



CODE OF BUSINESS & ETHICS CONDUCT

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1 CODE OF CONDUCT APPLICATION

China Railway Engineering Equipment (Australia) Pty Ltd (CREGA) is committed to conducting its business and affairs with honesty, integrity and in accordance with high ethical and legal standards.

This Code is designed to promote integrity and prevent misconduct. It provides an overview of CREGA's expectations of its employees and parties with whom it deals, and is supplemented by other current CREGA policies. Violations and deviations from this policy are considered violations and deviations from this Code.

All employees, contractors, members, volunteers and interns must comply and conduct themselves in accordance with this Code, as well as any relevant legislation that applies to CREGA and its operations. This Code applies to all CREGA approved workplaces (including home based workplaces) and any CREGA run events and functions. This Code also applies to Board Members.

2 CODE INTERPRETATION & APPROACH

The Code establishes behavioural expectations and guiding principles for everyone to act with fairness, honesty, integrity and openness. We are committed to treating people with respect, equality and dignity, regardless of race, national or ethnic origin, colour, religion, age, gender, sexual orientation, marital status, marital status, disability or a pardoned conviction granted or a record suspended.

All employees are expected to do their job to the best of their ability; use Company assets as intended; protect sensitive and confidential information; fulfil obligations in accordance with all applicable laws and Company policies, procedures and rules; and live and exemplify the safety and health culture.

All are expected to support and reflect the values of CREGA in all public interactions and engage in behaviour consistent with our values.

This Code is not a complete guide to every legal or ethical issue that may arise in the performance of one's duties, and all must also consider the other Company policies and procedures that may apply to the specific situation. Questions about how this Code applies to specific situations, or whether a specific action conforms to this Code, are welcome.

Honesty and common sense are the best guides in determining whether or not an action conforms to this Code, and everyone is expected to exercise good judgment, maintain high ethical standards and consider CREGA values in conducting business activities .

When in doubt, employees should speak to their manager and also do a self-check by asking themselves the following questions, as guidance for their planned actions:

- Does the person or business being engaged share the same ethical and honest values?
- Does or will the action under consideration reflect the intent and purpose of this Code and applicable laws, even in hindsight?
- Is or would most people consider the action appropriate, ethical and honest, and would anyone feel comfortable defending it in front of others?
- From an ethical and honesty point of view is the action considered appropriate?

If the answer to any of these questions is no, then the proposed action should not be taken without further guidance. If the question remains unanswered after an interview with a senior member of CREGA, consult the CREGA management or one of the directors.

CREGA is committed to a high level of integrity and ethical standards across the entire organisation. There are serious consequences for individuals and the organisation where violations of laws have occurred. The organisation's policies and procedures and the Code are designed to help achieve compliance.

3 COMPLIANCE WITH THIS CODE & UPHOLDING OUR VALUES

It is expected that we will behave in a manner that is consistent with our organisational values. This means that CREGA expects all representative's of CREGA to:

- Treat everyone with whom they interact with professionalism, respect and courtesy and maintain the organisations good reputation;
- Refrain from bullying, harassing, racist behaviour or discriminating against others.
- Perform their role to the best of their abilities, and be aligned to the organisation's vision and values;
- Not make any untruthful or disparaging remarks about CREGA or others with whom they interact;
- Provide others with equal opportunity and respect;
- Not participate in any activities that put themselves or others at risk;
- Learn about and follow all relevant CREGA policies and procedures and all relevant laws that are applicable to your role, and follow any changes or updates to these policies and procedures and relevant laws, including when working from home;
- Act with integrity and fairness when dealing with both internal and external suppliers, contractors and other parties;
- Not knowingly participate in any illegal or unethical activity that would conflict with CREGA's organisational interests;
- Disclose any conflict or potential conflict of interests;
- Report any actual, potential or suspected breaches of this Code, and encourage others to do the same.

This applies to all work and work related social situations both within normal working hours and after hours, and includes any activity online or on social media.

All breaches of this Code will be investigated and any individual found to have breached this Code may face disciplinary action up to and including termination of employment/engagement with CREGA.

4 DIVERSITY AND INCLUSION

CREGA is on a journey to become a more inclusive, diverse, representative, culturally competent and anti-racist company. We aspire to be a truly diverse and inclusive and so that we can be more effective.

We are committed to ensuring that our people feel respected, valued, heard and seen. Everyone engaged with CREGA has an obligation to ensure that they embody and implement the principles set out in our Diversity, Inclusion and Wellbeing Plan including creating;

- a strong diversity, inclusion and wellbeing organisational infrastructure
- a diverse, inclusive, representative and culturally competent movement
- a safe and healthy movement that prioritises mental health and wellbeing

5 DISCRIMINATION, RACISM, BULLYING, HARASSMENT AND VICTIMISATION

It is CREGA's aim to provide a workplace that is free from all forms of discrimination, racism, bullying, harassment and victimisation and where everyone feels valued for their unique contribution. It is expected that we will treat others with respect and dignity at all times and welcome different perspectives into our organisation.

No individual should be subject to discrimination on the basis of (not limited to);

- age,
- gender identity,
- race, ethnicity, country of origin,
- parent and/or carer status,
- immigration status,
- sexual orientation,
- religious beliefs,
- relationship status,
- pregnancy,
- breastfeeding,
- physical abilities and
- physical appearance.

