

Code of Conduct

1. HAVING A CODE OF CONDUCT IS IMPORTANT

1.1 Reason

At BINGO we are serious about operating ethically. This documented Code of Conduct sets out how we expect you will conduct business while working within, and representing, BINGO.

1.2 Application

This code applies to all of BINGO and its subsidiary and associated companies (from here on referred to as BINGO) and operates in conjunction with BINGO's values and our policies and procedures relating to you and your role.

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 BINGO's expectations, please speak with your manager or one of the People & Culture team. When in doubt, to help with your compliance with this code you should ask yourself the following questions:






1. Is what I am doing legal?
2. Are my actions in the best interest of our customers, shareholders, community and my colleagues?
3. Would I be comfortable reading about this in the newspaper, or other social media?
4. Would I be happy if the actions were done to me or a loved one?
5. Would I be comfortable telling my family and friends what I've done, both now or in the future?

This Policy applies to work and work-related activities both at and away from BINGO premises. It also applies to interactions that you have with customers and the communities in which we operate, including our dealings with any other person or company on behalf of BINGO. These interactions may be face to face, via technology, social media platforms and the like.

2. OUR VISION 'PUSHING FOR A WASTE FREE AUSTRALIA'

Becoming waste free won't be easy, but it's the single most important thing we have to do, to ensure that no resource is wasted. That's why at BINGO, enough is never enough. Our people are a rare breed, pushing each other onwards to do more and do better. They've driven us forward, kept us fresh. They're GOgetters! You are a GOgetter! We believe in having the courage to challenge the norms, to work together for the betterment of our world. To have a lasting positive impact, we all must change what we're doing and how we're disposing of waste. When we improve, we push each other to the next level. We don't say what others want to hear, we do what we know is the right thing to do to achieve our Vision and make Australia a better place for generations to come.

3. OUR VALUES ‘THE BINGO WAY’

	<p>We put the safety of ourselves, our teammates and community, and the health of the environment first. We take responsibility for our own safety and the safety of those around us. We make a commitment to achieving Zero Harm and getting everyone Home Safe, each and every day.</p>
	<p>We work honestly, ethically and fairly. We abide by all BINGO policies and procedures to protect our safety and the safety of others in our workplace.</p>
	<p>We believe that there are only solutions, never problems. We strive to learn and grow so that we can better serve our customers.</p>
	<p>We aim to be great, not good. We adopt the best ideas and make them happen.</p>
	<p>We are a company built on family values. We know that talent wins games, but teamwork and intelligence wins championships.</p>

4. THE BINGO BASICS

Our BINGO BASICS apply to all jobs, no matter how big or small, and are in place to support compliance with our ZERO HARM RULES

- Comply with all road rules– Bingo drivers must maintain an appropriate licence and Bingo carry out regular licence checks to ensure drivers are operating within the law. Drive defensively.
- Drivers must be fit for duty, drug and alcohol free – Bingo has a ZERO TOLERANCE to drug and alcohol abuse.
- 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.
- Comply with Chain of Responsibility (COR) laws
 - o All loads must be strapped and tarped appropriately – Bingo is committed to being an industry leader in ensuring our loads are covered and restrained in accordance with load restraint standards and road rules.
 - o Ensure driving hour restrictions are observed to minimise fatigue risks
 - o All loads shall be within mass limits
 - o Ensure all equipment is kept in good condition, free from defect/damage, neat and tidy – Bingo drivers are responsible for completing vehicle pre-starts and reporting all defects.
- 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.
- Incidents, near misses and hazards must be reported immediately to your supervisor/manager – All incidents, near misses and hazards are reported and investigated with learnings shared.
- Always be courteous and respectful, to each other, our neighbours, our customers and members of the public
- Keep stockpiles tidy and control height
- Sites must be organised, clean and tidy, and dust and litter must not leave site
- Operations to cease in high wind
- Water entering site drains to be clean and clear
- Ensure environmental monitoring and risks are controlled, e.g. noise and vibration
- Avoid tracking of mud and dirt
- All pre starts and checklists are to be completed and documented

5. OUR ETHICAL STANDARDS AND POLICIES

5.1 Competing fairly and ethically

At BINGO, we strive to compete ethically and respect competition laws. You should be mindful that some of our customers are also our competitors. When we interact with competitors or potential competitors, we must only discuss matters that relate to that competitor *as a customer*. We must not share commercially sensitive information such as market rates, tenders or projects with our competitors.

