

Code of Ethics

Working with integrity

ANC is highly regarded as a leading transport business. Our reputation has been built on trust. This trust has been earned over many years, through leaders, employees and contractors who have enhanced and safeguarded our reputation, by their repeated demonstration and high standards of integrity and ethical conduct.

ANC is committed to maintaining this reputation among clients, customers, business contacts, competitors and the wider community. Our reputation is a valuable asset, as it influences how people perceive us as a business partner, competitor and community member. It depends on each one of us to continue to protect it. This means we must all set a good example and conduct ourselves in a way that demonstrates the highest ethical standards as we go about our work.

Ethics, quite simply, is about knowing the right thing to do, and doing the right thing. It governs what we say and don't say, what we do and don't do. Our clients and colleagues expect us to be honest and to act with integrity. This means knowing we have acted honestly and treated each other as well as our clients, partners, drivers, suppliers and community properly at all times.

ANC's *Code of Ethics* is a framework for the kind of personal behaviour that is fundamental to our business success. The Board of Directors and the Executive have endorsed this Code and it is consistent with the Board's Code of Conduct and ANC *Statement of Business Ethics*. It outlines our corporate values and principles, guiding our day-to-day behaviour.

Occasionally, our decision and values may be challenged in the course of our work. When this happens, it is important to think carefully about possible consequences and, of course, refer to the guidance provided in our *Code of Ethics*.

I encourage you to take the time to read the Code. If you require clarification on an issue, please ask for guidance from your manager.



James Taylor
Director
ANC

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1. Our Core values

These are the principles we use to navigate the business, represent our brand and conduct ourselves. At ANC, we build trust and partnerships on five core values:

SAFETY: We all work safe, to ensure everyone goes home safe, every day.

RESPECT: We respect everyone and the role they play regardless of title or position.

HONESTY: We are candid and transparent to protect our integrity and trust.

LOYALTY: We can rely on you. You can rely on me. We've got your back!

CARE: We genuinely give a damn about you, your business and your brand.

2. Safety excellence

ANC's safety commitment is to zero accidents, injuries and workplace illnesses. This commitment is supported by making safety our first priority; a belief that all accidents are preventable; working safely is a condition of employment; not taking shortcuts; not accepting unsafe behaviour; and expecting personal accountability for safety from everyone.

We live by this value by understanding we all have a role to play in the Chain of Responsibility (COR), learning how to work safely; maintaining awareness in all tasks; having an orderly work area; checking for and fixing hazards; coming to work free of drugs and alcohol that could impair performance; taking action to correct unsafe working practices; looking for opportunities to participate in and improve safety performance; and, immediately reporting all near misses, incidents and workplace illnesses.

3. Integrity

At all levels of the organisation and in all its business dealing, ANC aims to act with honesty and to achieve the highest level of integrity. This means setting consistent policies and maintaining soundness of moral principle and character.

We each have a responsibility to ensure ANC resources are used properly; and that our business dealings are free from conflicts of interest. We will take ownership and responsibility for our actions and we will demonstrate outstanding leadership as an example to others.

4. Human Rights

ANC support and uphold the provisions of the Industrial Relations (Child Employment) Act 2006 (NSW) on child labour. We will not tolerate child labour or forced labour in our own operations or those of our suppliers. The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the state, whichever is greatest. Information specific to suspected child labour violations can be found at <https://ancsafety.com.au/>

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5. Management by fact

Management by fact forms the backbone of our approach to planning and decision making. It encompasses the use of all available information to make objective, impartial and confident business decisions and open and honest disclosure of relevant information to shareholders and clients/customers.

We also respect the confidentiality of certain business information and do not use this inappropriately.

6. Enterprising spirit

ANC is committed to fostering an enterprising spirit within its people.

This pioneering 'can do' attitude is core to our business growth and success. It means we are open to fresh thinking and new ideas; and encourage effort and learning in our people in order to stimulate creativity. We will pursue opportunities for business change while managing risks.

