

# Code of Conduct

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## PURPOSE AND APPLICATION

### Purpose of this code

The Company is committed to and strives to act honestly and with integrity in all its dealings and to act ethically and responsibly. This code of conduct sets out the values, commitments, ethical standards and policies of the Company and outlines the standards of conduct expected of our business and people, taking into account the Company's legal and other obligations to its stakeholders.

The board of directors of the Company ("**Board**") has endorsed this code. The Board and management believe that the Company's commitment to this code will maintain the confidence of the Company's key stakeholders in the Company's integrity.

### Application of this code

This code applies to all directors of the Board, as well as all officers, employees (whether full-time, part-time, fixed term, fixed task, casual or temporary), contractors (whether individual contractors or employees of incorporated contractors engaged by the Company), consultants and other persons that act on behalf of the Company or related bodies corporate or associates of the Company. This code is not contractual and does not give you contractual rights.

You are expected at all times to act consistently with the values, commitments and ethical standards as set out in this code of conduct. This code operates in conjunction with the Company's policies, procedures and the Bingo Way relating to you. If there is any inconsistency between this code and those policies, this code prevails.

It is essential that each of you are familiar with this code, which is available on the Company's website. Naturally, this code cannot cover every circumstance that you may face nor can it address every law, regulation or company policy that may apply to you. You are encouraged to obtain copies of the policies, standards and procedures relevant to your work. If you have any questions about your obligations or about the Company's expectations, please speak with your manager, the Company Secretary, or the Company's legal department.

## OUR VALUES AND COMMITMENTS

### Core values and commitments

The Company's core values and commitments are:

- **Integrity** – We act honestly and with integrity in all our dealings, both internally and externally. We deal honestly with suppliers and customers. We commit to only dealing with business partners who demonstrate similar ethical and responsible business practices.
- **Respect** – We respect the human rights of all people, their ideas and cultures and our words and actions must reflect this respect.
- **Safety** – We are committed to providing and maintaining a safe and non-discriminatory working environment to safeguard the health and safety of our employees, consultants, contractors, customers, suppliers and other persons who visit our workplace, or who we work with, as required by law.
- **Community Standards** – We act in a manner consistent with reasonable expectations of our investors and the broader community.
- **Environment** – We are committed to act responsibly towards the environment.

## TRANSPORT – SAFETY, ENVIRONMENT AND QUALITY (SEQ) BASICS

The Company's non-negotiables regarding transport operations:

- **Comply with all road rules and driver fatigue laws** – Bingo drivers must maintain an appropriate licence and Bingo carry out regular licence checks to ensure drivers are operating within the law.
- **Drivers must be fit for duty, drug and alcohol free** – Bingo has a ZERO TOLERANCE to drugs and alcohol.
- **Full Personal Protective Equipment (PPE) and Company uniform must be worn and in good condition** – All drivers are equipped with a full PPE kit and are regularly audited by Bingo to ensure best practice.
- **All loads must be strapped and tarped appropriately** – Bingo is committed to being an industry leader in insuring our loads are covered and restrained in accordance with load restraint standards and road rules.
- **Keep noise and dust to a minimum and comply with local curfew times and noise restrictions where applicable** – Drivers are trained in the awareness of site hours and curfews.
- **Ensure all equipment is kept in good condition, free from defect/damage, neat and tidy** – Bingo drivers are responsible for reporting all defects.

- **Incidents and near misses must be reported** – All incidents are reported and investigated by Bingo's Compliance Team consistent with best practice ISO accreditation 9001, 14001 and 4801.
- **Always be courteous to customers and members of the public** – Bingo staff pride themselves in their values which is best explained by the **bingo** way, being:

*Be Loyal*

*Inside the Law*

*Never Say Never*

*Greatness is Earned*

*One Team, One Family*

### **Recycling – Bingo Basics**

The Company's non-negotiables regarding Recycling Operations at all our Recycling Centres:

- Keep stockpiles tidy and control height
- Dust and litter must not leave site
- Operations to cease in high wind
- Water entering site drains clean and clear
- Noise and vibration monitored and controlled
- Be respectful of neighbours
- Avoid tracking of mud and dirt
- Everyone must wear PPE in good condition
- All pre starts to be done and documented
- Site organised, clean and tidy

## **OUR ETHICAL STANDARDS AND POLICIES**

### **Conflicts of interest**

A conflict of interest occurs if your loyalties are divided, for example if you or your family or friends have a personal or commercial interest which may interfere, or be perceived to interfere, with the performance of your duties and responsibilities to the Company, making it difficult to perform your role objectively and effectively. The existence of a conflict of interest is not uncommon. What matters is how we manage the conflict.

