

SWAN VALLEY CIVILS

CODE OF CONDUCT

The strength of our business comes from the people who represent it. Our operators, our support team, our contractors, and everyone who contributes to our work. Our reputation is built not only on the quality of our services, but on the way we conduct ourselves every day.

This Code of Conduct outlines the standards we expect from anyone working with or on behalf of the Company. It reflects the values we believe in: doing the right thing, acting professionally, and maintaining the highest level of integrity in everything we do.

We are committed to:

- Acting with honesty, fairness, and respect.
- Making decisions that follow both the letter and spirit of the law.
- Carrying out our work ethically, safely, and to the best of our ability.
- Building positive relationships with clients, suppliers, co-workers, and the wider community.

Everyone associated with the Company is expected to understand and uphold these principles. By following this Code, we maintain a workplace we can be proud of and ensure our business continues to operate with professionalism, trust, and accountability.

Thank you for your commitment and support.

SWAN VALLEY CIVILS

Safety Culture

Safety is embedded throughout our organisation. We encourage everyone to participate in hazard identification, risk reduction, and proactive safety leadership. By promoting accountability and open communication, we work to prevent incidents, reduce workplace risks, and create an environment where every person feels protected and supported.

Key Safety Principles

- Comply with all applicable health and safety legislation, regulations, industry standards, and codes of practice.
- Apply a structured and proactive approach to managing Health, Safety, Environment, and Quality (HSEQ) risks across all projects.
- Identify, assess, and effectively control workplace hazards to minimise risk to employees, contractors, clients, and the public.
- Set clear, measurable HSEQ objectives and routinely review performance to support continuous improvement.
- Maintain a strong safety culture where all personnel understand their responsibilities and are empowered to participate in hazard identification and risk control.

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- Conduct regular audits, inspections, and assessments to enhance safety performance and awareness.
- Monitor, record, and transparently report all health, safety, and environmental matters.
- Provide ongoing training and guidance to ensure employees and contractors can carry out their work safely and responsibly.
- Engage with clients, partners, and stakeholders to encourage sustainable work practices that eliminate or reduce environmental impacts.

Acknowledgment and Agreement

By signing their employment contract, all employees acknowledge and agree to comply with this Policy as part of their commitment to Swan Valley Civils' values, expectations, and safety standards. Subcontractors are likewise deemed to accept and adhere to this Policy through the continuation of their services with Swan Valley Civils Pty Ltd.

This Policy will be formally reviewed every two (2) years from the date of issue, or sooner if required to reflect changes in legislation, industry standards, or operational practices.

SWAN VALLEY CIVILS

Compliance with Laws

We meet all legal and regulatory requirements, including employment, safety, environmental, anti-bribery, and anti-corruption laws. We expect the same of our contractors and suppliers.

Conflicts of Interest

We avoid conflicts between personal interests and company responsibilities. Any actual or potential conflicts must be disclosed immediately.

Anti-Bribery & Corruption

We do not offer or accept bribes, kickbacks, or improper payments. All business is conducted fairly, ethically, and transparently.

Confidentiality & Data Protection

We protect company, client, and employee information. Confidential data is handled securely and used only for legitimate business purposes in line with privacy laws.

Fair Business Practices

We compete ethically, avoid anti-competitive behaviour, and maintain professional, respectful relationships with all stakeholders.

Community & Social Responsibility

We positively contribute to local communities, support Indigenous participation, encourage local employment, and engage with suppliers who align with our values.

SWAN VALLEY CIVILS

Code of Ethics Policy

Swan Valley Civils is committed to operating with integrity, respect, and accountability. This Code of Ethics outlines the principles that guide our decisions, actions, and relationships with employees, contractors, clients, suppliers, and the community.

Integrity & Transparency

We act honestly and fairly in all business dealings, maintain accurate records, and communicate openly. Ethical concerns can be raised without fear of retaliation.

Respect & Inclusion

We value diversity and provide a workplace free from discrimination, bullying, and harassment. All people are treated with dignity, and cultural awareness is supported across our operations.

Health, Safety & Well-being

We prioritise the safety of our workforce and the public. We comply with all safety laws, maintain safe systems of work, and encourage the reporting of hazards and unsafe practices.

Environmental Responsibility

We minimise environmental impact, comply with environmental regulations, and integrate sustainable practices into planning and project delivery.

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Accountability & Reporting

Everyone is responsible for upholding this Code. Unethical behaviour must be reported and will be investigated fairly, with corrective actions implemented as required.

Continuous Improvement

We regularly review and improve our ethical standards and provide training to support responsible decision-making.

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