To encourage our people to find solutions creatively, support will be provided from management for teamwork and collaborative frameworks, underpinned by the recognition of the contribution of our people and their value to the business.

7. Customer commitment

We want ANC to be recognised for focusing on delivery superior value to our clients, customers and our shareholders now and into the future. This means taking personal responsibility to deliver a standard of service that goes beyond customer expectations and exceeds the service provided by our competitors.

In providing this service we have a responsibility to deal in a fair, open and honest way with all our customers; to review, challenge and improve work practices and processes which stand in the way of better standards of customer service; and to recognise that, in the end, customer loyalty depends on individual relationships with our customers.

8. Respect for people

At ANC we respect a 'fair go for all'. This value is crucial to the personal and professional standards expected in our workplace. It means we respect the principles of equal employment opportunity; acknowledge and value diversity in culture and opinion; offer opportunities for promotion on merit; cultivate an environment of trust through open and honest communication; promote self-improvement and skills development; encourage effective empowerment, teamwork and participative decision making; and continually review our safety standards to ensure a healthy and safe environment for our employees, clients, customers and the community.

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9. Workplace Bullying

ANC is a bullying and violence-free workplace. Bullying is unreasonable behaviour that is repeated over time, directed towards a worker, or group of workers, that creates a risk to health and safety. Single incidents of unreasonable behaviour can also create a risk to health and safety and is not acceptable as part of ANC's work culture. Our Discrimination, Bullying and Harassment policy provides more information in this specific regard.

10. Accountability and responsibility

Complementing the value of 'Respect', and the personal and professional workplace standard it demands, we take responsibility and accountability for our actions, and maintain the integrity of performance within our area of responsibility. In all our business dealings, we will promote trust, openness, teamwork, professionalism and pride in what we do.

11. Sustainable outcomes

ANC recognises the significant corporate responsibilities we carry as a leading transport company. As a responsible corporate citizen, we strive for sustainable outcomes by balancing the 'triple bottom line' interests of financial, environment and social responsibilities in order to ensure long-term business success. Our commercial success ensures a sustainable economic future for all our stakeholders.

We operate in a way that meets the needs of the present without compromising the ability of future generations to meet their own needs.

12. Standards of personal and professional conduct

To maintain customer confidence in the integrity of our people, it is essential that you be seen to exhibit the highest ethical standards in carrying out your duties. Take pride in your work and act and be seen to act in line with the values and principles outlined in this document.

Also, as an ANC employee, you need to operate within all laws and regulations applicable to ANC business operations.

If you do not deal fairly or honestly with customers, this may result in a breach of the Trade Practices Act 1974. A customer complaint, if proved, could lead to a heavy fine for both the organisation and the employee involved. More importantly, this will have a negative impact on our corporate reputation and your personal reputation.

Ultimately you are responsible for your own conduct and behaviour and you should understand:

- What your job is
- How your job is to be performed, including what principles you need to operate within; and
- The results you are to achieve.

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If an employee or contractor is not sure of their responsibility they should discuss the matter with their team leader or direct manager.

13. Performing your duties

In performing your duties, you must:

- Operate in a safe manner and observe the safety guidelines provided to protect you and your colleagues
- Act professionally at all times and never make (written or verbal) representations without first checking the underlying facts
- Act impartially, with integrity, be fair and do not mislead people
- Provide efficient and effective service to your customers
- Be honest in all your dealings and never be a party to anti-competitive behaviour
- Be prepared to demonstrate the reasons for your decisions
- Be alert for any conflicts of interest, real or perceived, and take appropriate steps to deal with them
- Make the best use of your knowledge and experience when exercising your technical or professional judgement
- Maintain and develop knowledge of your professional field
- Protect the confidentiality of all information made available to you or to ANC
- Look after and do not misuse ANC assets
- Do not commit fraud or engage in corrupt conduct
- Comply with ANC policies and procedures and the organisation's operating licences; and
- Always protect the good name of ANC

