

Policies	POL 28	 consolidatedgroup.com.au
CODE OF CONDUCT POLICY		

PURPOSE

This Code of Conduct sets out the standards of behaviour, ethics, and legal compliance expected of all directors, managers, employees, contractors, labour hire personnel, and suppliers of Consolidated Group of Companies, including all subsidiary entities (collectively referred to as *Consolidated Group*).

This Code applies to all work activities, whether performed on mining sites, construction sites, transport operations, offices, client premises, or remotely, and at all times when representing Consolidated Group.

As a minimum, Consolidated Group complies with all applicable Australian legislation, awards, regulations, and industry standards, including but not limited to:

- Work Health and Safety Act 2020 (WA) and WHS Regulations
- Occupational Safety and Health Act 1984 (WA) (where applicable)
- Mining Act 1978 (WA) and relevant mining regulations
- Work Health and Safety (Mines) Regulations
- Building and Construction Industry (Fair and Lawful Building Sites) requirements
- Road Traffic Act 1974 (WA) and Heavy Vehicle National Law (where applicable)
- Fair Work Act 2009 (Cth)
- Applicable Modern Awards, including:
 - Mining Industry Award
 - Building and Construction General On-site Award
 - Road Transport and Distribution Award
 - Clerks – Private Sector Award

This Code exists to protect:

- The safety and wellbeing of workers and the public
- The integrity and reputation of Consolidated Group
- The legal and commercial interests of the business

Failure to comply with this Code may result in disciplinary action, up to and including summary dismissal or termination of contract.

OBJECTIVES

Working Together

Consolidated Group is committed to maintaining lawful, respectful, and safe workplaces.

- **Health, Safety and Environment (HSE)**
All workers must comply with WHS laws, site rules, procedures, permits, and client requirements. Unsafe behaviour, failure to follow instructions, or wilful breaches of safety requirements will not be tolerated.
- **Equal Employment Opportunity**
We provide equal opportunity in employment and do not tolerate discrimination or unlawful conduct under the Fair Work Act or anti-discrimination legislation.
- **Bullying, Harassment and Sexual Harassment**
Consolidated Group maintains zero tolerance for bullying, harassment, victimisation, or offensive behaviour. Any conduct that creates a hostile, intimidating, or unsafe environment may result in immediate disciplinary action.

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Ethical Business Practices

All personnel must act honestly, ethically, and in the best interests of Consolidated Group.

- **Bribery and Corruption**
Bribery, facilitation payments, kickbacks, or corrupt conduct are strictly prohibited.
- **Gifts and Entertainment**
Gifts or hospitality must not influence, or appear to influence, business decisions. Any inappropriate or undisclosed benefit may be treated as misconduct.
- **Conflicts of Interest**
Actual or perceived conflicts of interest must be declared immediately. Failure to disclose conflicts may result in disciplinary action.
- **Insider Trading and Confidential Information**
Confidential or commercially sensitive information must not be misused or disclosed. Unauthorised disclosure is a serious breach.
- **Anti-Competitive Conduct**
Personnel must comply with competition and consumer laws and must not engage in collusion, price fixing, or unfair market practices.

Use of Assets, Systems and Information

- **Protection of Company Assets**
All equipment, vehicles, tools, data, intellectual property, and systems must be used lawfully, safely, and for legitimate business purposes only.
- **Financial Integrity and Record Keeping**
Accurate, honest, and complete records must be maintained at all times.
- **Use of Technology and Communications**
IT systems, mobile phones, vehicles, and social media must not be used in a way that:
 - Brings Consolidated Group into disrepute
 - Breaches confidentiality
 - Harasses or intimidates others
 - Violates client, site, or legislative requirements

Inappropriate online behaviour or public commentary linked to Consolidated Group may result in termination.

Engagement with Third Parties and the Public

- **Third-Party Relationships**
All dealings with clients, suppliers, regulators, Traditional Owners, and community stakeholders must be conducted with professionalism, respect, and integrity.
- **Media and Public Statements**
Only authorised personnel may speak on behalf of Consolidated Group. Unauthorised or misleading statements are prohibited.
- **Sponsorships and Donations**
All sponsorships and donations must be ethical, transparent, and approved in accordance with company procedures.

MISCONDUCT AND DISCIPLINARY ACTION

Any behaviour that:

- Breaches this Code

- Breaches legislation, awards, site rules, or client requirements
- Endangers safety
- Damages the reputation, commercial standing, or trust placed in Consolidated Group

may result in disciplinary action, including:

- Formal warnings
- Removal from site
- Suspension
- Termination of employment or contract
- Summary dismissal (where serious misconduct is established)

Nothing in this Code limits Consolidated Group's right to take immediate action to protect people, assets, clients, or the business.

RESPONSIBILITIES

- **Management**
Responsible for enforcing this Code, exercising due diligence, and ensuring compliance with all legal and contractual obligations.
- **Supervisors**
Responsible for implementing this Code in daily operations and addressing breaches promptly.
- **Employees, Contractors and Suppliers**
Responsible for understanding, complying with, and reporting breaches of this Code, legislation, or company procedures.

RELATED PROCEDURES

This Code is supported by, and must be read in conjunction with:

- WHSE Safety Management System – DOC-14
- Induction Manual – DOC-16
- Letters of Offer
- Employment and Contractor Agreements

COMMITMENT

This Code of Conduct applies to all Consolidated Group directors, management, employees, contractors, and suppliers and is a condition of engagement.

Approved



Theo Tsorvas

Director

Date 13.12.2025