

SYD

Sydney Airport
Code of Conduct

7 December 2020

Message from the CEO



For over 100 years Sydney Airport has been an important part of the economic and social fabric of Sydney and New South Wales.

As Australia's most important infrastructure asset, what we do and how we behave, individually and collectively, matters.

Our purpose and values set out the principles and behaviours that we aspire to in order to meet the expectations of our stakeholders, and realise our potential as a business.

Our Code of Conduct builds on our purpose and values, and asks for your commitment to shared standards in your decision-making and how we do business.

I would ask that you read and understand our Code of Conduct, and join me in upholding it.

A handwritten signature in black ink, which appears to read 'Geoff Culbert'. The signature is fluid and cursive.

Geoff Culbert
Chief Executive Officer

Our Code of Conduct

Our Code of Conduct (Code) defines the commitment that each of us makes as to how we will do business at and for Sydney Airport. Guided by our purpose and values, it helps us to assess how to do the right thing in our roles at Sydney Airport each and every day.

Our purpose and values

Our purpose is:

“to make Sydney proud every day”

Our values are:



Always do the right thing

Integrity and honesty is at the heart of everything we say and do



Have each other's back

Working at SYD is a team effort. We care. We keep each other safe and well



Do what you say

We challenge respectfully then collaborate to get to 'Yes'. We commit and deliver



Think like our customers

We walk in their shoes and always strive to improve

The commitments we make

When we accept a role at Sydney Airport, each of us commits to:

- Working safely and responsibly
- Behaving ethically, professionally and lawfully
- Respecting all stakeholders and customers and treating them fairly
- Protecting our resources, assets and information

This Code doesn't cover every conceivable circumstance. Each of us has a responsibility to understand the commitments outlined and to apply them, using common sense. If anything is unclear to you, you should discuss and clarify it with your colleagues, manager or the legal team. It may help to ask yourself these questions:

- Does this feel like the right thing to do?
- Would this make Sydney proud and does it align with our values?
- What would a customer, a SYD investor, the community, my manager, my colleagues or my family think?
- Could this negatively impact on Sydney Airport's reputation?
- Is there a policy on this and have I read and understood it?

Work safely and responsibly

- We prioritise safety and security
- We all play our part in ensuring 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
- We promote a safe, healthy, secure and environmentally responsible workplace

This means we:

- Attend for duty fit and able to safely perform 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
- Follow all safety, environmental and security instructions, policies and procedures
- Take care of our health, safety and wellbeing and the health, safety and wellbeing of others
- Never harass, bully or intimidate anyone
- Consider the potential impacts of our actions and decisions on safety, the environment and sustainability, ensuring that they align with business objectives

'We have each other's back'



Behave ethically, professionally and lawfully

- We approach all dealings and decision-making ethically, openly and honestly
- We act with integrity and never engage in conduct that may cause damage to Sydney Airport's reputation
- We know and comply with all laws, regulations, policies, procedures and contractual obligations as they apply to our roles
- We disclose, and take all reasonable steps to avoid, any conflicts of interest* or anything that may look like a conflict of interest

This means we:

- Do not engage in misleading or deceptive conduct
- Do not act illegally or conceal breaches of our policies
- Are mindful that actions we take in our personal capacity (e.g. on social media) can reflect on Sydney Airport and its relationships with stakeholders
- Never authorise or become involved (directly or indirectly) in bribery, corruption, facilitation payments or secret commissions or facilitate money laundering
- Ensure that all donations, partnerships and sponsorships are transparent and documented and disclosed in accordance with our relevant policies
- Declare to our manager the nature of our relationships with stakeholders (e.g. when recruiting, participating in a tender process or engaging contractors or any time when a conflict of interest or potential conflict of interest arises or could be seen to have arisen)

Behave ethically, professionally and lawfully / continued

- Seek approval from our manager and HR prior to commencing any outside employment, memberships of groups, organisations or boards or any voluntary work that may cause a conflict of interest with or otherwise impact on our time or ability to perform our duties at Sydney Airport
- Disclose to HR any close personal relationship with another Sydney Airport employee where there are direct or indirect reporting lines, and/or actual or possible conflicts of interest between the roles
- Only accept or offer gifts and benefits in line with our policies
- Never approve our own transactions or those of friends or relatives
- Ensure any expenditure is allowable and reasonable, properly recorded and reported
- Understand and acknowledge that if we participate in any professional associations, industry bodies, trade associations, charitable or service organisations, in a personal capacity, there is no specific or implied Sydney Airport endorsement of the activity

