



CODE OF CONDUCT POLICY

MSFWA is committed to conducting our operations with the highest standards of integrity, transparency and accountability. This Code of Conduct outlines the behaviour expected of all personnel—employees, contractors and business partners—while engaged in activities related to MSFWA or its client sites. This Policy applies to all individuals performing work on behalf of MSFWA. It supports a culture of ethical practice, lawful behaviour, and respect for the communities and environments where we operate.

MSFWA is committed to:

- Promoting ethical decision-making and avoiding conflicts of interest.
- Preventing bribery, corruption and other unlawful behaviour.
- Encouraging the reporting of misconduct through safe and confidential channels.
- Protecting confidential information obtained through business dealings.
- Engaging positively and respectfully with local communities.

Please note: This Code of Conduct does not define every possible scenario or ethical dilemma. All personnel are expected to exercise sound judgement, comply with all applicable laws and company policies, and act in a manner consistent with MSFWA's values. Compliance requires, but is not limited to, the standards outlined below:-

Managing Conflicts of Interest

- Requiring workers to disclose any actual, potential or perceived conflicts of interest to their supervisor or manager.
- Avoiding personal relationships, external business interests, or investments that may improperly influence business decisions.
- Ensuring all decisions are made in the best interest of MSFWA without personal or third-party gain.

Anti-Bribery and Corruption

- Strictly prohibiting the offering, accepting, or solicitation of bribes, kickbacks, facilitation payments, or other improper benefits.
- Maintaining robust controls to detect and prevent corrupt activity across all operations.
- Training personnel to recognise and respond to potential bribery or corruption risks.

Whistleblower Mechanism

- Providing clear, confidential, and anonymous reporting channels for concerns about misconduct.
- Protecting whistleblowers from victimisation or retaliation, in line with Australian whistleblower protection laws.
- Investigating all concerns promptly, fairly and with integrity.

Confidentiality

- Requiring all personnel to safeguard confidential and commercially sensitive information.
- Prohibiting unauthorised disclosure or use of business information, both during and after employment.
- Ensuring only authorised personnel have access to sensitive data.

Community Engagement

- Respecting the rights, values, cultures and traditions of the communities in which we operate.
- Supporting local development and environmental stewardship through responsible practices.
- Ensuring open and honest communication with community stakeholders.

We encourage all of our stakeholders to contribute towards the development of this Policy and to challenge any non-compliant or ineffective practices.

APPROVED: 1 March 2025

REVISION No.: 1

This Policy will be reviewed every 12mths to ensure its appropriateness, accuracy and value

A handwritten signature in black ink, appearing to read "Peter Johnson", written over a horizontal line.

Peter Johnson
Director

A handwritten signature in black ink, appearing to read "Gary Foster", written over a horizontal line.

Gary Foster
Director