

10 April 2025

Code of Conduct



SYD

Welcome to our Code of Conduct

A note from the CEO

At Sydney Airport, our purpose is to be a leading global airport connecting Australia through our service, efficiency and innovation.

Our success in achieving that purpose will be defined by how we conduct ourselves every day, both collectively and individually.

If our purpose and values are the ideas and beliefs that guide us towards our goal, then our Code of Conduct is how we achieve it.

It is a tool that helps bring our values to life and allows us all to meet the high standards and expectations set by ourselves and our multiple stakeholders.

It also serves as a foundation for our company policies, procedures, and guidelines, all of which support our values.

Our future is growth. As we set ourselves up and prepare for that future, we must ensure that our actions, words, and behaviours allow us to operate ethically and responsibly now.

Please familiarise yourself with our Code of Conduct so that we can continue the great momentum we have with a collective sense of responsibility, confidence and security in how we work and behave.

Scott Charlton
Chief Executive Officer



When it applies

This Code applies to anyone who is employed by, and/or works for or with, SYD including employees, directors, all contractors and consultants.

It applies in our daily roles and whenever we are representing SYD including outside the office and outside working hours.

Our responsibilities

We all have the responsibility to understand the commitments outlined in this Code, apply them using common sense and ask questions if anything is unclear.

People leaders have an increased responsibility to role model the behaviour we expect under our Code, to promote speaking up and to ensure that the people they lead feel safe to raise any issues or concerns.

This is our code

It defines the commitment all of us make every day. Each of us contributes towards reaching our shared aspirational goal of 2bn passengers by 2040.



Keep each other safe & well

This means that we:

- attend for duty fit and able to safely perform our tasks
- always report near misses, hazards, safety and environmental incidents
- immediately report all security matters, crimes and suspicious events
- willingly and transparently participate in any investigations
- take care of our health, safety and wellbeing and the health, safety and wellbeing of others
- respect and uphold human rights and do not participate in any form of unlawful discrimination, harassment, bullying, victimisation or vilification
- are an equal opportunity employer and seek to ensure recruitment and selection activities are based on merit

We are all safety leaders.

We act inclusively and treat people with respect.



Do what you say

This means that we:

- always do our best and take accountability and responsibility for our decisions and actions
- we are clear on our strategy and maintain focus by prioritising our time and effort to achieving our goals
- say what we will do and then we execute it in the best possible way
- work together to achieve the best outcome
- continue to build trust and dependability with our passengers, stakeholders & the community
- make excellence a habit

We take accountability, commit with clarity and always deliver.



Always do the right thing

This means that we:

- approach all dealings and decision-making ethically, openly and honestly
- know and comply with all laws, regulations, policies, procedures and contractual obligations as they apply to our roles
- disclose, and take all reasonable steps to avoid, any conflicts of interest or anything that may look like a conflict of interest
- have courage to speak up and we do not conceal breaches
- never approve our own transactions or those of friends or relatives
- keep our information secure, we do not disclose sensitive or confidential information and we do not use SYD's systems inappropriately
- behave professionally and appropriately at work and work-related functions
- are mindful that actions we take in our personal capacity (e.g. on social media) can reflect on SYD and its relationships with stakeholders

We act with integrity.

We collaborate and have courageous conversations.

This is our code

Deliver for our passengers

This means that we:

- strive for best in class service, at the same time ensuring we get passenger service basics right
- reject all forms of slavery and human trafficking
- respect the privacy of our passengers and stakeholders and handle all personal information with care and in accordance with privacy laws and our policies
- comply with competition and consumer laws and understand the impact of dealings on our passengers and other stakeholders
- seek to ensure our assets are maintained in good working order, are repaired when required
- support a diverse and inclusive workplace in which we treat each other, our passengers and our stakeholders with dignity, respect and fairness
- treat people equitably by making adjustments to accommodate disabilities and other personal circumstances where it is practical and safe to do so

We provide an exceptional service and experience for our passengers.

Focus on tomorrow & today

This means that we:

- plan for success—we are not reactive in our decision making, instead we take a long term view that is consistent with our strategy
- manage and enhance the natural environment of the airport
- manage our resources, minimise waste and work towards achieving net zero carbon emissions by 2030
- challenge respectfully, proactively seeking to improve and find better ways of working
- seek to ensure that no business activity is conducted in a way that compromises safety or significantly impacts the environment and we work with our communities to create shared value
- understand the opportunities and evaluate risk
- learn, evolve, and grow

**We drive sustainable performance.
We promote curiosity, challenge the status quo and continually innovate.**



Compliance with our commitments

Who can I speak to?

You should feel safe to raise any known or suspected breaches or concerns with your people leader, a member of the Company Secretariat team, Legal or HR team or your Leadership Team member.

Concerns can also be raised anonymously any time via HALO, SYD's external whistleblower reporting hotline, 24 hours a day, 7 days a week (you can access SYD's Whistleblower Policy on our website).

How are breaches dealt with?

They're all treated seriously and investigated. Substantiated breaches or failing to report a breach may result in disciplinary action, which may include a formal warning, suspension or termination of your employment contract or other contract of engagement with SYD. A breach of the law may result in civil or criminal action and/or penalties.

Our Board and Board committees review all material incidents.

Compliance, training and review

This Code has been approved by our Board and compliance with it is mandatory. Regular training will be provided. Annual declarations of compliance will be required by all employees. This Code will be reviewed as required and at least every two years to ensure that it remains effective. Amendments will be approved by our Board except for minor or administrative updates, which may be approved by the Company Secretary.

For more information and specific policy obligations refer to:

- Belonging and Inclusion Action Plan
- Competition and Consumer Law Compliance Policy
- Environment Policy and Management System
- External Communications and Media Policy
- Fraud and Corruption Prevention Policy
- Gifts and Benefits Policy
- Human Rights Policy
- Information Security Management System (ISMS) suite of policies
- Travel and Expense Policy
- Information Technology Use and Workplace Surveillance Policy
- Safety Management System
- Security Awareness Guide
- Sustainability Policy
- Safety Policy Statement
- Social Media Policy
- Supplier Code of Conduct
- Whistleblower Policy
- Guide to managing conflicts of interest
- Respect at Work Policy
- Privacy Policy
- Procurement Policy