CREGA does not tolerate any inappropriate workplace behaviour that risks the health and safety of others. This includes discrimination, racism, bullying, harassment, sexual harassment and victimisation as well as any form/s of physical or psychological violence or harm, including micro-aggressions. CREGA will investigate any allegations of inappropriate workplace behaviour in a prompt and culturally appropriate manner and will take appropriate corrective action. CREGA does not tolerate any retaliatory behaviour against individuals who raise a complaint of discrimination, racism, bullying, harassment, sexual harassment or victimisation in the workplace.

6 HEALTH, SAFETY & WELLBEING

The health, safety and welfare of CREGA employees, contractors, volunteers, members and activists at CREGA offices and events, as well as visitors to CREGA's premises, is of the utmost importance to CREGA.

CREGA aims to create and maintain a safe and healthy work environment complying with all relevant Work/Occupational Health and Safety (WHS) Acts ("WHS Acts") and Regulations in all States and Territories in which CREGA operates.

It is expected that individuals will not participate in any activities that put themselves or others at risk. This relates to both physical and psychological health, safety and wellbeing. CREGA also expects that any breaches to health, safety & wellbeing are addressed immediately and reported as appropriate. Employees and Board Members are also expected to complete all compulsory training that outlines their obligations and reporting responsibilities. All incidents will be investigated promptly and corrective action taken. Individuals found to have breached health, safety & wellbeing compliance may face disciplinary action up to and including termination of employment/engagement.

7 CONFIDENTIALITY AND PRIVACY

CREGA is committed to protecting and maintaining the privacy of all employees, contractors, volunteers, members and individuals and companies with which we deal, and to maintain the confidentiality of the personal, business and sensitive information we hold about them. CREGA is bound by various pieces of legislation relating to privacy, some of which impose specific obligations when it comes to handling information.

CREGA will not tolerate any unauthorised disclosure or use of proprietary or confidential information. This applies when working for/with CREGA and also when the employment/relationship with CREGA ends.

8 INTELLECTUAL PROPERTY

All of CREGA information, copyrights and trademarks are to be used in a manner that will safeguard them as assets of the organisation. Additionally there must not be any misappropriation or infringement of information, trademarks or copyrighted works of others.

9 ORGANISATIONS PROPERTY

Protection and proper use of CREGA property is vital to our organisation. CREGA property should not be used for personal benefit or any other improper purpose. This includes accessing any inappropriate websites, conducting other business activities using CREGA sites and/or equipment, selling, loaning or giving away CREGA property, unless otherwise authorised to do so.

Any theft, misappropriation or fraud will not be tolerated and may result in disciplinary action up to and including termination of employment/engagement and where appropriate a referral to police.

10 CONFLICT OF INTEREST

A conflict of interest is where you are in a position to make or influence a decision within the organisation which may benefit you or a related third party such as a partner, relative, business or associate. It is important that you avoid any situations that may involve a conflict, or the appearance of a conflict of interest. It is expected that all employees, contractors, members and Board members will act in the best interest of the organisation at all times and to the exclusion of personal advantage. All actual, perceived or potential conflicts of interest must be disclosed to CREGA immediately.

11 ANTI-BRIBERY AND GIFTS

CREGA is committed to ensuring our working relationships are maintained by high standards of ethics and integrity. Offering, giving, soliciting or receiving any form of bribe or incentive payment is prohibited and is especially strict when suppliers are involved. It is never acceptable to give or receive a personal gift in cash or cash equivalent. If you do receive a personal gift resulting from your work with CREGA, you must disclose this to your manager/supervisor immediately.

12 WHISTLEBLOWER PROTECTION

CREGA is committed to ensuring that individuals are not disadvantaged or discriminated against for reporting unacceptable behaviour in good faith.

13 REPORTING UNACCEPTABLE WORKPLACE BEHAVIOUR

If you believe that someone has behaved inappropriately in the workplace (or at a work related event), or has breached or may potentially be in breach of this Code, policies and/or relevant laws, CREGA encourages you to raise your concerns with your manager/supervisor/ CREGA representative. If the concern involves your manager/supervisor, and you would prefer not to speak with them, employees should contact the People and Culture team and all other individuals should contact the CREGA Complaints Officer. All reports will be handled in a sensitive and impartial manner as outlined in [insert policy] for employees.

CREGA encourages internal resolution of grievances. However, after you have made your manager aware of your grievance, you may take your case to the relevant authority, which may include the Police, Fair Work Commission, Human Rights Commission and other equal opportunity agencies in your state or territory.

CREGA will not tolerate any retaliatory action or victimisation taken against individuals who raise a complaint. If however, a false complaint is made, an individual may be subject to disciplinary action, up to and including termination of their employment/engagement.

14 CONSEQUENCES OF UNACCEPTABLE WORKPLACE BEHAVIOUR

Behaviour that is considered inconsistent with this Code, policies and/or relevant laws will be investigated. Depending on the findings of any investigation, appropriate actions will be taken which may range from coaching to termination of employment/engagement without notice.

CREGA considers the following examples of unacceptable workplace behaviour (not limited to) are likely to result in termination of employment/engagement:-

- Serious bullying, racist behaviour, harassment, sexual harassment, victimisation or discrimination;
- Serious safety breaches, including physical or psychological violence or threats of violence;
- Serious breaches of CREGA policies, procedures and/or relevant laws;
- Defrauding CREGA;
- Wilful damage of CREGA's property.

For further information regarding this Code and your obligations in relation to this Code, please discuss with your manager/supervisor or the People & Culture team.