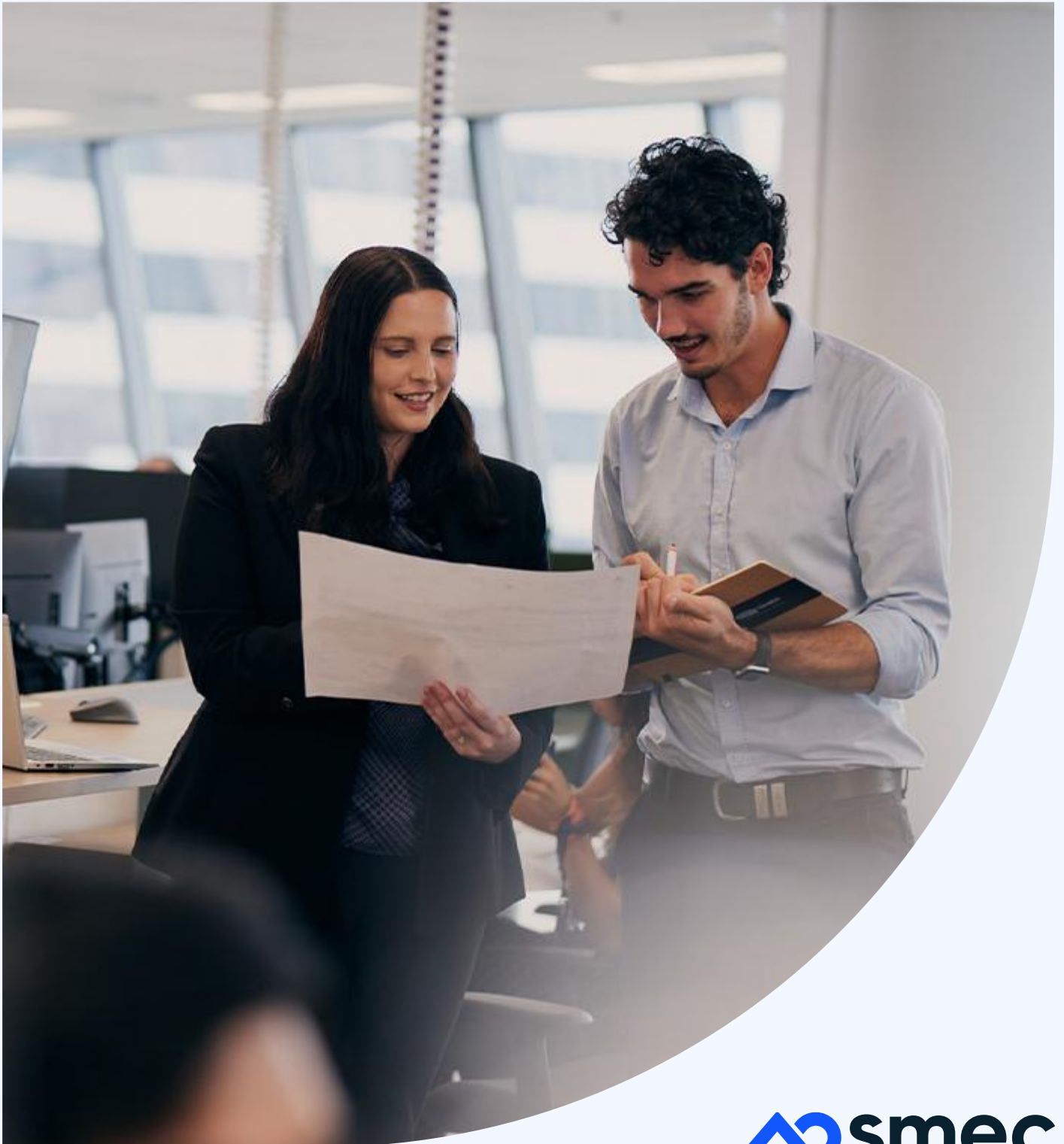


SMEC Policy

Code of Conduct

15 September 2025



Purpose

SMEC's Code of Conduct establishes a common understanding of the standards of behaviour expected of all SMEC Group Employees in the performance of their duties.