5.2 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 BINGO, 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 BINGO. To safeguard the confidence of BINGO's key stakeholders and BINGO'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 BINGO's best interests or would be likely to negatively affect BINGO'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 a senior manager and there is a record placed on file. 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, a senior manager or the Company's legal department as soon as possible.

5.3 Opportunities, Benefits and Ownership of Work

You must not improperly use any BINGO or customer property (including intellectual property), or information, or opportunities arising from these to gain personal advantage for yourself or for another party, or to cause detriment to BINGO or our customers.

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

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

5.4 Anti-bribery and Gifts

A number of countries, including Australia, have strict laws against bribery and corruption. Importantly, our anti-bribery laws apply to things done in other countries (ie wide-reaching extra-territorial effect). Whilst BINGO operates in Australia, we may also engage with service providers and suppliers who are based offshore. We must comply with and uphold all laws against bribery, corruption and related conduct applying to BINGO in all the jurisdictions where BINGO operates and interacts. BINGO will report any actual or intended bribery or corruption to the appropriate law enforcement agencies.

Accordingly, BINGO has a strict policy not to offer secret commissions or bribes to further its business interests. Care should also be taken when operating with overseas suppliers where an additional payment is requested to facilitate and expedite a particular process. Depending on the circumstances, facilitation payments such as these 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. To ensure full transparency, all payments generated, either received or to be paid, must be processed and approved via BINGO's established administration and finance processes. 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. You 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.

At BINGO 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, a senior manager, legal counsel or other relevant advisor.

5.5 Dealings with Politicians and Government Officials

All dealings with politicians and government officials which relate to BINGO and our 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.

5.6 Freedom of Association and Collective Bargaining

BINGO respects your rights to join, form or not to join a labour union without fear of reprisal, intimidation or harassment. Where you are represented by a legally recognised union, we are committed to establishing a constructive dialogue with their freely chosen representatives. BINGO is committed to bargaining in good faith with such representatives.

5.7 Confidentiality

In the course of BINGO'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 BINGO, or acting on behalf of BINGO, confidential, even after you leave or cease your engagement with BINGO.

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 confidential information inadvertently comes into your possession it should be returned/notified immediately and all electronic copies deleted.

If you are required by an authority to provide confidential information which has not been otherwise authorised by the Group Executive of the BINGO division in which you operate, you must notify BINGO's legal department.

5.8 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.

5.9 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 and never threatening or engaging in violent behaviour such as fighting or assault. This applies to all communication channels within BINGO including emails, TEAMS chat function, SMS and two-way communication devices in trucks and recycling centres.

BINGO 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 our policies relating to Diversity, Equity, Inclusion & Belonging and Discrimination, Bullying & Harassment.

BINGO is committed to ensuring the highest quality of service is provided to its customers and clients at all times. BINGO makes decisions regarding suppliers and contractors on merit and a commercial basis. BINGO collects information about its competitors and others in a lawful manner.

5.10 Environment, Health and Safety

BINGO considers both the environmental impacts and benefits of its decisions and business activities, and continuously seeks better environmental outcomes for all of its business activities.

BINGO is committed to ensuring the health and safety of all GOgetters, consultants, contractors and visitors to our workplace and any other persons who BINGO works with. You must comply with the laws and regulations that apply to BINGO and its operations.

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.

Our commitment to Zero Harm is reinforced by our policies and procedures covering safety and environmental practices. You are required to stay up to date with these policies and procedures, and any supporting training, to remain up to date with the requirements of their roles.

5.11 Protection of and Use of the Company's Assets and Property

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

You must not use BINGO's assets or property for personal purposes except in accordance with any BINGO policy or approved arrangement. You must return Company assets and property immediately upon request by BINGO.

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

5.12 Compliance with Laws and Regulations

BINGO is committed to complying with the laws and regulations of the countries in which we operate or do business in.

You must comply with all laws and regulations relating to BINGO, 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 that creates a breach of, any law or regulation or requirement. All actual or potential breaches must be reported immediately to BINGO's legal department, or your manager. You will be held personally accountable if you break the law while working for BINGO (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 BINGO.

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

5.13 Compliance with Reasonable Directions

You are expected to comply with reasonable directions given by your manager or a delegated authority.

A direction is considered reasonable if it:

- Is lawful and not in breach of any legislation or regulations
- Is directly related to your job duties
- Is not discriminatory or harassing in nature
- Does not require you to act in an unsafe manner

These directions may include, but are not limited to, tasks related to your job duties, attendance and punctuality, and adherence to company policies and procedures.

