

Code of Conduct

www.pacificnational.com.au



Overview



Pacific National's Vision is to be Australia's most trusted and respected logistics partner. We deliver what matters – for our people, customers, and shareholders, and we care more.

We believe the key to realising our Vision lies in consistently demonstrating honesty, integrity, and respect, while prioritising ethical and responsible decision-making in all aspects of our business operations.

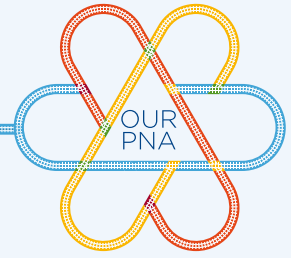
To do this we have developed our Code of Conduct (**Our Code**). Our Code builds on our Pacific National Approach (**PNA**), underpinned by our Values and Priorities, and outlines how we do business.

Our Code sets the **standards of behaviour we expect** of all employees, officers and directors and any contractors and consultants who perform work for Pacific National. It also reflects the expectations of our customers, suppliers, investors, regulators, and the community.

This Code applies universally across all of Pacific National. It is not limited to the workplace or specific working hours but extends to various settings, including, but not limited to, customers, and supplier sites, work functions, online platforms, and any instances where you represent Pacific National, such as when wearing our company uniform or attire.

Our Code of Conduct has the full support of the Board and Executive Leadership Team. By living our PNA and upholding Our Code, we can all make Pacific National an amazing place to work.

Paul Scurrah
Chief Executive Officer



Our Commitment

Our Code reflects the behavioural and ethical expectations for how we engage with others, and how others engage with us – to deliver what matters.

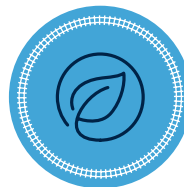
At Pacific National, we are committed to:



Safety above all else

Having a safe workplace, both physically and emotionally, in which any form of harassment, discrimination, bullying, or victimisation is unacceptable.

Above all else, safety is our number one priority.



Operating sustainably

Our business operates with a focus on sustainability, making positive economic, social and environment contributions to our people, customers, and shareholders across the communities in which we operate.



Inspiring our people

We strive to empower and inspire our employees to perform at their best and to **embrace our core Values**.



Compliance with laws and regulations

We strictly adhere to all applicable laws, regulations, obligations, policies, and standards.



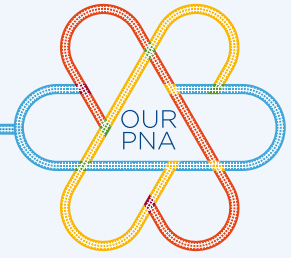
Embracing inclusivity

Creating an **inclusive environment** where everyone is valued and has a role to play in delivering what matters.



Honesty and integrity

We conduct ourselves with honesty and integrity in all our dealings. We actively avoid conflicts of interest and inappropriate business practices.



Protecting our people, assets, and reputation

We are committed to safeguarding our people, assets, systems, data, information and reputation of Pacific National.



Upholding Our Code

We diligently uphold Our Code by thoroughly investigating, addressing, and appropriately reporting suspected breaches.