SMEC operates in a global context and aims to ensure that any initiatives develop under this Code of Conduct will be managed in accordance with the laws in that jurisdiction.

The Code of Conduct is supported by more detailed policies, standards, procedures and guidelines.

Applicable to

This policy is applicable to:

- All SMEC employees.
- All third-party contractors, volunteers and consultants engaged by SMEC.

Definitions, Abbreviations and Acronyms

Employee – means all those who work for, act on behalf of or represent the SMEC Group including SMEC Group employees, directors and other officers, contractors and consultants (where they are under a relevant contractual obligation) and Third Party/Representatives.

LHRM – Local Human Resources Manager

OHS – means Occupational Health and Safety

SMEC – means SMEC Holdings Pty Ltd.

SMEC Group – means SMEC and any of its controlled subsidiaries.

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Topic	Details
<p>Statement of Core Values</p>	<p>SMEC’s mission is to partner in the economic development of nations by meeting the needs of a diverse range of clients and communities through professional excellence and innovation, and deliver rewards to SMEC shareholders and rewarding careers for SMEC employees.</p> <p>SMEC seeks to achieve its mission by:</p> <ul style="list-style-type: none"> • requiring staff to act with integrity, honesty, and in an ethical manner at all times, promoting a diverse and inclusive organisational culture with high management accessibility, • a “can do” approach, where SMEC employees take pride in their achievements and • creating a place where employees are proud to work.
<p>Responsibilities of Those Working Across the SMEC Group</p>	<p>SMEC employees must:</p> <ul style="list-style-type: none"> • comply with this Code and other SMEC policies and procedures, and any legislation applicable to their role • provide advice or services that is honest, impartial and comprehensive, irrespective of their personal views on a matter • perform their duties to the best of their ability and be accountable for their performance • follow reasonable instructions given by a supervisor or manager • comply with a lawful direction • carry out their duties in a professional, competent and conscientious manner, while seeking suitable opportunities to improve their knowledge and skills, including through participation in relevant professional development • maintain any credentialing, qualifications and registration requirements relative to their role • be courteous and responsive in dealing with colleagues, and clients. • work collaboratively with their colleagues • be mindful of their duty to the safety of themselves and others • inform SMEC of any act of dishonesty or unlawful act. <p>In addition to the above responsibilities managers are also expected to:</p> <ul style="list-style-type: none"> • demonstrate behaviours that are consistent with this Code • ensure that employees understand their responsibilities under this Code and other SMEC policies and procedures • promote collaborative and collegial workplaces by developing a positive working environment in which all employees can contribute to the ongoing development of SMEC • exercise leadership by working with their employees to implement performance and development processes that are consistent with the employee’s conditions of employment • provide ongoing support and feedback to their employees • establish systems within their area of responsibility which support effective communication and consult with and involve their employees in appropriate decision-making • take appropriate action if a breach of this Code or any other SMEC policies and procedures may have occurred.