**A 'conflict of interest' is any circumstance where an employee's personal interest conflicts with that of Sydney Airport or casts any doubt on the employee's ability to act appropriately regarding the best interests of the company*

'We always do the right thing'



Respect all stakeholders and customers and treat them fairly

- **We respect and uphold human rights and do not participate in any form of unlawful discrimination, harassment, bullying, victimisation or vilification**
- **We maintain fair relationships with our customers and suppliers**
- **We are an equal opportunity employer and create a diverse and inclusive workplace in which we treat each other, our customers and our stakeholders with respect, dignity and fairness**

This means we:

- Reject all forms of slavery and work with stakeholders to ensure that slavery and human trafficking aren't taking place at the airport or in our supply chain
- Treat people equitably by making adjustments to accommodate disabilities and other personal circumstances where it is practical and safe to do so
- Respect and value people and never unlawfully discriminate
- Ensure recruitment and selection activities are based on merit
- Respect employees' privacy and the privacy of our customers, stakeholders and investors and we handle all personal information with care and in accordance with privacy laws and our policies
- Comply with competition and consumer laws and understand how they affect our dealings with competitors, suppliers and customers and immediately report to the General Counsel any attempted or actual anti-competitive behaviour

'We think like our customers'



Protect resources, assets and information

- We use our equipment, systems and property in line with our policies
- We manage our resources and minimise waste responsibly in line with our environmental and sustainability statements
- We protect confidential, personal and commercially sensitive information from misuse and unauthorised disclosure to third parties in line with our obligations
- We manage and enhance the natural environment of the airport

This means we:

- Always do our best and take accountability and responsibility for our actions, ensure our assets are secured against theft and are properly stored, maintained in good working order and repaired when required
- Do not use Sydney Airport's systems to view, download or send inappropriate material
- Ensure all confidential information is kept secure (i.e. only shared with other employees if they need it to perform their duties and not discussed or read in unsecure public places)
- Do not disclose sensitive or confidential information to external parties unless the owner of the information has consented, appropriate confidentiality arrangements are in place and there is a need for them to know the information
- Follow all policies, standards and processes relating to information security, such as protecting digital identity, storing information, transmission and disposal of information, and maintaining passwords
- Immediately report any known or suspected breaches of privacy or information security
- do not speak to the media unless authorised to do so and refer all media enquiries to the Corporate Affairs Team
- Do not disclose, use or take advantage of information obtained in the course of official duties, including if/when we cease to be employed by Sydney Airport
- Do not engage in, or facilitate others engaging in, insider trading and only trade in securities in accordance with our policies
- Notify the General Counsel and Company Secretary of any information that we believe may be material or require disclosure to investors

'We do what we say'



Compliance with our commitments

How are breaches dealt with?

Breaches of this Code or failing to report a breach may result in disciplinary action and may include termination of employment or contract. Employees are asked to report any concerns about known or suspected breaches of the Code to either their manager, Sydney Airport's General Counsel, the Human Resources General Manager, the Head of Internal Audit and Risk or the Manager, Corporate Governance. Concerns can also be raised anonymously any time via HALO, Sydney Airport's external whistleblower reporting facility, 24-hours a day, 7 days a week (you can access [Sydney Airport's Whistleblower Policy here](#)). The Sydney Airport Limited Board and/or the Audit Committee reviews all material incidents or breaches of this Code in a fair, impartial and objective manner, including the results of any investigations.

Outcomes of a breach will depend on its severity and may include formal warnings, suspensions or termination of contract. Where there has been a breach of the law, civil or criminal action may result.

Compliance, training and review

This Code has been approved by our Board and compliance with it is mandatory for all employees, contractors, consultants and directors. 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 and to assess whether any changes are required. Any amendments to this Code must be approved by the Sydney Airport Limited Board except for minor or administrative updates and amendments, which may be approved by the General Counsel & Company Secretary or the CEO.

For more information and specific policy obligations refer to:

- Diversity Policy
- Competition and Consumer Law Compliance Policy
- Continuous Disclosure and Communication Policy
- Environment Policy and Management System
- External Communications and Media Policy
- Fraud and Corruption Control Policy
- Gifts and Benefits Policy
- Human Rights Policy
- Information Security Management System (ISMS) suite of policies
- Information Technology Use and Workplace Surveillance Policy
- Safety Management System
- Security Awareness Guide
- Sustainability Policy
- Sydney Airport Safety Policy Statement Securities Dealing Policy
- Social Media Policy
- Supplier Code of Conduct
- Whistleblower Policy

'We make Sydney proud every day'