You must act in the best interests of the Company. To safeguard the confidence of the Company's key stakeholders in the Company's integrity, it is paramount that you do not allow personal interests or the interests of family or friends to conflict with the interests of the Company. You must avoid participating in decisions and activities which may conflict, or be perceived to conflict, with your duties and responsibilities to the Company.

You must not enter into any arrangement or participate in any activity that would conflict with the Company's best interests or would be likely to negatively affect the Company's reputation.

You must not be involved in any other company or business or organisation as director, agent, employee or consultant, whether paid or unpaid, if there is a possibility that your personal interests could conflict, or be perceived to conflict, with those of the Company unless you obtain approval first from your manager or the Company Secretary or the Board (if you are a director). You should be particularly aware of the potential for conflict in areas like purchasing, engagement of consultants or contractors, sales and marketing, and the giving and receiving of gifts, prizes and hospitality.

If you are involved in a conflict or possible conflict, or become aware of a conflict, you must tell your manager, the Company Secretary, the Company's legal department, or the Board (if you are a director) as soon as possible.

### **Opportunities, benefits and ownership of work**

You must not use Company or customer property (including intellectual property), or information, your position or opportunities which arise from these to improperly gain benefit for yourself or for another party or to cause detriment to the Company or its customers.

You have an obligation to avoid all financial, business and other arrangements which may be opposed to the interests of the Company, or which may place you in a competitive position with the Company.

The product of any work performed while you are with the Company, or on behalf of the Company, or using Company property (including all intellectual property rights created in connection with that work) belongs to the Company.

### **Anti-bribery and gifts**

A number of countries, including Australia, have strict laws against bribery and corruption. The anti-bribery laws of some countries including Australia, Brazil, Canada, the United States and United Kingdom can apply to things done in other countries (ie wide-reaching extra-territorial effect). We must comply with and uphold all laws against bribery, corruption and related conduct applying to the Company in all the jurisdictions where the Company operates. The Company will report any actual or intended bribery or corruption to the appropriate law enforcement agencies.

Accordingly, the Company has a strict policy not to offer secret commissions or bribes to further its business interests. Depending on the circumstances, facilitation payments may breach anti-bribery laws.

Naturally, you must not accept any money or opportunity or other benefit which could be interpreted as an inducement, secret commission or bribe. Care must be exercised in accepting hospitality, entertainment or gifts over and above that required for the normal conduct of business or which may compromise your impartiality. All officers, employees, contractors and consultants are prohibited from soliciting any hospitality, entertainment or gifts over and above that threshold. The fundamental principle is that you should not do anything that is against the law or which might create an obligation or a real or perceived conflict of interest.

We are committed to adopting effective systems to counter bribery and related improper conduct and to monitoring and enforcing these systems. From time to time, we may issue further guidance regarding what is acceptable in the normal course, what you can do with senior manager or Board approval and what is prohibited.

You may also seek further information or clarification from your manager, the Company Secretary, legal counsel, the Board (if you are a director) or other relevant advisor.

### **Dealings with politicians and government officials**

All dealings with politicians and government officials which relate to the Company and its business activities must be conducted at arm's length and with the utmost professionalism, to avoid any perception of attempts to gain advantage or to improperly influence the outcome of an official decision.

You must not make any donation or other financial contribution to any political party or candidate for an election or sponsor any organisations (other than in a purely personal capacity) without seeking and obtaining prior approval from the Company's legal department.

### **Freedom of association and collective bargaining**

The Company respects its officers, employees, contractors and consultants' rights to join, form or not to join a labour union without fear of reprisal, intimidation or harassment. Where officers, employees, contractors or consultants are represented by a legally recognised union, we are committed to establishing a constructive dialogue with their freely chosen representatives. The Company is committed to bargaining in good faith with such representatives.