14. Behaviour towards others

In responding to our value of 'Respect', ethics plays a major part in the way you behave towards others. You need to:

- Treat customers and other delivery professionals with respect and sensitivity to their rights, provide appropriate assistance and, if necessary, guidance
- Lead by example and encourage your colleagues to exercise similar qualities of personal and professional behaviour to those outlined above
- Ensure that employees, contractors and resources are managed in a way that will, to the greatest extent possible, avoid the opportunity for unethical behaviour by others; and
- Follow all health and safety policies and procedures, ensuring that you work in a safe manner while not putting yourself or others at risk.

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15. Delegated authority

When making business decisions for ANC, or taking actions by exercising a delegated authority, you should ensure that:

- The decision or action is within your delegation
- It complies with all decision-making requirements and procedures required by the delegation and any relevant legislation; and
- The decision and the evidence upon which it is based are properly documented.

If you are in any doubt about the limits of your delegated authority, you should seek advice from your supervisor or manager.

16. Alcohol and drugs

You should not come to work or return to work if you are under the influence of alcohol or other drugs that could impair your ability to do your job or cause danger to yourself or others. If you are taking prescribed medication that could affect your work performance, you should discuss this with your direct manager.

17. Conflicts of interest

What is a conflict of interest?

A conflict of interest arises when your personal interests, or those of people close to you, conflict with the impartial performance of your public or professional duties.

A conflict of interest could exist where you have a personal interest, or a family member, relative or anybody close to you has an interest, which could lead you to be influenced in the way you carry out your duties. The perception of a conflict of interest could arise where circumstances exist which lead a reasonable person to think you could be influenced.

Some examples of situations that may give rise to a conflict of interest include:

- Financial interests in a matter ANC is dealing with or having friends or relatives with such an interest that you are aware of
- Personal relationships with people ANC is dealing with that go beyond the level of a professional working relationship
- Personal beliefs or attitudes that influence the impartiality of advice that you give
- Use of business information acquired through your work with ANC for personal gain
- Secondary employment that compromises your integrity or impacts on your ability to perform your employment with ANC; and
- Party political activities or making adverse political comments that relate to ANC business.

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What should I do?

It is important that customers, suppliers and colleagues can be confident that all decisions made by ANC are fair and impartial. An individual employee may often be the only person aware of the potential for conflict. Therefore, the responsibility is on you to identify any real or perceived conflict of interest and disclose it. If you think you have a conflict of interest, or that others may perceive there is a conflict of interest, or there is a likelihood that people might think you are gaining some kind of personal benefit, you must talk to your manager about ways to resolve the situation.

This applies to approval of expenditure that is within your delegated authority on items from which you gain some kind of personal benefit. Some examples of this include approving expenditure related to attendance at a function or course, acceptance of an invitation or gift, or the purchase of work materials.

It is better for all if you tell someone in higher authority that you plan to do something – before you do it. Conflicts of interest that lead to decision making that is not impartial may constitute corrupt conduct.

18. Acceptance of gifts or benefits

You must never solicit or request any gift or benefit for yourself or anyone else in connection with your employment. You must not accept any personal benefits that are offered under frequent flyer schemes, Fly Buys or other promotions as a result of expenditure of ANC funds or in connection with any official travel.

Do not accept any gift or benefit if you think, or a reasonable person could think, that you would be influenced in the way you do your job as a result of the gift or benefit.

Token gifts may only be accepted if the gift is not likely to be seen to be compromising. Token gifts are those that do not have a significant monetary value, are inconsequential or trivial, and are not offered on a frequent basis.

If you consider a gift or benefit that is more than token, you must seek permission from your manager in order to protect both you and ANC. Non-token gifts could include sporting tickets or invitations to a restaurant. These gifts may be donated to a charity.