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	<p>SMEC is a United Nations Global Compact (UNGC) Corporate participant incorporating the UNGC's principles into business activities to help create a more sustainable global economy.</p>
<p>Occupational Health and Safety (OHS) Policy</p>	<p>The health and safety of all Employees and those visiting the organisation are considered to be of the utmost importance. The SMEC Group is committed to providing and maintaining a working environment that is safe and without risk to health so as to comply with all relevant legislative requirements.</p> <p>Bullying and occupational violence are identified as a form of harassment based on the misuse of power in human relationships and can be defined as behaviours intended to disturb, threaten or upset.</p> <p>Workplace bullying and occupational violence are health and safety hazards which are not tolerated within the SMEC Group.</p>
<p>Equal Employment Opportunity and Diversity</p>	<p>The SMEC Group, is committed to promoting an inclusive organisational culture, and strives to drive a workplace where people are treated with dignity, respect and consideration at all times.</p> <p>SMEC does not condone any behaviour which may be perceived as bullying, intimidation, discrimination, or any form of sexual or workplace harassment. As such SMEC encourages the development of an inclusive and diverse workforce and believes that diversity is a strength for our people, our clients, our partners and our communities.</p> <p>SMEC's people strategy is underpinned by a commitment to attract the best talent and engage in recruitment and selection processes that are based on merit. SMEC expects all recruitment activities to be undertaken free of bias or discrimination, and to comply with relevant local legislation.</p>
<p>Confidentiality and Privacy</p>	<p>SMEC is bound by the privacy legislation of the country in which it operates. A set of strict policies to provide Employees with guidelines for collection, storage, use and disclosure of personal information has been developed.</p> <p>Maintaining confidentiality is vitally important to SMEC's business. The reputational consequences of failing to maintain confidential information of a third party are disastrous and may lead to SMEC being disqualified from bidding for certain types of work and with a large range of clients.</p> <p>It is the responsibility of each Employee to be aware that any personal information they come across is highly confidential and will only be used for that purpose for which it was collected.</p> <p>Under no circumstances may any Employee pass on any personal information unless they have the client's consent to do so. Employees may however disclose personal information where they are under a legal duty to do so.</p> <p>Employees will not collect sensitive information about a client which includes such things as information about a client's health, racial or ethnic origin, political opinions or membership of political associations unless the client has given their consent.</p>
<p>Child Protection</p>	<p>As a global corporate citizen, SMEC recognizes the role it can play in supporting local communities, including through sharing in the collective responsibility of all adults to prevent child exploitation and abuse.</p> <p>SMEC maintains a zero tolerance policy in relation to child abuse and exploitation, including unacceptable behaviour directly involving children or observed by children, and any form of child exploitation material. SMEC commits to preventing a person from working with children if they pose an unacceptable risk to children.</p>

Topic	Details
	<p>Employees are expected to familiarize themselves with the SMEC Child Protection policy and if assigned, complete the online training module. All Employees are encouraged and expected to report any behaviour that they suspect may be child exploitation or abuse, including possession of child exploitation material.</p>
<p>Drugs and Alcohol Policy</p>	<p>In line with SMEC’s commitment to providing a safe and healthy workplace, employees are expected to be able to function at an acceptable level of performance and not be impaired by illegal or legal drugs, including alcohol.</p> <p>SMEC prohibits the possession or use of illegal substances and requires all employees to act responsibly in their consumption of alcohol at all work related function including (but not limited to) staff functions, conferences, group and farewell lunches, events organised by the social club, client function or end of financial year and Christmas celebration. Excessive consumption of alcohol is to be avoided – this is both a safety and social responsibility.</p> <p>Action will be taken in instances where an employee’s ability to perform their duties is impaired or other employees are placed at risk.</p> <p>Any illegal drugs found on SMEC property or in the possession of any person on SMEC property will be reported to the Police.</p> <p>Employees must report incidents involving illegal drug use to their LHRM.</p>
<p>Appropriate Use of SMEC Assets Including Electronic Communication</p>	<p>Employees have access to a wide range of tools including information technology and communication systems to assist them in performing their roles. Employees must protect SMECs assets which must not be used for unethical or illegal purposes, or for purposes not related to SMEC business or in a manner that breaches SMEC’s Business Integrity Policy.</p> <p>SMEC provides electronic communication facilities for its employees for work purposes. Employees must, therefore, comply with SMEC’s Social Media procedure.</p> <p>SMEC reserves the right to monitor and view any data stored or transmitted using SMEC’s facilities.</p> <p>It is a criminal offence to breach the ownership rights of any other person or company. No employee should therefore use software that they know is unlicensed or pirated or pirate software themselves. Substantial penalties can be imposed upon both the company and you if you breach somebody else’s copyright.</p>
<p>Media Comment and Social Networking Sites</p>	<p>Public comments about SMEC should only be made by the CEO. If an employee inadvertently makes a public comment (including sensitive information) the employee must immediately inform their direct Manager and the General Manager, Corporate Affairs.</p> <p>Employees are not authorised to comment to the media on any aspect of SMEC’s business.</p> <p>If approached by media, employees must refer all enquiries to the Manager Stakeholder Relations via email.</p>
<p>Complying with the Code of Conduct</p>	<p>The principles contained in this policy provide employees with a clear set of standards on which to base their behaviour across all areas of professional activity. However, SMEC’s Code of Conduct is not intended to be exhaustive and cannot anticipate every situation which may morally or ethically compromise the employee, or SMEC.</p> <p>In the instance where employees are faced with situations that are not specifically addressed in this code, asking the following questions can assist in determining an appropriate course of action:</p>

