



Walker Code of Conduct

In this Code, "**Walker**" means Walker Corporation Pty Limited (ACN 001 176 263) as trustee for the L A Walker Family Trust (ABN 92 134 623 291), Walker Group Holdings Pty Limited (ACN 001 215 069) and all their respective Australian domiciled controlled and related entities.

Purpose

Walker recognises that the conduct of our people is integral to the sustained success and reputation of Walker. This Code provides a framework to ensure that all Walker Personnel are held to the highest professional and ethical standards.

This Code outlines the standards and requirements to be complied with in our day-to-day business operations. It also sets out the behaviours and expectations that we must always behave courteously, respectfully and professionally. It is intended to facilitate good decision making and ethical conduct.

The principles upon which Walker expects and encourages its people to operate under are as follows:

- We act with honesty, integrity, and due skill, care and diligence;
- We comply with laws and our policies;
- We do the right thing;
- We respect confidentiality and do not misuse information;
- We value and maintain our professionalism;
- We work as a team;
- We manage conflicts of interest responsibly;
- We are authentic and genuine in our approach; and
- We treat everyone fairly, equitably (having regard to gender, diversity and inclusion) respectfully and on an inclusive basis

Breaches of this Code will be investigated and may result in consequences set out in this Code.

Who does this Code apply to?

This Code applies to all entities and persons including directors, officers, employees, contractors, or consultants, who are employed by, act for, or represent Walker (**Walker Personnel**).

This Code applies at all times when Walker Personnel are undertaking Walker work or representing or associated with Walker including working off-site or at after hours functions. It also extends to social media activity.

Personal and Professional conduct

Behaviour in the Workplace

All Walker Personnel have the right to feel safe, valued and respected at Walker.

We aim to provide a safe, injury free workplace, free from discrimination, harassment, victimisation, vilification, bullying and any other inappropriate workplace behaviour. We will not tolerate any intimidation, or abusive or unwelcome behaviours that seek to intimidate, insult or humiliate others based on gender or gender identity, sexual preference, marital status, carer responsibilities, disability, religion, culture, racial origin, political preference, trade unionism, veteran status, pregnancy, age or other individual attributes.

Sexual harassment and harassment on the basis of sex will not be tolerated in the workplace.

If you experience or witness any such behaviours in our workplace, in the first instance, you should raise this with your manager as soon as possible. If for any reason you are unable to do this, then these matters should be raised with either the Chief Financial Officer (CFO) or the Chief Operating Officer (COO).

It is everyone's responsibility to raise concerns regarding improper conduct or any possible breach of this Code or law. You should speak to your manager if you feel under pressure to act in a way inconsistent with this Code, or which conflicts with our policies.

If you do not feel able to use these reporting channels due to the nature and/or seriousness of any improper conduct or you may wish to remain anonymous, there are a number of channels for you to make a report of suspected misconduct under our [Whistleblower Policy](#).

Every person working at Walker is valued and integral to our culture and success. We consider all qualified applicants for employment regardless of race, colour, religion, sexual orientation, gender identity or national origin, abilities or family or carer obligations.

For more information on this, please see our [Workplace Bullying, Harassment and Anti-Discrimination Policy](#).

Workplace Health & Safety

Safety is paramount at Walker, and we are committed to providing a safe workplace and culture for all Walker Personnel, suppliers and visitors. All Walker Personnel have a responsibility in making sure that our work environment is safe and free from hazards, which also includes reporting any potentially unsafe operations.

All Walker Personnel are required to follow applicable site safety policies & procedures and report any incident which generates an actual or potential injury. Any potential hazards, injury, or unsafe work conduct is to be brought to the attention of your line manager or relevant management representatives immediately.

You must also ensure that you are fit and able to carry out your responsibilities when you come to work, and you should not come to work or attend any work function, during or after business hours, under the influence of drugs, alcohol or any other substance that could hinder your performance, create a safety risk or reflect adversely on our reputation.

For more information on these policies, please see our [Workplace Health and Safety Policy](#), and our [Drugs & Alcohol Policy](#).

