Code of Business Conduct

The way we work.

JOHN HOLLAND

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Our Values

Caring
We care deeply about what we do and how it affects lives.

Empowering
We gain trust through action.

Imaginative
We push the boundaries.

Future-focused
We're in it for the long, long term.

01

What is the Code?

A framework for the way we do business.

Our Code helps guide our daily work and demonstrates how to practically apply our commitment to uphold proper and ethical business practices. We believe consistent and proper business conduct creates loyalty and trust with our stakeholders and each other and yields long-term business success.

More than following the rules, you are expected to think
Our Code goes further than following rules. It asks you to stop and think about what's right, to consider your options and to make good decisions that follow the spirit and intent of our Code.

Sometimes the Code asks for an even higher standard than the law
Of course, we must comply with applicable laws. However, if our Code requires a higher standard of behaviour than local laws, rules, customs or norms, the standards in our Code will apply.

Our Code is based on our values, policies, procedures and applicable laws, and is consistent with the China Communications Construction Company Ltd Code of Conduct.

Please note that personal work-related grievances, including allegations of bullying, harassment, and discrimination, are managed separately under the Workplace Behaviour Complaints Procedure, and the standards of behaviour in this respect are outlined in the John Holland People Policy, People Standard and Sex Discrimination & Sexual Harassment Policy.

Does the Code apply to you?

Our Code applies to all people who work for John Holland, as an employee, director, or officer; or people working under contract (where it is contractually required that they follow this Code), regardless of location or role (our people).

Where John Holland has a controlling position in a joint venture or other similar arrangement, we require that the standards of behaviour contained in our Code be adopted. We will also seek to work with suppliers, business partners and other third parties who operate under standards that are similar to our Code.

Suppliers must also comply with our Supplier Code of Conduct.



01

How do we put the Code into practice?

John Holland is committed to maintaining workplaces that are safe, respectful, inclusive and free from criminal and unlawful conduct. Our people must not participate in, facilitate, condone or ignore criminal or unlawful conduct and must report concerns through the appropriate reporting channels.

Our Code provides a framework within which to make the right decisions at work. We all have an important role to play in this framework. Our people must:

- Comply with our Code, our policies, procedures and the laws that apply to their work
- Seek to ensure that others who represent John Holland, including business partners, comply with our Code, relevant laws and our policies and procedures (where applicable)
- Where possible, influence our joint venture, consortium and alliance partners and seek to have them comply with standards consistent with our Code
- Seek to work with suppliers, business partners or other third parties who operate under standards similar to our Code
- Seek advice if there is any doubt as to the proper course of action
- Promptly raise known, or suspected, breaches of our Code, applicable laws, contractual obligations, or government requirements including suspected criminal or unlawful conduct.*
- Cooperate in investigations of possible breaches of our Code, including in relation to their own behaviour
- Not retaliate against another person for reporting actual, or suspected, breaches of our Code
- Demonstrate leadership and diligence to ensure compliance with our Code

Queries on the meaning of our Code, or concerns about actual or potential breaches, must be promptly raised (including under the Whistleblower Standard, if applicable). It may seem easier to keep silent, or look the other way, but our commitment to working according to our values means we must never ignore an issue that needs to be addressed.

**This includes matters that are required to be reported under the Victorian Government's Reporting Criminal and Unlawful Conduct on Public Construction Projects Policy where applicable.*

What are our responsibilities?

YOU	YOUR MANAGER	JOHN HOLLAND
Understand our Code **Apply** it to your decision-making	**Model** behaviour consistent with our Code **Explain** our Code to our people	**Lead** ethically **Educate** our people about our Code
Be alert to unacceptable behaviour **Think:** what can I do?	**Monitor** business practices **Ensure** awareness of and compliance with our Code	**Encourage** awareness and good decision-making **Review** compliance with our Code
Ask if in doubt **Speak up** about concerns or possible breaches	**Support** our people if they speak up **Respond** to legitimate concerns and questions raised	**Investigate** reports of unethical behaviour **Take action** if an issue is raised

What is the role of the John Holland Governance, Compliance & Audit Committee?

