional standard of conduct and performance in all matters relating to Bridgeman's operations.
- At all times act in a manner which will protect and enhance Bridgeman's reputation.
- Comply with all lawful and reasonable directions given by Bridgeman or by its managers in relation to your employment/engagement.
- When requested provide Bridgeman with a complete account of anything that relates to matters you are handling or which may concern Bridgeman

7.2 Fair, Safe and Ethical Workplace

To support its commitment to workplace diversity Bridgeman develops and monitors proactive policies and practices for fairness and freedom from unlawful discrimination. Everyone is entitled to be treated with respect and experience a safe work environment free from harsh/unfair treatment, discrimination, harassment, victimisation, vilification, and bullying.

You are personally responsible for ensuring that your behaviour is not offensive, intimidating, or disrespectful of other people within the workplace. Bridgeman does not condone any form of unlawful discrimination and expects you to know and to adhere to the related policies and procedures which set a minimum standard of what is acceptable.

7.3 Crime and Antisocial Behaviour

Bridgeman has no tolerance for antisocial behaviour. Antisocial behaviour is an unacceptable activity that causes harm to individuals, the company or the community.

Antisocial behaviour incorporates a range of conduct from minor offensive or harmful acts, to more serious criminal activity. This includes:

- abusive or violent behaviour towards another person
- creating alarm, fear or annoyance to an employee or others in the area
- graffiti, littering or vandalism
- tampering with machinery
- threatening, intimidating, abusive, frightening and harassing behaviour directed at others
- moderate damage to property belonging to the company or community that is intentionally caused or permitted.
- abusive, aggressive or frightening behaviour directed at others that extends beyond verbal abuse
- threats to the health and safety of a person
- use or threatened use of a weapon
- theft of company property
- physical assault and acts of violence
- carrying out an act of sexual assault
- serious incapacity caused by alcohol or other drugs

You are expected to always maintain a high standard of behaviour while in our workplaces and sites and when engaging with or travelling through local communities. Breach of this requirement will result disciplinary action which may include immediate removal from a workplace or site and/or termination of employment.

7.4 Firearms and Weapons

Firearms and other weapons must not be brought on to any Bridgeman workplace or site. Breach of this requirement will result disciplinary action which may include immediate removal from a workplace or site and/or termination of employment.

7.5 Alcohol and Drugs

Bridgeman is committed to reducing the risk of alcohol and other drug related incidents in our workplaces/sites and in the communities in which we work. We do not condone the use of substances that may impair your ability to perform your role safely and effectively or which could put at risk the health and safety of your colleagues, those around us or the local community.

All employees, workers, and visitors including those in office environments, are expected to present for work in a fit state to undertake their duties safely at all times.

Illegal drugs are not permitted to be brought into any Bridgeman workplace or site. Any breaches of policy or incidents will be acted on immediately and may be referred to the police.

Alcohol is not permitted to be brought into any Bridgeman workplace unless pre-authorized by the Managing Director, Chief Executive Officer or General Manager. Bridgeman acknowledges that alcohol may be consumed at some functions or events involving employees, including Company initiated activities. When attending a function as a representative of the Company, you are expected to conduct yourself responsibly within the bounds of Bridgeman policies. If you choose to consume alcohol you must do so responsibly and arrange for safe transportation to your place of residence.

When entering any Bridgeman workplace or site you must:

- undertake alcohol testing when requested and have a 0.00% Blood Alcohol Concentration (BAC)
- undertake drug testing when requested and have a drug test result below the cut off levels specified by the relevant Australian Standard AS/NZS 4308:2008 or as determined by a Bridgeman medical or other advisor;
- inform Bridgeman Site and Manufacturing Management if you are taking medication, including prescribed or pharmaceutical drugs;
- not be in possession of drug paraphernalia;
- participate in the company's Fitness for Work monitoring programs as directed;
- comply with Bridgeman site or office directions relating to the use of cigarettes, including e-cigarettes and vapes, which must be confined to designated areas; and
- comply with all requirements of the Bridgeman Alcohol and Other Drugs policy

You must not consume alcohol or smoke (see definition in 7.6 below) in a Bridgeman company vehicle. Smoking/ECigarettes/Vaping

To meet our Workplace Health and Safety requirements, our client expectations and social/community expectations, Bridgeman policy restricts smoking in outdoor areas of our workplaces/sites. This means that we strictly prohibits smoking, vaping or use of e-cigarettes on our sites, workplaces and premises except if there is a clearly designated smoking/vaping zone.

Smoking is defined as the act of lighting, smoking or carrying a lighted or smoldering cigar, cigarette or pipe of any kind. This includes electronic nicotine delivery systems or electronic smoking devices such as e-cigarettes, e-pipes, e-hookahs and e-cigars. Smoking, e-cigarettes or vaping is not permitted in any work/company vehicle (of any kind) operated by Bridgeman.