### **Confidentiality**

In the course of the Company's business, you will have access to business or personal information about the affairs of the Company, its clients, customers, employees, suppliers and our business partners. It may include business strategies, marketing and sales plans, competitive analysis, financial plans and forecasts, customer or employee information, supplier information and pricing. Each of the parties expects the confidential nature of the information they have given in good faith to be respected.

You must keep confidential information acquired while you are with the Company, or acting on behalf of the Company, confidential, even after you leave or cease your engagement with the Company.

You must not access or request or make improper use of or transfer or disclose confidential information to anyone else except as required by your position or as authorised or legally required. If it inadvertently comes into your possession it should be returned immediately.

If you are required by an authority to provide confidential information which has not been otherwise authorised, you must notify the Company Secretary.

### **Privacy**

You must respect and safeguard the privacy of personal information held by the Company regarding its clients, customers, suppliers, employees and others. If you have access to this information, you must ensure that it is collected, kept, disclosed, handled and used in a manner that complies with the *Privacy Act 1998* (Cth), Australian Privacy Principles any other privacy and data protection laws that may apply and the Company policy on privacy.

## **Respectful dealing**

You must treat each other and all suppliers, competitors, clients, customers and other stakeholders with respect. You must act honestly and with high standards of personal integrity, and behave with politeness and courtesy. This means not using indecent, offensive or abusive language, not speaking in native tongue to other officers, employees, contractors or consultants and never threatening or engaging in violent behaviour such as fighting or assault. This also applies when using two-way communication devices in trucks and recycling centres.

The Company is committed to ensuring a diverse work environment in which everyone is treated fairly and with respect and where everyone feels responsible for the reputation and performance of the Company. For further information, see the Company's diversity policy.

Applicants for employment are evaluated by the Company on merit in accordance with their skills, qualifications and abilities, and having regard to the Company's operational needs.

The Company is committed to ensuring the highest quality of service is provided to its customers and clients at all times. The Company makes decisions regarding suppliers and contractors on merit and a commercial basis.

The Company collects information about its competitors and others in a lawful manner.

## **Discrimination, bullying, harassment and vilification**

Discrimination, bullying, harassment (whether sexual or otherwise) or vilification in the workplace or while off duty (including at third party functions) will not be tolerated by the Company. Any such conduct will be dealt with in accordance with Company policy.

Bullying is repeated behaviour directed towards another person or group of people that could reasonably cause them to feel victimised, intimidated, humiliated, undermined or threatened, in all the circumstances.

Sexual harassment is an unwelcome sexual advance, an unwelcome request for sexual favours or other unwelcome conduct of a sexual nature that offends, humiliates or intimidates a person, where a reasonable person would anticipate that reaction in all the circumstances. Other forms of harassment may be based on personal characteristics, race, language or other discriminatory factors.

## **Health and safety**

The Company is committed to ensuring the health and safety of its employees, consultants, contractors and visitors to its workplace and any other persons who the Company works with, as required by law. You must comply with the laws and regulations that apply to the Company and its operations.

Company officers have additional due diligence health and safety obligations which they must comply with. The use of alcohol and drugs may impair performance at work, have an adverse impact on productivity, and can pose a risk to health and safety. To assist with ensuring the safety of our workplace, the consumption of alcohol, and the use of any prescription drugs which may impair a person's ability to perform their work, or which pose a risk to their or others' health and safety, must be strictly in accordance with Company policy.

You must not knowingly participate in any illegal or unethical activity. The Company will not tolerate the use of illegal drugs or improperly used prescription medicine, or alcohol (except for moderate consumption at social events) on Company premises or when performing work for the Company, travelling on behalf of the Company, attending work related functions or activities or conducting business on the Company's behalf. The possession, use, sale or offering or distribution of illegal drugs or other controlled substances on Company premises or while performing work for the Company, conducting Company business, travelling on behalf of the Company or at work related functions or activities is forbidden.

It is important that we work together to create a safe and healthy workplace. If you know of or suspect any unsafe situations or conditions, please alert your manager or supervisor immediately.

