

Business Ethics Statement

Our purpose is to keep the ports of NSW safe, efficient and open to the world for our customers and stakeholders.

Our Business Ethics Statement guides Port Authority's contractors and suppliers on how to work with us to deliver our purpose.

Port Authority promotes its values of care, accountability, integrity, collaboration and safety, supported by a strategic vision of growing trade and tourism in NSW and our Risk Appetite Statement approved by the Board.

Our contractors and suppliers can expect Port Authority's employees¹ to behave ethically and comply with our [Code of Conduct](#), being our core policy document covering areas such as fraud and corruption, conflicts of interest and respect in the workplace among others.

This Code of Conduct is complemented by our [Supplier Code of Conduct](#) which clearly defines the minimum standards of behaviour the Port Authority expects from contractors and subcontractors that do business with us.

Expectations for Contractors and Suppliers

When engaging with us, all contractors and suppliers are required to:

- comply with this Business Ethics Statement and our [Supplier Code of Conduct](#)
- ensure that all subcontractors are aware of, and in compliance with, this Business Ethics Statement and our [Supplier Code of Conduct](#)
- comply with all applicable laws and regulations including the *Security of Critical Infrastructure Act 2018* (Cth)
- act ethically, fairly and honestly in all dealings
- comply with the Modern Slavery obligations and ensure its supply chain is free from human rights abuses, such as forced or child labour.
- promote the goal of zero harm to people and the environment and share in the responsibility for safety at work
- not offer Port Authority employees any financial inducements or any gifts or benefits
- assist Port Authority to prevent fraud, corruption and unethical practices in business relationships by reporting wrongdoing
- declare actual or perceived conflicts of interest as soon as such matters arise
- prevent the disclosure of confidential Port Authority information and protect Port Authority intellectual property
- use and access personal information only as authorised and only for a legitimate Port Authority purpose
- ensure the health, safety, security and welfare of individuals in connection with dealings with the Port Authority.
- seek guidance when uncertain about implementing the obligations on it from this Business Ethics Statement.

¹ 'Employees' refers to all individuals employed, appointed or otherwise engaged. This includes permanent, temporary and casual employees, as well as consultants, contractors and agency employees engaged to perform work for or on behalf of Port Authority.

Commitment to Ethical Conduct

Port Authority strives to maintain the trust and acceptance of our consumers and communities throughout our operations by considering the interests of the communities in which we operate and being mindful of our responsibility towards regional and urban precinct development.

Port Authority is committed to integrating sustainability across all operating functions with details provided in our published Sustainability Plan. This demonstrated commitment to long-term port sustainability is further highlighted by the Port Authority 2040 NetZero strategy and pathway.

Port Authority has zero tolerance for any form of bullying or harassment and holds employees, contractors and all stakeholders accountable for work standards and conduct.

Compliance and Breaches

Failure to comply with the requirement of this Business Ethics Statement could lead to:

- ramifications under its contracts with Port Authority (including potential termination)
- loss of future business opportunities with Port Authority
- financial and reputational damage
- investigation for corruption
- matters being referred for criminal investigation

Port Authority takes breaches seriously and will act to address any non-compliance. Suppliers are encouraged to maintain high standards of ethical conduct to avoid potential consequences.

What contractors and suppliers can expect from our employees

Port Authority employees will act in line with our Code of Conduct and behave in an ethical manner by conducting themselves professionally and consistently with the Port Authority values.

Port Authority employees will not engage in, or knowingly be a party to, fraud or corruption and will seek to identify and report any conflicts of interest.

Our employees will not accept or provide gifts or entertainment for personal gain.

Practical guidelines

Incentives, gifts, benefits and hospitality

Contractors and suppliers must not offer or give gifts to our employees, and there is no expectation from our employees that any gifts will be provided. Cash gifts or equivalent (for example, gift vouchers) are never acceptable.

Token gifts or employee participation in modest forms of hospitality are permitted only where:

- there is a clear underlying business purpose;
- it is in the normal course of business;
- it relates to the work of Port Authority; and
- it is disclosed by the employee when necessary, in accordance with internal procedures.

We acknowledge that judgement by both contractors and suppliers and employees needs to be exercised regarding the offer and acceptance of such gifts or hospitality, however to the extent any such gifts or hospitality are offered and accepted, they must be modest (both actual and in perception) and not be encumbered by obligation.

They must also not be offered at a time that could raise general concerns about conflicts of interest (for example, during a tender or contract negotiation period).

A register of gifts is maintained by Port Authority and our employees have an obligation to disclose gifts or offers of hospitality in accordance with the Code of Conduct and other Port Authority policies.

Conflicts of interest

All Port Authority employees are required to disclose any actual, perceived, or potential conflicts of interest. This includes conflicts of interest that can, or could, arise from personal relationships between our employees and staff of contractors and suppliers.

This expectation is extended to all contractors and suppliers of Port Authority. Suppliers must disclose any conflicts of interest related to their dealings with the Port Authority and resolve them in favour of Port Authority.

Confidentiality, intellectual property and privacy

Confidential information in any format must be treated as such and protected as appropriate.

The specific requirements of copyright laws and individual contracts must be adhered to.

All personal information collected relating to Port Authority personnel or while providing services to Port Authority must be treated in line with Port Authority's [Privacy Management Plan](#) and applicable privacy legislation (including but not limited to the *Health Records and Information Privacy Act 2002* (NSW) and the *Privacy and Personal Information Protection Act 1998* (NSW)).