Some examples of the types of directions that might be given by BINGO to you include a direction to:

- participate in a workplace investigation;
- undertake a medical examination for the purpose of assessing fitness for work;
- comply with work health and safety laws;
- stay away from work or work from home to prevent the risk of exposure to, or spread of a contagious illness;
- report misconduct;
- prioritise projects in a particular way; and
- adhere to a dress code.

You are expected to comply with directions in a timely and efficient manner, and to raise any concerns or issues with the direction in a timely manner with your manager or People and Culture representative.

If you fail to comply with reasonable directions you may be subject to disciplinary action, up to and including termination of employment.

It's important to keep in mind that in Australia, under the Fair Work Act 2009, employees have the right to refuse to carry out work that is unsafe or dangerous.

5.14 Merit based Recruitment Process

When recruiting and appointing into roles BINGO operates a merit based selection process which means choosing the best person for the job, based both on candidates capability and their potential for development. The primary consideration in a selection decision is based on an assessment of suitability using a selection process based on the Success Profile for the role. Applicants for employment are evaluated by BINGO on merit in accordance with their skills, qualifications and abilities, and having regard to BINGO's operational needs.

5.15 Maintaining accurate business records

Every document created at BINGO is a business record, this includes documents like weighbridge tickets, timesheets and invoices. Business records must be complete, accurate and timely. This is important to ensure that we are able to rely on our business records to communicate our company's financial and operational status, especially when communicating with regulators.

We all need to be aware that in some cases, particularly as the law relates to health, safety and the environment, we can be personally liable for providing misleading records or making misleading comments to regulators.

6. TAKING ACTION

You are encouraged to raise any concerns of improper conduct with your Supervisor, Senior Manager or the People & Culture team.

6.1 Speak Up

We want you to be confident that you will be supported to 'do the right thing'. You are encouraged to report any actual or suspected unethical behaviour including excess waste or breach of BINGO's codes and policies to your manager, a senior manager, or the BINGO's legal department or any other contact nominated by BINGO. Matters raised will be addressed, including full investigations undertaken where required.

If you have concerns regarding raising an issue of concern through internal channels refer to our Speak Up policy which **explains how you can raise concerns about suspected misconduct in confidence without fear of retaliation.**

BINGO 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.

6.2 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. BINGO regards the raising and settling of grievances as an important part of a culture of continuous improvement. See also our Grievance Resolution Policy. GOgetters who bring genuine complaints and/or make genuine reports must not be victimised for doing so.

6.3 Need Support?

You are welcome at any time to ask your manager or People and Culture representative for support in dealing with a complaint, concern or otherwise in relation to the matters covered by this policy or the Grievance Policy.

You can also access SONDER, BINGO's Employee Wellbeing Support Service at any time. Sonder is a professional, confidential counselling service provided by independent counsellors for employees and their immediate family members free of charge.

7. POLICY BREACHES

The highest standards of corporate conduct are critical to BINGO'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 BINGO as central to our integrity.

Compliance with this code our 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.

To the extent that this Policy imposes obligations on BINGO, it does not form a contractual term, condition or representation.

8. PUBLICATION OF THIS POLICY

This policy will be made available to all GOgetters and will be available on the Company's website.

9. KEY TERMS

9.1 GOgetter

GOgetter is an inclusive term for BINGO employees. This captures both employees at common law and persons who are captured by the extended definition of 'employee' which is: 'If a person works under a contract that is wholly or principally for the labour of the person, the person is an employee of the other party to the contract'. GOgetters include -

- Permanent full-time and part-time employees
- Employees on a fixed term or fixed task contract
- Casual employees
- Temporary employees

9.2 Workplace

Any place where work is carried out for BINGO and includes any place where a GOgetter goes, or is likely to be, while at work. This may include offices, factories, shops, construction sites, vehicles or other mobile structures on land or water, as well as working from home.

9.3 Subsidiary and Associated Companies

- Bingo Pty Ltd
- Bingo (VIC) Pty Ltd
- Bingo Recycling Pty Ltd
- Bingo Bins Pty Ltd
- Bingo Waste Services Pty
- Toro Waste Equipment
- Dial-A-Dump (EC) Pty Ltd
- Djurwa Pty Ltd
- United Hire Group Pty Ltd
- BINGO Queensland Pty Ltd
- Sheldon Resource Recovery Pty Ltd