## **Protection of and use of the Company's assets and property**

You must protect the Company's assets and property (including intellectual property) and ensure that the Company's assets and property are used only for the benefit of the Company's business. You must report any suspected or actual theft or fraud to your manager or the Company Secretary or any other contact nominated by the Company.

You must not use the Company's assets or property for personal purposes except in accordance with any Company policy or approved arrangement.

You must return Company assets and property immediately upon request by the Company.

All expenses must be documented and reported in a timely manner.

### **Compliance with laws and regulations**

The Company is committed to complying with the laws and regulations of the countries in which we operate which relate to the Company.

You must comply with all laws and regulations relating to the Company, including document retention requirements. You must also comply with the technical and ethical requirements of any relevant regulatory or professional body. You must not breach, or omit to do something in breach of, any law or regulation or requirement. All actual or potential breaches must be reported immediately to the Company Secretary, the Company's legal department, or your manager. You will be held personally accountable if you break the law while working for the Company (or otherwise).

Where local laws or regulations differ from this code, you must apply this code or local requirements, whichever sets the higher standard of behaviour. For example, by not employing forced or compulsory labour (whether prison, indentured, bonded, military or slave labour or any form of human trafficking) or young children even where that may be legally permitted.

It is important that you understand the laws that apply to your work. Ignorance of the law or having a good intention does not excuse your obligation to comply. You must participate in relevant compliance training programs offered by the Company.

If you are uncertain about the interpretation of any applicable law or regulation or requirement, contact your manager, the Company Secretary, or the Company's legal department or a relevant advisor.

### **Responsibility to shareholders and the financial community**

The Company is committed to providing value to its shareholders and recognising the legitimate interests of other stakeholders. The Company has policies regarding the timely provision of information to its shareholders and other stakeholders including posting information to its website. It has processes to ensure that the accounts and financial information it provides represent a true and fair view of the financial performance and position of the Company.

You must fully cooperate with, and not make any false or misleading statement to, or conceal any relevant information from, the Company's auditors.

### **Environmental responsibility**

The Company considers both the environmental impacts and benefits of its decisions and business activities. The Company seeks better environmental outcomes for all of its business activities.

### **Insider trading**

Insider trading laws prohibit a person in possession of material non-public information relating to a company from dealing in that company's securities. Insider trading is a serious offence under the *Corporations Act 2001* (Cth).

The Company's Trading Policy is available on the Company's website. It provides guidance so that you do not deliberately or inadvertently breach the insider trading laws or the Company's policy.

### **Whistleblower protection**

You are encouraged to report any actual or suspected unethical behaviour including excess waste or breach of the Company's codes and policies to your manager, the Company Secretary, or the Company's legal department or any other contact nominated by the Company. Matters raised will be investigated.

The Company is committed to ensuring that you can raise legitimate concerns in good faith without being disadvantaged in any way to the extent that the law permits.

### **Grievance**

A grievance is a work related concern, problem or dissatisfaction. It may be about an incident, situation or decision that the officer, employee, contractor or consultant believes affects work performance or the work environment. The Company regards the raising and settling of grievances as an important part of a culture of continuous improvement.

## **PROMOTING AND PUBLISHING THIS CODE**

The Company and its management will promote this code across the organisation and provide training on the topics it covers.

A copy or summary of this code will be available on the Company's website. It will be distributed to all directors, employees and other persons as relevant. Key features will be published in the annual report or a link to the code or a summary on the Company's website provided.

**Breach of this code**

The highest standards of corporate conduct are critical to the Company's success and image. The values and policies in this code are not exhaustive. This code is designed to focus you on particular values identified by the Company as central to its integrity.

Compliance with this code and the Company's policies, procedures and the Bingo Way will be monitored and any known or suspected breaches will be investigated. If a breach is found to have occurred, you may face legal or disciplinary action including termination of employment, civil action or referral to law enforcement agencies.

**Administration****Where can I obtain further information?**

The Company has a dedicated person responsible for the administration of this code. At the date of adoption of this code, this is the Company Secretary.

If you require further information or assistance, or are uncertain about the application of this code or the law, please contact the Company's legal department, or Company Secretary.

**Review of this code**

The Board will review this code from time to time. This code may be amended by resolution of the Board.



Daniel Tartak  
Managing Director and Chief Executive Officer