7.6 Conduct at Social Functions

At certain other times in the year there may be work social functions organised for employees. These functions may be held either on our business premises or at another venue. Customers and business colleagues may sometimes attend these functions.

You are personally responsible for ensuring that your behaviour is consistent with the standards expected in our workplace. The following points relating to work social functions are expected to be met by all staff:

- Use of illegal drugs is prohibited.
- The smoking/e-cigarette/vaping policy of the venue must be respected.
- Excessive consumption of alcohol is inappropriate.
- Offensive language or behaviour is inappropriate.
- Respect for managers giving reasonable directions is expected.
- Reasonable care of the facilities is expected.
- Behaviour consistent with our policies must be adhered to

7.7 Employment Testimonials and References

From time to time you may be approached to provide employment references and testimonials about former or current employees. References made on behalf of Bridgeman can have adverse legal and reputational implications so if you are asked to comment on an individual's work performance you should only comment verbally where you have directly managed or supervised their work at Bridgeman and are able to make an accurate assessment. You should also seek consent from the employee prior to comment.

7.8 Use of Company Vehicles

If you are assigned or use a Company vehicle, you are required to exercise good judgement and driving practice to ensure the utmost safety of all passengers including yourself.

Company vehicles must be driven at safe speeds, according to the road conditions, and within legal speed limits at all times. All road and traffic regulations and by-laws must be observed at all times. All site or Bridgeman imposed rules or restrictions must also be adhered to. Every courtesy must be shown to other road users and pedestrians.

You are fully responsible for the vehicle while it is in your charge and as such you are responsible for ensuring proper care and maintenance of the vehicle, reporting any damage or maintenance issues and reporting any inappropriate behaviour of passengers.

If you are required to drive a Company vehicle either on a regular or irregular basis you are responsible for ensuring that you are familiar with the Motor Vehicle Policy.

You must not consume alcohol, smoke/vape or use e-cigarettes in a Bridgeman company vehicle.

7.9 Secondary Employment

Bridgeman recognises that you may choose to engage in paid or unpaid secondary employment. Secondary employment should not create a conflict of interest with your duties to Bridgeman or impact on your ability to safely and competently perform your duties at Bridgeman. Any potential conflicts or impacts must be disclosed to and approved by your manager. Such approval must be received prior to commencement of your alternative employment or upon commencing with Bridgeman as appropriate.

7.10 Travel

When conducting business on behalf of Bridgeman, you may be required to travel within Australia or overseas. At all times during such travel, you are considered ambassadors of Bridgeman and are responsible for representing the Company in a positive and appropriate manner.

8. Use of Information

8.1 Corporate Opportunities

Employees have an inherent duty of care to act in the best interests of the Employer and as such you should not engage in any activity in competition with Bridgeman. This means that you must not use any business opportunity learned through the use of Bridgeman property or information, or through your position with us, for personal gain. In addition, you may not use Bridgeman property or information or your position with us for improper personal gain.

Your obligation extends to our proprietary information. Proprietary information includes intellectual property such as trade secrets, patents, trademarks and copyrights; as well as business, marketing, tendering/pricing and service plans, engineering and operating ideas, designs, databases, records, salary information and any unpublished financial data and reports. Any unauthorised use or distribution of this information is a breach of our policy. It could also be illegal and result in civil and criminal penalties.

8.2 Confidential Information

In the course of your duties, you may receive or have access to confidential information about the Company or its customers or suppliers. All information and other materials concerning Bridgeman are confidential and you are required to observe such confidentiality at all times, unless or until such information forms or becomes part of information in the public domain, where upon to the extent it is public the obligation shall cease. In case of uncertainty, you shall treat information and material as confidential until a clearance is obtained from a Bridgeman Leadership team manager.

8.3 Privacy Obligations

For the purposes of its business operations, Bridgeman collects and holds information obtained from various people and groups including but not limited to:

- Clients;
- Suppliers or subcontractors;
- Employees;
- Potential or future employees; and
- Public authorities

Privacy is of utmost importance to Bridgeman and you must respect and maintain the privacy of personal information held by the Company. The Bridgeman Privacy Policy exists to ensure that all personal information is handled in accordance with the requirements under privacy legislation. You

are required to observe the requirements of this policy and may not use or disclose the personal information of others to a third party unless permitted by law to do so.

8.4 Media and Public Relations

Efficient and effective media and public relations practices assist the Company in maximising its positive public relations exposure in the most cost-effective and risk-free manner possible. Given the significant impact media exposure can have on Bridgeman and the number of key messages that the Company can be dealing with on any given day, it is imperative that all media messages are initiated, formulated, and delivered in a consistent way. Except as expressly authorised by the Chief Executive Officer, Managing Director or General Manager, you must not make public representations on behalf of Bridgeman or make any public comments which may be construed as representing the official views of the Company.