The Committee operates under an established Charter set by the Board of Directors. The Committee's responsibilities include:

- Monitoring the progress of investigations into breaches of our Code
- Determining appropriate action where serious or systemic breaches are substantiated
- Monitoring the implementation of such action, including referral to external responsible investigatory and enforcement authorities
- Identifying enhancements or modifications to the John Holland ethics and compliance framework, as appropriate

The Code will be reviewed and amended from time to time as approved by the Governance, Compliance & Audit Committee.

Although the Committee has broad oversight powers, it is not the direct point of contact for reports of known or reasonably suspected Code breaches. To ensure any such reports are handled efficiently and appropriately, follow the reporting procedure on page 6.

Decision-making: Your step-by-step guide

Our Code provides a decision making framework by establishing the principles and values that guide our actions and decisions. The aim is to promote an organisational culture that enables our people to respond appropriately to situations and be accountable for their decisions.

Step 1	Step 2	Step 3	Step 4
Define the issue – What is concerning about the situation? – Who else is involved and what is their perspective? – What effect does your behaviour have on the issue?	**Identify the underlying policies, principles and values** – How do our policies and procedures require you to behave? – If our Code does not deal with the issue, how do our values require you to behave?	**Consider your options** – What are the alternative options in this situation? – For each of those options, do they conflict with any aspect of our policies, principles or values? – How might they affect John Holland and our stakeholders, and what are the potential consequences?	**Make the right choice** – You need to be able to justify your actions and, in turn, be able to show that they are consistent with our policies, principles, values and our Code.

01

Not sure what to do – try the Quick Test

Try the quick test when making a decision:

- **Values:** Does it fit with our values?
- **Law:** Is it lawful and in line with our policies and procedures?
- **Feelings:** Would you be happy if you were treated this way?
- **Reasons:** Do you have all the information that is significant to the decision you are about to make and would you be confident explaining your actions to senior management or external authorities?
- **Reputation:** What would your family, colleagues or manager say about the decision you are about to make?
- **Media:** How would you feel if your decision was reported in the media?

How can you seek guidance on the application of the Code?

We encourage our people to seek guidance when they are in doubt about the proper course of action in a given situation. If you are unsure about any part of our Code, you can contact the National Advisory Service Employee Relations (**NASER**) via email, NASER@jhg.com.au or phone 1300 062 737, or Company Secretary via email, company.secretariat@jhg.com.au for guidance on the application of the Code and expected standards of behaviour.

For further training or support, Staff employees can access the online Code of Business Conduct training module via MyPlace on the intranet. Workforce employees can speak with their supervisor to request training on site.

How can you report breaches of the Code and other business conduct concerns?

We encourage anyone who wishes to report Business Misconduct (including breaches of the Code) to contact the Speak Up Line, the Company Secretary & Corporate Counsel or, for privacy-related issues, the Privacy Officer.

Speak Up Line

The Speak Up Line is an independent hotline service, operated by experienced staff who are specifically trained to receive and handle reports of Business Misconduct and whistleblower disclosures (contact details on the following page).

Company Secretary

The Company Secretary is responsible for the governance framework that supports compliance with our Code. They can be contacted at company.secretariat@jhg.com.au

Privacy Officer

The Privacy Officer oversees John Holland's privacy compliance framework and manages queries and concerns about the handling of personal information by John Holland. They (or their authorised delegate) can be contacted at privacy.officer@jhg.com.au.

John Holland is committed to the prompt reporting and appropriate management of criminal and unlawful conduct. Employees must report allegations or instances of criminal or unlawful conduct through approved reporting channels and comply with any applicable legal, contractual or regulatory reporting obligations. Employees are also required to preserve relevant evidence, maintain confidentiality and cooperate with internal and external investigations. Where specific government requirements apply, including the Victorian Government's Reporting Criminal and Unlawful Conduct on Public Construction Projects Policy, employees must comply with those requirements.

Does John Holland have a Whistleblower Policy?

Yes, our Whistleblower Standard is available on the Intranet and via the John Holland website. It contains important information for anyone who wishes to report a Business Misconduct issue relating to the John Holland Group.

The Whistleblower Standard includes information about how reports may be investigated and protections available to those who speak up.