Communication and cooperation

In line with applicable Port Authority and NSW Government procurement frameworks, policies, and codes of practice, Port Authority's contractors, sub-contractors and suppliers will maintain business relationships based on:

- open and effective communication
- respect
- trust
- a non-adversarial approach to dispute resolution.

Secondary employment and post-separation employment

Port Authority employees must obtain approval prior to entering into any secondary employment arrangement.

Secondary employment will not be approved if it has the potential to create an actual or perceived conflict of interest between the employee's role with Port Authority and their private interests.

Our employees are not to use either their position, government information, or intellectual property developed while being employed with Port Authority to secure secondary employment.

Contractors and suppliers must not offer our employees secondary employment which conflicts with their current duties.

Former employees who have dealings with Port Authority need to ensure that they do not seek, or appear to seek, favourable treatment or access to confidential information.

Public comment

Only certain Port Authority employees are authorised to publicly represent Port Authority.

Non-Port Authority employees must not make any public comment or statement that would lead anyone to believe that they are representing Port Authority or expressing its views or policies.

This includes comments and statements at public and community meetings, via the media, or when it is reasonable that comments or statements will become known to the public at large.

Our employees are not permitted to provide public endorsement, on Port Authority's behalf, of companies or their products.

Public interest disclosures

We do not tolerate corrupt conduct, maladministration, privacy contraventions, serious and substantial waste of public money and other forms of serious wrongdoing.

Individuals and corporations (and employees or officers of these corporations) providing services on behalf of Port Authority or exercising functions on behalf of Port Authority are classified as 'public officials' under the *Public Interest Disclosures Act 2022* (PID Act).

Contractors and suppliers who are public officials should report suspected or possible serious wrongdoing in the public sector, whether inside or outside Port Authority.

The PID Act protects public officials from reprisal or detrimental action when making a public interest disclosure in line with requirements of the PID Act. The PID Act ensures that public interest disclosures are appropriately dealt with.

For more information about public interest disclosures, please refer to Port Authority's [Public Interest Disclosures Reporting Policy](#) which contains information on how to make a report, including via Port Authority's whistleblower hotline.

Sustainability

The Port Authority is committed to reducing its environmental impact and maintaining environmentally responsible practices in its procurement of goods and services.

Suppliers are expected to adopt similar principles by:

- Minimizing waste and reducing emissions.
- Using resources efficiently and promoting the use of sustainable materials.
- Adopting environmentally responsible practices through the supply chain.
- Complying with relevant environmental regulations and standards.

Modern Slavery

Suppliers must ensure fair and ethical workplaces, free from any involvement in human rights abuses, such as forced or child labour.

They are responsible for conducting due diligence to identify and address any risks of modern slavery within their operations and supply chains.

Work Health and Safety

Suppliers must comply with all applicable work health and safety (WHS) legislation and standards.

They should implement and maintain effective WHS management systems to minimize risks and ensure that their employees and subcontractors are trained and equipped to carry out their duties safely.

Community and Reconciliation

The Port Authority recognises and acknowledges the Traditional Custodians of the lands across NSW on which we live and work.

We value the economic, social, and cultural contribution of Aboriginal and Torres Strait Islander peoples in NSW.

We support the economic participation and development of Aboriginal and Torres Strait Islander peoples and communities through encouraging procurement of goods and services from Aboriginal-owned businesses.

Information Security

Suppliers and those 3rd parties accessing Port Authority data must acknowledge and comply with the Port Authority's information security requirements to protect the confidentiality, integrity, and availability of Port Authority data.

This includes adhering to all relevant cyber security laws, regulations, and standards, and implementing appropriate security measures. Suppliers are expected to demonstrate a strong cyber security governance and culture, and where relevant to its services to Port Authority, must assist Port Authority in meeting its obligations under the *Security of Critical Infrastructure Act 2018 (Cth) (SOCi Act)*.

Physical Security

Suppliers must comply with physical and personnel security obligations as part of the organisation's broader Risk Management Program (RMP), in accordance with the SOCi Act and *Maritime Transport Offshore Transport Facilities Security Act 2003 (MTOFSA)*. This includes measures to prevent unauthorised access, damage, or interference with critical infrastructure assets.

Further assistance

If you have questions regarding this Business Ethics Statement, please contact your Port Authority contract representative or the procurement contact.

Related Documents

This Business Ethics Statement should be read in conjunction with Port Authority's:

- [Code of Conduct](#): the general business ethics and standards of professional behaviour applicable to directors, employees and contractors of Port Authority.
- [Supplier Code of Conduct](#)
- [Public Interest Disclosures Reporting Policy](#)
- [Privacy Management Plan](#)
- Fraud and Corruption Policy

Approval and Review

This Policy has been approved by the Board of the Port Authority of NSW.

The Policy Owner is responsible for ensuring:

- This policy is updated every 24 months or as necessary; and
- Compliance to policy is achieved.

Version Control

The Document Owner will review this Policy every two years, in consultation with relevant stakeholders.

The next date for review is 8/09/2027

Document History

Version	Document Control	Name	Role	Date
0.1	Drafts	Guy Elliott	Senior Manager Procurement	26/08/2025
1.0	Approval		Board of the Port Authority of New South Wales	08/09/2025