9. Protection and Proper Use of Company Property

9.1 Use of Company Assets

You should protect our assets and ensure their efficient and professional use. Theft, carelessness and waste have a direct impact on our profitability. Any suspected incident of fraud or theft should be immediately reported for investigation.

Our equipment should not be used for non-Company business, although incidental personal use may be permitted in limited situations. If you are unsure of what is reasonable or appropriate, please refer to your manager for clarification.

Your obligation to protect our assets includes our proprietary information. Proprietary information includes intellectual property such as trade secrets, patents, trademarks and copyrights; as well as business, marketing, tendering/pricing and service plans, engineering and operating ideas, designs, databases, records, salary information and any unpublished financial data and reports. Any unauthorized use or distribution of this information is a breach of our policy. It could also be illegal and result in civil and criminal penalties.

9.2 Use of Information Systems and Hardware

We support a wide range of electronic devices and networks to help us work as effectively and productively as possible. Personal computers, laptops, internet access, email and other systems significantly enhance our productivity. When used inappropriately they may expose our data and systems to substantial risk.

You must never:

- Use Bridgeman information systems to bully or harass co-workers including accessing, transmitting or storing offensive material
- Use the Bridgeman information systems to break the law or violate Company policy
- Use social networking sites to comment adversely about the Company, its employees, clients, subcontractors or other persons connected with our business
- Be frivolous or negligent in protecting information communicated or stored on Company information systems or in safeguarding hardware, software and data against damage, loss, theft, alteration and unauthorised access.

Our information systems are organisational resources and as such employee use is monitored.

10. Ethics and Business Conduct

10.1 Fraud and Unethical Conduct

Bridgeman has no tolerance for fraudulent or unethical conduct. You are expected to use good judgment in all dealings with individuals, customers or other companies and conduct your business affairs so that Bridgeman's integrity remains unquestionable.

For the purposes of this Policy, fraudulent or unethical conduct is the misconduct by a person associated with Bridgeman via their employment or engagement which is:

- dishonest;
- fraudulent;
- corrupt;
- unethical;
- likely to cause financial or non-financial loss to Bridgeman or be otherwise detrimental to the interests of Bridgeman;
- contrary to other policies and procedures of Bridgeman or legal requirements, in a material way;
- any other misconduct of a serious nature (including but not limited to gross mismanagement, the creation or condoning of serious and substantial waste, or failure to disclose a related party transaction, etc); or
- deliberately conceals actions or behaviour mentioned above.

Fraudulent or unethical behaviour could include conduct such as stealing company property from Bridgeman, receiving undisclosed financial "kickbacks" for facilitating Bridgeman entry into contracts with suppliers, or receiving cash payments related to work undertaken on behalf of Bridgeman which has not been disclosed and/or remitted to Bridgeman. Fraudulent or unethical behaviour could also include failing to notify and/or attempting to conceal a health, safety or environmental incident, in breach of Bridgeman and legal reporting requirements.

You are encouraged to report any behaviour or situation which you consider breaches or potentially breaches this Code or the law. Bridgeman will not tolerate the victimisation of those who come forward to report it.

Reports can be made to any Leadership Team member (CEO, Managing Director, General Managers), or to Bridgeman. Protected Disclosure Officers as per our Whistleblower Policy.

10.2 Conflict of Interest

In order to maintain the high standards of integrity and reputation, it is essential that you declare any interest that you may have that could give the appearance of a conflict.

You must conduct all business transactions in the best interests of Bridgeman, and for a proper purpose. A conflict of interest occurs when you compete against Bridgeman in a business activity or divert business from Bridgeman, or allow any interest, activity or influence outside of Bridgeman to influence your judgement when acting on behalf of Bridgeman.

Some examples include, directing Bridgeman business to a supplier owned or managed by a relative, related party or friend, using Bridgeman equipment for personal use or to assist an outside business, working on Bridgeman property or in Bridgeman time for anyone other than Bridgeman, unless authorised to do so.

Actual, potential or perceived conflicts of interest could influence or be seen to influence your work decisions or actions and must be reported immediately.

If you become aware that your employment has resulted in, or may result in, a conflict of interest you must immediately notify the Chief Executive Officer, Managing Director or General Manager Bridgeman Building Group or Bridgeman Manufacturing.

10.3 Gifts and Hospitality

Giving and receiving gifts and hospitality can be normal practice in many business cultures where Bridgeman operates. Offering and receiving gifts and hospitality may be appropriate to mark high level meetings and key business milestones. However, inappropriate acceptance or offers of gifts and hospitality are discouraged and may, in some circumstances, be illegal and create a situation of actual or perceived conflict of interest.