Please note that personal work-related grievances are dealt with separately under the Workplace Behaviour Complaints Procedure, which is available on the Intranet. Where a business conduct issue does not amount to Business Misconduct this will also be dealt with separately under the Business Conduct Reporting Procedure.

Mandatory external reporting obligations may apply in certain circumstances.

John Holland Speak Up Line Contact Details

You can contact the John Holland Speak Up Line via the following:

- **For Australia:** 1800 775 126
- **For New Zealand:** 0800 788 612
- **For Singapore:** 800 616 7117
- **By email:** johnhollandspeakup@pkf.com.au
- **Website:** https://www.pkftalkintegrity.com/?jhg

When raising a concern via the John Holland Speak Up Line, ideally you should state:

- Your name (you can choose to remain anonymous when raising a concern; however, it is easier to investigate concerns and provide follow-up if you identify yourself)
- What part of the business you work for
- The nature of the issue
- Who is involved
- What steps you have taken, so far, to address the issue

Your confidentiality will be respected

When you report known or reasonably suspected Business Misconduct under the Whistleblower Standard, your identity will be disclosed only with your consent, or as otherwise permitted under applicable laws. The information you provide will be disclosed only on a 'need-to-know' basis in order to properly investigate the matter and address the concern.

You may choose to remain anonymous when raising a concern (in which case you should advise this at the time you raise your concern). However, it is easier to investigate concerns and provide follow-up if you identify yourself. Where you have chosen to remain anonymous, your identity will be kept confidential in accordance with applicable laws. Please note that in some circumstances, it may be reasonably necessary to disclose certain (de-identified) information to investigate the concern raised, or to obtain legal advice or representation in accordance with applicable laws. We may also be required by law to disclose information you have provided to us.

If you raise a genuine concern, you'll be supported

You do not have to be sure that the information you have is accurate in order to raise a concern, and you will not be penalised if a concern raised by you ultimately turns out to be incorrect if your disclosure was made with a reasonable belief or suspicion as to its contents. However, you must not make a report that is false or malicious. Disciplinary action up to and including termination of employment may be taken against anyone who makes a false or malicious complaint.

John Holland does not condone any form of retaliatory action being taken against anyone in connection with a Business Misconduct or business conduct concern which is raised with a reasonable belief or suspicion as to its substance.

Any instances of victimisation in response to Business Misconduct matters raised in accordance with the Whistleblower Standard should be promptly reported to the Company Secretary & Corporate Counsel or the Privacy Officer (as appropriate) or, in the case of a business conduct concern raised, to NASER. Reports of victimisation will be reviewed and investigated as appropriate. Victimisation (where substantiated) will be grounds for disciplinary action, including termination of employment. It may also attract severe civil or criminal penalties.

What happens if the Code is breached?

All reports of known or reasonably suspected Code breaches will be reviewed and addressed. This may involve investigating the reported matter. Where, following review or investigation, John Holland is satisfied that a breach of our Code has occurred, disciplinary action may be taken. This may include (where appropriate):

- A discussion with a manager and/or people representative about expected standards of behaviour
- An oral or written warning
- Counselling
- Change in duties
- Suspension or termination of employment
- Referral to external investigatory and enforcement authorities

Where a breach of our Code has occurred, the nature of any disciplinary or other action will be determined by the relevant supervisor, manager or Project HR (as appropriate) in consultation with the National Advisory Service Employee Relations team (NASER – naser@jhg.com.au or 1300 062 737).

Where can you find more information?

- Ethical Behaviour Policy
- Business Conduct Reporting Procedure
- Counselling and Disciplinary Procedure (Australia & New Zealand only)
- Whistleblower Standard
- Victorian Reporting Criminal and Unlawful Conduct on Public Construction Projects Policy

02

Ethical business practices

We do not condone any form of corruption. Our reputation gives our customers, investors, partners, supply chain and the communities we work in, the confidence to trust and do business with us. We do not engage in corrupt, illegal or unethical business practices.