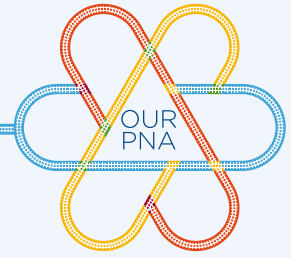


Speaking up

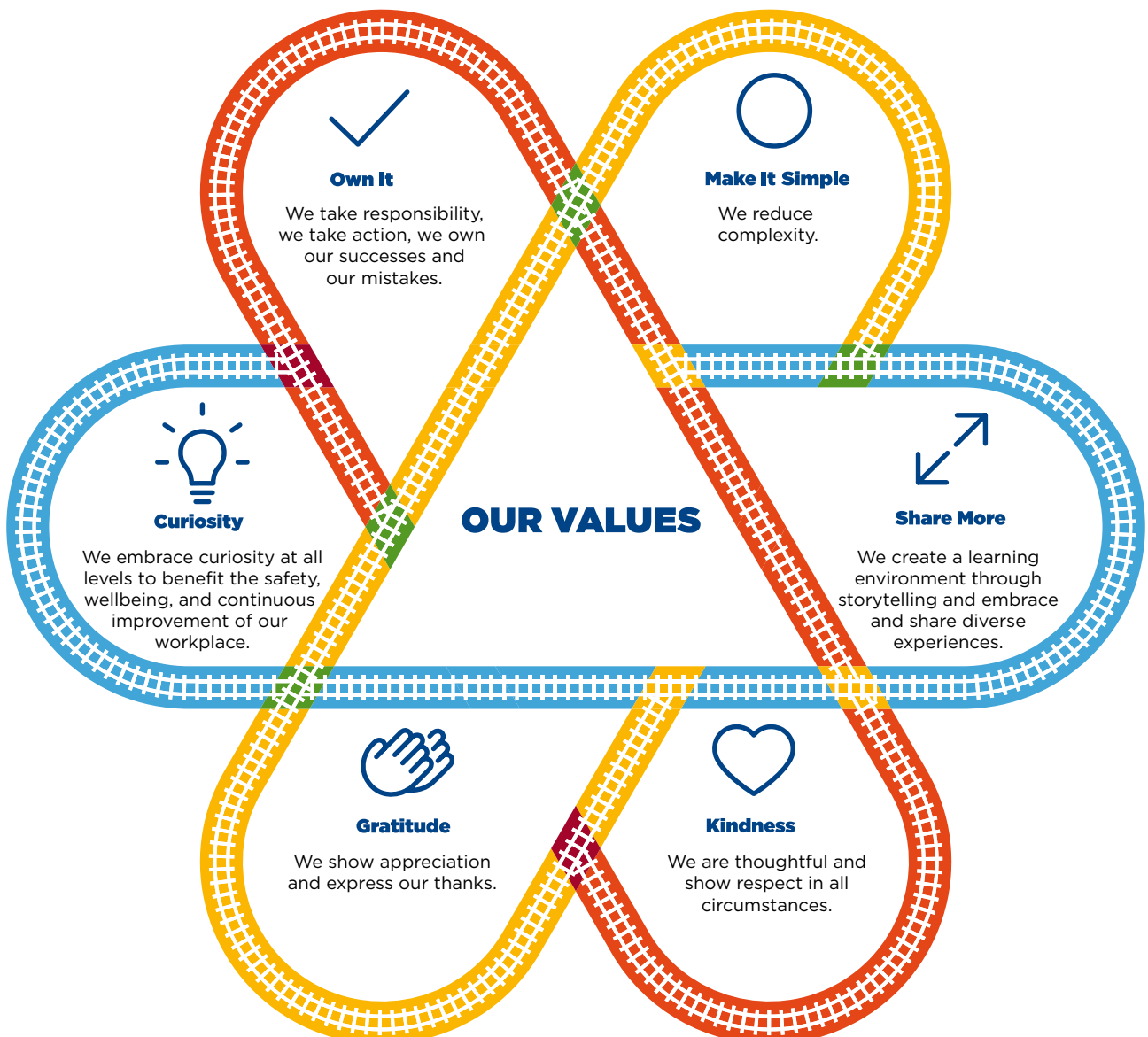
We ensure that you can **speak up** by safely raising concerns in connection with our workplace.

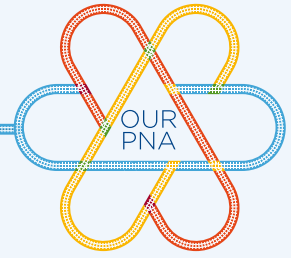
We will not tolerate breaches of Our Code, or any form of victimisation, reprisals, or adverse treatment against you, if you raise an issue or complaint in relation to Our Code.





Our Values





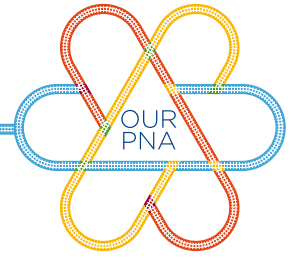
Our Approach

Aligned to our Priorities of Safety, People and Leadership, Customer, Community and Financial Success, and underpinned by our Values of Make it Simple, Share More, Kindness, Gratitude, Curiosity, and Own It, the expected standards of behaviour of Our Code are set out below and within our company policies.

What it means for you

You are expected to use Our Code and these standards to help you understand what is expected of you and to lead by example by living by our Values.