You must not seek, accept, provide, offer or cause to be provided with gratuities (for example, bribes, kickbacks, gifts, entertainment, payments or any other benefit) beyond those which are considered legitimate business practices. As a general rule, do not accept or offer gratuities that could be perceived as a reward for preferential treatment or creating a business obligation.

If you accept something that could be seen as improper, please report it immediately to your manager.

The acceptance of gifts and hospitality is acceptable in situations where it is in accordance with normal business practice (i.e. where the exchange of gifts is customary and the gifts are appropriate for the occasion), however they must be appropriate in the circumstances, must not have the potential to embarrass Bridgeman, and must be consistent with local customs and traditions.

If a contract is being negotiated or tendered, you must not accept any invitations for events or gifts from any existing or potential vendors or service providers, until following the formal awarding of a contract. Under no circumstance can you make facilitation payments (for example, minor payments to secure or expedite a routine Government action). This is in line with the anti-corruption laws of various countries and every effort should be made to resist such payments. If you have any concerns about acceptance or offering of gratuities, or requests for facilitation payments, please speak with your manager, who will refer it to the CEO, Managing Director or General Manager if necessary.

All gifts and hospitality with a total value of \$300.00 or more must be notified.

10.4 Political Association

Bridgeman maintains an impartial position when it engages with all levels of Government.

We understand that you may wish to participate in your country's political process in your capacity as a private citizen. When doing so please be mindful to ensure that your actions and opinions are characterised as your own and not representative of Bridgeman.

10.5 Antitrust and Unfair Competition Laws

Bridgeman believes that vigorous and fair competition is in our best interest and in the best interest of our employees and shareholders. Antitrust and unfair competition laws were developed and enacted to help preserve the free enterprise system by promoting healthy competition. We will comply in all respects with both the spirit and letter of these laws.

The antitrust and unfair competition laws prohibit business activities that constitute unreasonable restraints of trade, unfair trade practices and other anti-competitive activities. You should not participate in any activity which would serve to undermine the competitive nature of the industry or to artificially establish product prices independent of the market.

10.6 Corporate Funds

If you have control or use of any Bridgeman funds including cash or other valuables such as Corporate Credit Cards you are personally responsible for ensuring proper and appropriate use. Theft, carelessness and waste have a direct impact on our profitability. Any suspected incident of fraud or theft should be immediately reported for investigation.

10.7 Business Records

Accurate record-keeping is essential to meeting our financial reporting objectives and is required by law. All of Bridgeman funds, assets, commitments, receipts and disbursements must be properly and consistently recorded on our books in compliance with all applicable legal requirements or other applicable accounting standards and our system of accounting and internal control over financial reporting.

Records should always be retained or destroyed in accordance with our record retention policies and with appropriate authorisation. However, at times we may need to retain documents beyond the period they would normally be retained. The most common reasons are litigation or other legal matters.

11. Responsibilities

This Code does not constitute a comprehensive full or complete explanation of the laws which apply to Bridgeman and to you, and it does not contain all applicable policies. You have a continuing obligation to be familiar with applicable laws and all of our policies and procedures.

12. Reporting Breaches

You should report any behaviour or situation which you consider breaches or potentially breaches this Code. If you are concerned about a breach you should first refer to the appropriate policy and follow internal procedures for raising or reporting issues. You can also raise it with Chief Executive Officer, Managing Director or General Manager Bridgeman Building Group and General Manager Bridgeman Manufacturing.

If you are considering reporting instances of misconduct, you should remember that:

- Any report must be made in good faith – you must act honestly, at all times, and without malicious intent or ulterior motive;
- You are not entitled to commit an offence in the making of a report; and
- You must not make the report for personal gain.

13. Definitions

In this Code, the following terms have the corresponding meaning:

- **‘Board’** means the Board of Directors of Bridgeman.
- **‘Code’** means Code of Business Conduct and Ethics.
- **‘Confidential Information’** means information that the Company considers private and that is not common knowledge outside the Company.
- **‘Bridgeman’** and **‘Company’** means Bridgeman Agencies Pty Ltd T/A Bridgeman

14. Variations

Variations to this policy may only occur in exceptional circumstances where the work requirements or work environment are unique. Variations may be agreed, in advance, in writing with the Chief Executive Officer, General Manager of Bridgeman Building Group, General Manager of Bridgeman Manufacturing or Group HR Manager.

15. Further Information

For further information and/or clarification of matters referred to in this Code of Conduct and Ethics, please refer to the Chief Executive Officer, Managing Director or General Manager Bridgeman Building Group or General Manager Bridgeman Manufacturing.

Your sincerely,



Adam Sarota
Managing Director

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