I WILL...	I WILL NOT...
– Ask for advice if in doubt about a payment or gift I have been offered or wish to make – Immediately report any requests for bribes or facilitation payments as per the reporting procedure outlined on page 6 above – Immediately report any other concerns about bribery and corruption as per the reporting procedure outlined on page 6 above – Implement plans to prevent circumstances where bribery or corruption may occur – Record all financial transactions accurately	– Offer or give bribes including payments, gifts, favours or other benefits to gain an improper business advantage such as winning or keeping business, avoiding a penalty or accessing confidential information – Offer or make facilitation payments including where permitted under local law of my project or work – Accept or ask for money, gifts or anything of value offered in return for an improper business advantage – such as kick-backs or secret commissions – Ask a third party to do something John Holland is not permitted to do, unless legally allowed or required (eg. external audits or certifications) – Request a supplier or subcontractor to provide a private supply or service

We take care when offering or accepting gifts and hospitality.

The occasional gift or hospitality is acceptable when doing business as long as it's of modest value, is legal and in line with local business practice and John Holland's policies and procedures.

I WILL...	I WILL NOT...
– Ask myself if accepting a gift or hospitality may damage John Holland's reputation or place John Holland under some obligation – Be aware of, and comply with, John Holland's policies and procedures before giving or accepting gifts or hospitality – Ask my Manager or the Commercial Manager for my Business Unit/Project or the Company Secretary if I'm not sure whether something is appropriate or if I require approval under the Gifts and Hospitality Standard – Register the Gift using the online form: Gifts & Hospitality Notification Form	– Accept or offer gifts or hospitality that reward or encourage special treatment or are in exchange for business or business information – Accept or offer gifts of cash, loans or personal cheques – Accept or offer payments, benefits or discounts from business partners that are not available to all employees – Ask for a gift or hospitality – Accept or offer gifts or hospitality that are inappropriate, or which may give rise to an actual or perceived conflict of interest

We respect human rights and take a zero tolerance approach to modern slavery.

We respect the human rights and dignity of all employees, the communities in which we work and those who are affected by our projects and operations.

We take a zero tolerance approach to all forms of modern slavery. Specifically, we consider modern slavery to be a violation of fundamental human rights. Modern slavery includes eight types of serious exploitation, including human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour.

John Holland will ensure that its employees are paid and otherwise treated in accordance with their contracts of employment, applicable industrial instruments and modern awards and will ensure as best it can that its subcontractors and suppliers are compliant with applicable industrial codes of conduct.

I WILL...

- Report my concerns under the Whistleblower Standard if I become aware of what on reasonable grounds appears to be modern slavery in supply chains or in clients' or joint venture partners' supply chains
- Where it is my responsibility, I will make sure John Holland employees, clients, joint venture partners, subcontractors and suppliers agree to the Code requirements in relation to non-use of modern slavery

I WILL NOT...

- Knowingly engage in any way in the use, support or promotion of modern slavery within John Holland or its supply chains, or its business partners or their supply chains
- Ignore reasonable evidence of modern slavery within John Holland or its business partners on projects or within their supply chains



02

We only work with subcontractors and other third parties who share our approach to doing business.

We work with third parties that are reputable, competent and qualified, and who share our commitment to ethical business and management practices, safety and the environment.

I WILL...	I WILL NOT...
– Follow John Holland's due diligence procedures before engaging third parties – Ask my manager, or the Commercial manager for my Business Unit/Project or the Company Secretary if I am not sure how to engage a third party or if the due diligence identifies any concerns – Choose subcontractors and other third parties that are reputable, competent, qualified and will charge a reasonable amount for the service provided – Use a formal contract to engage third parties and make sure the authorised person on my project or in my Business Unit approves it – Make sure subcontractors and third parties understand and formally agree to our Subcontractor Code of Conduct	– Engage a third party that could create a conflict between my personal interests and those of John Holland. For example, engaging a third party in which I have an outside interest, or with which I am associated in some way – Ignore any improper behaviour from a third party – Direct a third party to deposit funds (in connection with a work-related transaction) into a personal or unauthorised bank account – Accept, make, request, or facilitate cash payments in connection with a work-related transaction, unless expressly authorised under an approved John Holland procedure

We avoid situations where our personal interests conflict with company interests.