If you are uncertain if a gift is token or not, you should discuss it with your manager.

Gifts of cash (any amount) are never considered acceptable.

If a substantial gift or benefit is offered to you to influence the way you do your work, you should report this immediately in accordance with the procedure for reporting fraud, corruption, maladministration and serious and substantial waste.

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19. Public comment

It is not appropriate for you to make public comment about or on behalf of ANC. This includes statements to the media. If you are asked to do so, please refer the caller to the Chief Executive Officer.

If in your own time, you undertake speaking engagements, express views in letters to newspapers, in books or on notices that appear in the public arena, make statements in public and at community meetings, you must ensure that you are not seen to be commenting on behalf of ANC. Employees and contractors can also be associated with ANC through their clothing, badges and vehicles. It is important that we all conduct ourselves as ambassadors for the Company.

20. Corporate information and records

Information relating to our commercial activities is an important factor in our business success and should be protected. You should not use information about ANC, its employees, contractors, customers or business relationships to gain personal advantage for yourself or other people, or to damage ANC, other people or organisations. You must also protect information from, or about, third parties.

Business information that is not confidential should be communicated in an honest and unbiased manner. If you are unsure as to the confidentiality of information, please ask your manager or supervisor.

Employees also have a responsibility to maintain the privacy of personal information and are not to release such information held by ANC. They should seek the advice of their supervisor if requested to do so.

21. Dealings with former employees of ANC

You should take care when dealing with former employees of ANC that you do not give them, or appear to give them, access to confidential or personal information.

What are my obligations to ANC after I leave?

Once you leave ANC you are obliged not to divulge any confidential information about the organisation or your job or pass on any information which may be detrimental to ANC, its employees, contractors, suppliers or customers. You must not use, or take advantage of, any confidential information obtained in the course of your employment with ANC in any new employment or business venture.

22. ANC resources

Our resources are vital to our business, helping us meet our customers' needs.

You are expected to be careful, efficient and economical in your use and management of ANC resources, including your own work time.

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ANC resources include:

- Material, equipment and vehicles
- Cash, cheques, credit cards, accounts and securities
- Documents, records, data and information; and
- Time and employees/contractors

As a general rule, ANC resources cannot be used for private purposes without specific permission. However, limited, occasional or incidental use of electronic media for private purposes is acceptable but data remains the property of ANC. For further details on computer use please see the Information Technology Policy document.

Motor vehicles are to be used in accordance with the policies and procedures dealing with the use of vehicles. If driving a company vehicle, a copy of your current drivers licence will be required to keep on file.

ANC resources and equipment shall not be used in relation to a second job or business without the specific permission of the Chief Executive Officer.

23. Secondary employment

You cannot work in any capacity for, or as, our competitor while employed by ANC as an employee (i.e. this is not applicable to contractors). This is a condition of your employment. If you do undertake other paid work, you should:

- Let your manager know about the other paid work
- Avoid revealing information about ANC business strategies; and
- Ensure the quality of your work for ANC is not affected.

ANC can require you to cease any secondary employment that adversely affects your employment with ANC.

24. Political and community participation

You are free to be involved in any activities outside working hours so long as these activities do not interfere with your normal working operations. You should not use working hours or ANC resources to conduct political or other business or social activities, or involve ANC in outside activities, unless authorised to do so.

If you are nominated as a candidate in a state or federal election, you should take leave from the day of nomination in order to conduct your campaign without risking conflict between your employment and political interests.

Under no circumstances are ANC funds to be used to make political donations.

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ANC encourages employees to get involved in volunteer and community work in their own time. However, you should not use ANC assets in this, or any other type of work, unless authorised to do so.

25. Reporting possible fraud and corruption

All employees have a responsibility not only to act honestly but also to disclose any instances of possible fraud, corruption, maladministration or serious and substantial waste. This includes acts of dishonest or unethical behaviour that can not only damage the reputation of ANC but also that of its employees.