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	<ul style="list-style-type: none"> • Is it legal and in line with SMEC values, principles, policies, procedures and guidelines? • Do my actions put anyone's health and safety at risk? • If the story appeared in the media, would I feel comfortable with the decision? • Do I have all the information that is significant to the decision I am about to make? • Would you be confident explaining your actions to senior management or external authorities? • Are my actions transparent? Is there anyone else who I should make aware of my actions? • What will the consequences be for my colleagues, SMEC, other parties and me? • Would I be happy if I were treated this way? <p>Employees who fail any of the above tests or have any doubts about appropriate course of action need to discuss their concerns with their manager or supervisor or local HR Manager.</p>
<p>Reporting a Contravention or Suspected Contravention of this Code of Conduct</p>	<p>If any Employee becomes aware of any breach or suspected breach of this Code of Conduct (or any procedures to which it refers) or has concerns about how it is being applied, the breach, suspected breach or concern must be reported in the first instance to their supervisor or manager.</p> <p>Where this is not possible or it is inappropriate to do so, the Employee should contact their Regional Manager or Regional Director.</p> <p>Reports of suspected contraventions of SMEC's Business Integrity Policy or related Procedures should be reported through the reporting channels in the Business Integrity Policy.</p> <p>While all Employees are encouraged to raise their concerns, such action should be genuine and must not be done with mischievous or malicious intent. Non-genuine concerns raised with mischievous or malicious intent can be used as grounds for disciplinary action, which may include dismissal.</p>
<p>Safeguarding Against Retaliation</p>	<p>Retaliation is any direct or indirect detrimental action recommended, threatened or taken against an individual for officially reporting suspected misconduct in good faith or otherwise cooperating with duly authorised audits or investigations. SMEC prohibits any such Retaliation by its Employees.</p> <p>Retaliation is grounds for disciplinary action, which may include dismissal.</p>
<p>Disciplinary Action for Breaches of the Code of Conduct</p>	<p>Failing to comply with required behaviours outlined in this Code of Conduct (and the procedures to which it refers) is viewed as a serious matter that must be addressed by management and may lead to disciplinary action, up to and including termination of employment.</p> <p>Supervisors and managers will be held accountable not only for their own conduct, but also for that of their staff.</p> <p>Where, following an inquiry, SMEC is satisfied that a breach has occurred, the nature of any disciplinary or other action will be determined by relevant management, in consultation with other appropriate sources of advice.</p> <p>The nature of any action will depend on the seriousness of the breach and other relevant circumstances. Examples of disciplinary action that may be taken include a discussion with a manager about desired behaviour, a verbal or written warning,</p>

Topic	Details
	<p>counselling, transfer to a position with a lower level of responsibility, suspension and dismissal.</p> <p>If the situation involves a violation of law, the matter may also be referred to the appropriate law enforcement authorities for consideration.</p> <p>The following misconduct may also result in discipline:</p> <ul style="list-style-type: none">• requesting others to breach this Code of Conduct and/or the procedures to which it refers;• failing to raise promptly, known or suspected breaches of this Code of Conduct and/or the procedures to which it refers;• failing to co-operate in investigations of possible breaches regarding your own behaviour;• failure to demonstrate leadership and diligence to ensure compliance with this Code of Conduct and the law.
Encouragement of Associated Companies to Adopt this Code of Conduct	Associated Companies, such as joint ventures, not under SMEC Group control are strongly encouraged to adopt this Code of Conduct and any procedure or guideline associated with it.



engineering positive change

SMEC simplifies the complex. We unlock the potential of our people to look at infrastructure differently, creating better outcomes for the future.

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