We face a conflict of interest when personal and business interests compete, compromising our independence. We want to avoid these situations where possible, and manage them when they're unavoidable.

I WILL...	I WILL NOT...
– Ask myself if I have a conflict of interest because of my personal relationships, investments, organisations I belong to or other activities – Speak to my manager or the Company Secretary if I am unsure if my situation might be, or appear to be, a conflict of interest – Disclose any conflict of interest to my manager and the Company Secretary and complete a conflicts of interest form – Notify the Company Secretary of any required changes to the Conflicts of Interest Register maintained by them	– Be involved in decision-making if a conflicting interest may influence my ability to make an objective decision – Be directly involved in employing relatives, close friends or associates – Be involved in any business dealings or personal relationships which may create the appearance of a conflict of interest with my obligations to John Holland

We don't engage in insider trading.

Insider trading is the use of 'inside information' about a company, being information that's not available to the general public, to buy or sell securities. It's illegal in many regions where John Holland works and is not allowed under our policies.

I WILL...	I WILL NOT...
– Be careful when buying or selling securities in companies with which John Holland has a business relationship – When buying or selling securities of a material value in companies with which John Holland has a business relationship, report the transaction to my manager	– Use inside information to buy and sell securities and/or instruments in companies – Ask or encourage others to buy or sell securities/instruments using inside information – Give information to someone who may use it to trade in securities/ instruments

'Inside information' includes, for example, information about company contracts, financial performance against budget, proposed mergers, acquisitions or joint ventures.

We operate fairly and within competition laws.

We do not behave in a way that limits competition, takes unlawful advantage of others, or misleads them.

I WILL...	I WILL NOT...
– Understand and comply with the competition laws that apply to my business – Ask myself if my business or personal interactions with a competitor could be seen as anti-competitive – Report any concerns about anti-competitive behaviour to the Group General Counsel under the Competition and Consumer Trade Practices Compliance Procedure or under the reporting procedure outlined on page 6 of this Code, as appropriate	– Collude with competitors or other companies to fix prices, restrict production or supply of goods and services, allocate or divide customers, territories or suppliers or to rig bids – Coerce or threaten our business partners – Knowingly provide incorrect information, tell half-truths or allow competitors or partners to work under a misapprehension – Obstruct or hinder a competition authority's investigations

02

We are committed to trading lawfully across borders.

Most countries have laws and regulations about the import and export of goods and services. There are also international laws, bans, sanctions and restrictions on trade, investment and travel to and from particular countries. The consequences of breaking these laws, including unintentionally, are serious.

I WILL...	I WILL NOT...
– Follow national and international trade regulations and restrictions in the countries in which we work – Ask my manager or the responsible General Counsel if I'm not sure which trade regulations and restrictions apply – Provide complete and accurate information to government authorities	– Make trade or other business transactions if I am not sure it is legal or appropriate – Participate in or allow others, on John Holland's behalf, to participate in trade between a sanctioned country and the country that has put the trade sanctions in place

Where can you find more information?

- Ethical Behaviour Policy
- Travel and Credit Cards Procedure
- Gifts and Hospitality Standard
- Supplier Code of Conduct
- Procurement Policy
- Procurement and Subcontract Management Manual
- Managing Subcontractor Safety Procedure
- Authority Levels Procedure and Authority Levels and Business Controls Matrix
- Precontracts Manual
- Competition and Consumer Trade Practices Compliance Procedure (Australia Only)
- Whistleblower Standard

03 Community

We support local community groups and charities.

We contribute to the communities we work in by sponsoring and donating to approved local community groups and charities which are legal, ethical and improve the quality of life in a sustainable way.

I WILL...

- Only consider potential sponsorships and charitable donations which comply with local laws and John Holland's procedures
- Always get approval before committing to a sponsorship or a charitable donation

I WILL NOT...

- Commit to a sponsorship or donation that is illegal or doesn't meet John Holland's ethical standards

Where can you find more information?

- Community Partnerships Handbook



04 Government & media relations

We foster open and honest relationships with governments. Wherever we work, our business is affected by decisions made by government. So it's important we respect government authority and build open and constructive relationships with them.