- ✓ You must read, understand, and **comply with Our Code** and all our policies, procedures, and guidelines relevant to your role and the work you undertake at Pacific National.
- ✓ Our Code is not all encompassing and does not deal with every situation which may arise. It outlines the minimum standards expected of you, and should help you decide what is right. **If in doubt, Ask!**
- ✓ You should understand that failure to act in accordance with Our Code, or our policies and procedures, may result in **disciplinary action**, up to and including termination of employment or contract of services.
- ✓ **Take positive and appropriate action to report matters.** You can raise concerns safely in connection with our workplace, with a positive obligation to report breaches of Our Code or any laws.

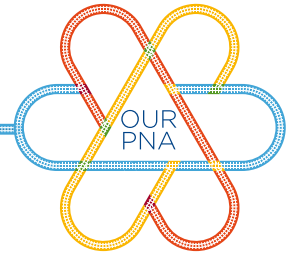


Safety

Above all else. Home safely every day.



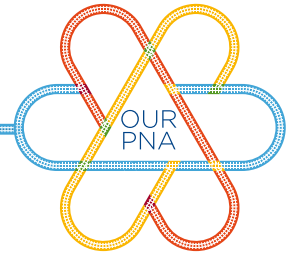
- We behave in a way that demonstrates commitment to the safety of everyone we work with. This care extends to the people we work with, our customers, and community.
- We work in a safe manner, following and applying all health, safety and environmental policies and procedures, requirements, and reasonable directions.
- We immediately report any safety hazards, unsafe conditions, or incidents that have involved unsafe conduct or a safety breach.
- We present fit and able to safely perform our duties.
- We don't ignore unacceptable behaviour. We lead by example, and stop, and speak up about concerns with care.



People & Leadership

Inspiring people, leadership excellence and a respectful culture.

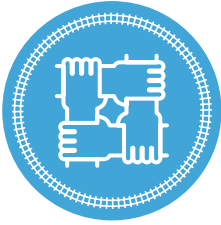
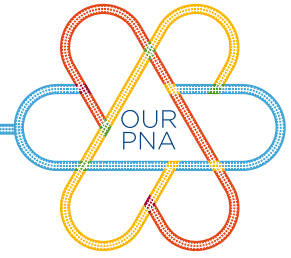
- We behave in a way that is inclusive and recognises every person has a role to play and respects the value and diversity of our teams. Our people embrace collaboration and curiosity.
- We comply with the law, company policies and directions.
- We demonstrate Our Values and Our Code through our behaviours.
- Our leaders promote a workplace that fosters Our PNA and Our Code.
- We demonstrate dedication and a strong sense of ownership by taking pride in our work and maintaining a positive attitude.
- We do not engage in behaviour which might bring the Company into disrepute or otherwise adversely affect its brand or reputation.
- We treat all people fairly, respectfully, courteously and with dignity, to create an inclusive and kind environment.
- We do not engage or support behaviour that constitutes harassment, discrimination, bullying, or victimisation.
- We act appropriately and professionally in the workplace and when representing the company.
- We are honest and cooperative.
- We do not make complaints that are malicious, false or in retaliation.
- We immediately notify of any matters which may impact our ability to undertake (in part or all of) the inherent requirements of our role or engagement, such as health, family/ living status, or charged with or convicted of a criminal offence. Disclosure is required of serious criminal offences, whether or not related to work.



Customers

Innovating and succeeding together.

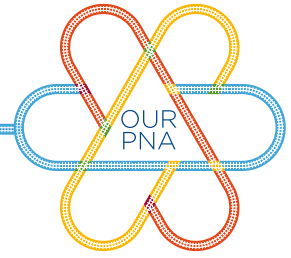
- We behave in a way that is reflective of our customer focus – meeting the needs of our people, customers, and shareholders. Our conduct fosters authentic, trusting, and ethical relationships, co-creating value for all.
- We behave in a professional manner that fosters trust, confidence, and goodwill in colleagues, customers, suppliers, and the community.
- We keep all customer information confidential unless authorised.
- We keep our commercial sensitive information confidential.
- We compete vigorously but fairly, and in accordance with the law.
- We act ethically, honestly and with integrity in all our dealings.
- We do not use company assets or our position to gain personal advantage.
- We do not discuss, make, or attempt to make arrangements with Pacific National's competitors in contravention of the law.



Community

Enhancing and caring for the communities we operate in and through.