In accordance with our procedure for dealing with fraud, corruption, maladministration and serious and substantial waste you can make a disclosure of suspected instances to the:

- Director, James Taylor (James@ancdelivers.com.au)
- Chief Executive Officer, Joe Sofra (JoeS@ancdelivers.com.au)
- Group Executive People and Culture, Maria Harrison (MariaH@ancdelivers.com.au); or
- National HR Manager, Hailey Trifiro (HaileyT@ancdelivers.com.au); or
- National HR & Payroll Manager, Jennifer Norman (JenniferN@ancdelivers.com.au); or
- Group Executive Risk & Safety, Matt Wheatley (MattW@ancdelivers.com.au); or
- Group Executive Finance, Matt Clarke-Bruce (MattC@ancdelivers.com.au).
- Independent Commission Against Corruption, for disclosures on corrupt conduct – (02) 8281 5999
- Relevant state-based ombudsman, for disclosures of serious or substantial waste – e.g. NSW (02) 9275 7100

We will treat all information given to us in the strictest confidence.

If you voluntarily make a report in accordance with this procedure you may be entitled to protection under the Protected Disclosures Act 1994. This law makes it a criminal offence for anyone to take detrimental action in reprisal against a person who makes a protected disclosure. ANC is committed to ensuring that employees are not victimised as a result of such a disclosure.

If you report fraud, corrupt conduct, maladministration or serious and substantial waste you will be treated fairly.

Protection is not available for disclosures that are frivolous or vexatious or primarily question the merits of Government policy, or are made in an attempt to avoid dismissal or disciplinary action.

Breaches of the code

ANC is committed to the standards and principles outlined in this Code. Minor breaches of the Code would normally be resolved internally and may result in counselling or the clarification of procedures to avoid further breaches. More serious breaches may lead to disciplinary action, up to and including termination of employment and/or the bringing of civil or criminal proceedings. Criminal matters will be reported to the Police and/or other appropriate law enforcement or regulatory bodies.

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Breaches that appear to involve corrupt behaviour by one or more members of staff must be reported to the Independent Commission Against Corruption (ICAC), which may then decide to investigate the incident.

An ICAC investigation may result in criminal charges against individuals and findings against ANC if shortcomings are evident in its policies and procedures.

If you are aware of any breach of this Code or any involvement in fraud or corrupt conduct by others, you should provide a report as outlined in the clause above.

All information given will be treated in the strictest confidence.

An ethics quick test

For those not-so-easy-to-answer questions

Not all ethical decisions are clearly right or wrong. In fact, many complex situations we face in business fall somewhere in between. Your own values and judgments are an excellent resource to use in making 'grey area' choices. So are our corporate values.

If, after considering all the issues, you're still uncertain about what to do, use these questions to test your decision:

- Does it conflict with our values?
- If you do it, will you feel bad? What are the consequences of making this decision?
- How will you feel explaining this to your colleagues?
- Would you be confident in explaining your actions to external authorities?
- How would it look in a newspaper?
- How will it affect the organisation as a whole?
- What is my manager's view?

If your decision passes this test and you feel confident about the decision you have made, it is probably the right thing to do. If you're still in doubt give your supervisor or manager a chance to talk through the issues with you.

To sum up, if you are not comfortable in any situation, it probably requires more thought.

Remember that you are responsible for your own actions and decisions and you are the one who must live with them.

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Employee Agreement

I have read, understand and agree to comply with the foregoing policies, rules and conditions governing ANC's Code of Ethics. I understand that violations of this guideline on ethics and appropriate behaviour may subject me to disciplinary action, including termination from employment, legal action and criminal liability. I further understand that my actions and behaviour may reflect on the image of ANC to our customers, competitors and suppliers and that I have responsibility to maintain a positive representation of the company. Furthermore, I understand that this policy can be amended at any time.

Dated: _____

[Signature]

[Printed Name]

[Job Role]

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