I WILL...	I WILL NOT...
– Follow John Holland's procedures regarding who is allowed to communicate with governments, regulators and public authorities – Ensure that all information provided to governments, regulators and public authorities is accurate and appropriate – Cooperate with every legitimate government request for information in accordance with tendering or contractual obligations, or with regulatory investigations, while protecting the Company's legal rights – Immediately report to the responsible General Counsel for my region any regulatory investigations involving John Holland – Promptly cooperate with lawful regulators and authorities in relation to reports or investigations concerning criminal or unlawful conduct	– Have dealings with governments and public authorities that are unethical or illegal – Participate in, facilitiate, encourage or ignore criminal or unlawful conduct in connection with any John Holland project or workplace



We always communicate information about John Holland accurately and through authorised spokespeople.

We have to disclose certain information to regulators and other third parties. From time to time we also provide information to the media. Information must always be accurate and be provided only by authorised spokespeople.

I WILL...	I WILL NOT...

– Ensure any information I am required to provide, on behalf of John Holland, to:
  ○ a regulator - is approved by the most senior manager in my Business Unit and the responsible legal counsel; or
  ○ the media - is approved by the most senior manager in my Business Unit and Customer & Corporate Affairs
	– Make public disclosures if I'm not authorised to do so
	– Disclose inappropriate or inconsistent information that may damage the reputation of John Holland
	– Mislead or deceive others in John Holland communications

External communication includes documents required by law or regulation such as annual reports. It also includes business briefings, news releases, interviews, speeches, reports, articles, information on John Holland's website and social media.

We will not make political contributions.

Everyone has the right to participate in the political process, but to maintain our independence and integrity in the markets we work in, political contributions and activities must be kept strictly personal and separate from John Holland.

In some Australian jurisdictions, officers of John Holland are specifically prohibited from making political donations.

John Holland does not make direct or indirect contributions, donations, in cash or in-kind to, or fund raising for, any political party.

I WILL...	I WILL NOT...
– Ensure that any involvement on behalf of John Holland in political events or activities has been properly approved and is for policy dialogue and business briefing purposes only – Ensure that any such events attended are notified to the Customer & Corporate Affairs team so any required disclosure can be made – Obtain approval from my manager if I run for public office and apply for leave if carrying out the duties of public office during normal working hours – Make it clear that my opinions and any personal donations I make don't represent John Holland	– Make contributions on behalf of John Holland to political parties, politicians, officials or candidates for public office at any level of government including local government – Be involved in political activities that damage or create a conflict of interest with John Holland or prevent me from doing my job – Be involved with prohibited political groups or activities, or make prohibited political contributions

Where can you find more information?

- Community & Stakeholder Engagement Manual
- Community Partnerships Handbook
- Corporate Communications Manual
- Federal Government Interaction Standard

05

Use of John Holland's assets & resources

We respect and protect John Holland's assets and resources. Our assets are an important part of our business. They include our facilities and equipment, materials and supplies, computer and telephone networks. They also include intellectual property – our ideas and know-how, customer and supplier information, and market data.

I WILL...	I WILL NOT...
– Use company property and resources only for work-related purposes, unless reasonable personal use is approved or allowed under relevant policies – Keep company assets safe and protect them from being lost, misused, stolen or damaged – Store all confidential information securely – Make sure contractors and third parties understand and follow John Holland's procedures when using company assets – Promptly report misuse or theft of company assets	– Defraud John Holland, for example, by falsely claiming expenses that were not incurred for approved business purposes – Misuse company funds, for example, by asking subcontractors to do work for me privately and charging this to John Holland – Knowingly damage or misappropriate the assets of others (including physical and intellectual property) – Allow unauthorised people to access our facilities or use our assets – Disclose confidential information (including intellectual property) without proper authorisation or approval – Publish, discuss in public or disclose to unauthorised parties any commercially confidential information and proprietary information belonging to John Holland or any subcontractors, suppliers, business partners and other third parties



We accurately report and disclose transactions.

All information created and maintained as a result of our business activities must accurately reflect the underlying transactions and events.