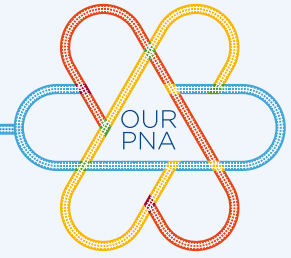
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- We behave in a way that reflects our sustainable, economic, social, and environmental contributions in the communities in which we operate.
 - We manage and minimise the risk of modern slavery in our operations and supply chain.
 - We only make authorised public statements, if authorised to do so by our manager or the Communications team.
 - When using social media either personally or for work purposes, we do not publish content that has the potential to cause damage to Pacific National's business (including but not limited to its reputation, its employees, customers, or suppliers).
 - We do not expose or share confidential information.



Financial Success

Controlling our destiny and earning the right to grow.

- We behave in a way that is respectful of our people, shareholder investment and financial diligence. We adhere to high ethical and legal standards, and safeguard and appropriately use Pacific National's assets (both physical and non-physical).
- We respect and protect our people, assets, information, data, and reputation.
- We prevent non-authorised persons from accessing Company facilities, data, or equipment, protect Company assets from waste, damage, or misuse, comply with all security procedures applicable to the workplace or our equipment, and report data security breaches immediately.
- We understand and act within our delegated authority.
- We do not buy or sell shares if we have any 'inside information'.
- We do not engage in misleading or deceptive conduct.
- We disclose all conflicts of interest, which includes any scenario where one's own personal circumstances or dealings might affect, have the potential to affect, or might create an appearance of affecting one's judgment or impartiality in their position within the Company. This includes holding personal relationships with another person within the workplace or a customer or supplier.
- We only provide or receive entertainment benefits or gifts that are lawful and which have been authorised. You must seek approval from your manager (for CEO or Directors, approval by the Chairperson) before giving or accepting any gift or other benefit that is \$200 or more in value or which could affect our impartiality or how we make decisions or perform our duties and responsibilities. Any value when giving or receiving gifts to Government Officials must be approved by the Company Secretary. We do not offer or accept such gifts or benefits without this prior approval.



Reporting Matters

Action to report matters

How to speak up

You can raise concerns safely in connection with our workplace, with a positive obligation to report breaches of Our Code or any laws.

There are several ways you can report concerns about conduct at Pacific National. These include:

- For breaches of Our Code, Our Policies, Our Standards
 - Contact your direct supervisor/manager
 - Contact People and Culture
 - Contact any senior leader (Head of) or Executive
- For potential/suspected breaches of the law, regulations, obligations or if you do not feel comfortable reporting through the recommended channels, you can contact our external service, the confidential hotline (STOPline).

How to contact the STOPline

By telephone (no caller id):

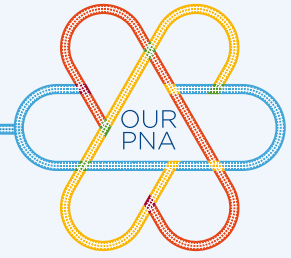
1300 304 550

By mail:

**Pacific National Pty Ltd
c/o STOPline,
Locked Bag 8,
Hawthorn, VIC 3122**

By confidential email:

pacificnational@stopline.com.au



Related Policies

You should familiarise yourself with, understand and comply with all Pacific National policies and procedures at all times. This includes completing training and familiarisation relevant to your role to build and maintain awareness of relevant laws, obligations, policies, procedures, and practices affecting what you do, and how you do it.

Below are some of the key policies and procedures underlying Our Code. You can consult these policies for further information and details about our expectations of each other.

Safety	People & Leadership	Customers & Community	Financial Success
<ul style="list-style-type: none">• Health and Safety• Drug and Alcohol	<ul style="list-style-type: none">• Inclusion and Diversity• Respect at PN• Whistleblower• Speak Up	<ul style="list-style-type: none">• Social Media• Privacy Framework• Supplier Code of Conduct	<ul style="list-style-type: none">• Compliance Management Framework• Procurement• Fraud and Corruption Prevention• Delegations of Authority Framework• Conflicts of Interest• Mobile Telecommunications• IT Security and Acceptable Use• Cyber Security Incident Response

Our Code and all policies and procedures, together with others that apply to our business at Pacific National, are available and up to date on **The Junction**.

If you have any questions on Our Code, or require further information, please contact the People & Culture team by email at humanresources@pacificnational.com.au.



Contact us



02 8484 8000



www.pacificnational.com.au



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[linkedin.com/company/pacific-national](https://www.linkedin.com/company/pacific-national)