John Holland will comply with applicable laws and regulations in relation to business reporting in each jurisdiction in which it operates. This involves: properly authorising transactions; accurately and completely recording transactions in the relevant accounts; and retaining and disposing of our data in accordance with applicable laws.

Our senior financial officers and others responsible for the accuracy of financial reporting have an additional responsibility to ensure that adequate internal controls are in place to achieve truthful, accurate, complete, consistent, timely and understandable financial and management reports.

I WILL...	I WILL NOT...
– Follow the reporting standards and processes applicable to my Business Unit – Immediately report any concerns I have regarding the validity of any reporting process or record-keeping activity – Immediately report the matter (as per the reporting procedure set out on page 6 of this Code) if I believe I am being asked to create false or misleading information	– Falsify, conceal, alter, or otherwise tamper with information, or create misleading information. Such conduct may constitute fraud, and may result in civil or criminal liability for me and for John Holland – Misrepresent financial transactions or any other transactions or events, as this may constitute falsification of Company records and/or fraud – Destroy, deface, or make unrecoverable documents that are, or are likely to be, the subject of litigation or any regulatory investigation

05

We use John Holland's information and communications systems for business purposes.

Our information and communications systems and the information they contain are valuable business assets. That's why it's important we use them properly and don't use them in ways that may affect their operation or compromise the information stored in them. Reasonable use of these for non-work purposes is acceptable.

To the extent permitted by law, John Holland may monitor or audit use of its information and communications technology (IT) and to access, review and disclose data stored on its systems. These activities may be undertaken for: maintenance; to meet business needs; during an investigation of suspected or reported breaches of policies, procedures or the law; or to meet a legal or policy requirement.

John Holland's IT includes all computer equipment, servers and networks, storage devices, telephones, software, applications, and information owned or used by John Holland. It also covers the use of computer accounts, mobile devices, internet access, email, voice mail, social media, video conferencing and remote access.

I WILL...

- Always follow John Holland's policies and procedures when using John Holland's IT and systems
- Ensure I have read, and am familiar with, the Information Security Manual

I WILL NOT...

- Use John Holland's IT for excessive personal use
- Use John Holland's IT for unlawful or unapproved activities (including bullying, harassment, vilification, discrimination or making statements prejudicial to John Holland's interests)
- Use John Holland's IT, including its communications systems, to access, download, create or distribute content that is illegal, offensive or damaging to John Holland
- Use unapproved systems or technology for business purposes



Where can you find more information?

- Quality Policy
- Risk Management Policy
- Motor Vehicle Benefits Procedure
- Information Security Manual
- IT Corporate Manual
- Workplace Surveillance Procedure (Australia Only)
- Recording, Filming and Photography Procedure (Victoria only)
- Business Conduct Reporting Procedure

06

Personal information & privacy

We respect the privacy of others.

We will only collect such personal information as necessary for business purposes. We will protect this personal information, and disclose it only for the purpose for which it was collected (unless we have permission to do otherwise, or as required by law).

"Personal information" means information (including opinions) about an identified individual, or an individual who is reasonably identifiable.

I WILL...	I WILL NOT...
– Respect people's personal information and keep it private – Comply with privacy laws if I need to collect, handle or disclose personal information – Seek guidance from the Privacy Officer, responsible General Counsel or NASER if I am unsure about my obligations	– Collect or use other people's personal information if it is not necessary for business purposes – Collect or use personal information in an unlawful way – Collect or disclose sensitive personal information without the relevant person's consent, unless required by law

Where can you find more information?

- Information Security Manual
- IT Corporate Manual
- Workplace Surveillance Procedure (Australia Only)
- Recording, Filming and Photography Procedure (Victoria only)
- Privacy of Personal Information Procedure (Australia Only)
- Privacy of Personal Data Procedure – Singapore (Singapore Only)
- Victorian Criminal and Unlawful Conduct on Victorian Public Construction Projects Policy

Further guidance

If you have followed the guidance set out in our Code and require further assistance, you can speak to NASER regarding the application of the Code, or the Speak Up Line, Company Secretary or the Privacy Officer to report a known or reasonably suspected breach of the Code. Contact details are set out on page 6.

johnholland.com.au

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