Sustainability (social and environmental)

Walker is committed to operating in a socially and environmentally responsible manner and takes pride in supporting the communities in which it operates.

All Walker Personnel are responsible for understanding the relevant social, environmental and governance guidelines in regards to the community and environment. If you become aware of any action that is not responsible and/or breaches applicable laws and regulations, further advice should be sought through the Legal Team or your manager. Alternatively, it could also be reported via the procedures set out in the [Whistleblower Policy](#).

For more information on our commitment to sustainable operations, please see our [Environmental Policy](#).

Confidential and proprietary information and privacy

Protecting Walker's confidential and proprietary business information, good will and relationships with clients, customers and key employees are matters of utmost concern to Walker and are fundamental to the success of its business operations.

Theft (or non-authorized sharing) of trade secrets, solicitation of clients and customers, employee disloyalty and breaches of fiduciary duties can cause irreparable loss to Walker and will be subject to appropriate disciplinary action.

You must not divulge or make use of any Walker confidential or proprietary information or make use of any knowledge gained in relation to that information during or after termination of your employment, except in the proper course of your duties or with prior approval in writing from the CEO. This includes not sharing or discussing confidential information in public places or with other employees who are not entitled to know such information.

You must not use Walker's confidential information or proprietary information otherwise than for the proper performance of your duties for any purpose including for financial gain and/or to the detriment of Walker, our customers, suppliers or partners and other stakeholders. If, at any time including on termination of employment, an employee breaches their duty in this regard, we will consider taking legal action to protect our interests and those of our customers, suppliers and partners. This action may include seeking an injunction restraining the employee (or ex-employee) from committing any further breach, or a claim for damages in respect of the loss suffered by Walker. This may also involve termination of your contract.

Confidential information must be kept secure, and care must be used at all times including when taking it out of the workplace.

You must not share or use (either during or after termination of your employment) any proprietary or intellectual property owned or controlled by Walker except in the proper course of your duties.

Managers must ensure their personnel, and any contractors or temporary staff working with them, are aware of their information security responsibilities and any associated procedures, guidelines and standards.

Walker takes its privacy and protection of personal information obligations seriously including compliance with all privacy laws. All Walker Personnel must make sure they are aware of the requirements contained in Walker's Privacy Policy and comply with those requirements.

If you are unsure whether disclosure of information is authorised, seek advice from your manager.



Walker is committed to protecting personal and health information in line with the applicable legislation. All Walker Personnel must take reasonable steps to keep personal information secure and protected from misuse, loss or unauthorised access, modification or disclosure.

Fraud and corruption

We have zero-tolerance for bribes, kickbacks, and the taking or making of improper financial or other advantages. All Walker Personnel must not under any circumstances, whether directly or indirectly, engage in conduct that constitutes corruption. [The Fraud and Anti Corruption Policy](#) sets out your responsibilities with regard to these, which include payments to government officials in the form of cash, gifts, entertainment, or other benefits. You must report any instance of actual or suspected fraud or corruption in accordance with the Fraud and Anti Corruption Policy.

Walker Personnel must not accept any payment or gift of any kind in return for any favour or special treatment by a tenant, customer or third party such as a supplier. If you are offered anything of value in such circumstances, you must report it immediately to your manager or the COO.

Working with external parties:

Speaking on behalf of Walker

At Walker, we are proud of our achievements and successes. However, the sharing of news and making media statements and official announcements can be commercially sensitive, and must be left to those who are authorised to do so. If you are asked by someone to comment on any aspect of the Walker business, you should refer them to the Head of Communications, Marketing and Brand - Corporate.

You should not speak on behalf of Walker to any media outlets or representatives, market analysts or any other third party unless you have specific authorisation to do so from a member of the Executive.

If you are authorised to speak on behalf of Walker by a member of the Executive, you must ensure that everything you say can be verified or backed up. If you are presenting materials for public communications, you should make sure that the materials comply with any legal requirements, and accurately and fairly reflect the matters they relate to and are reviewed and approved prior to publication.

Social Media

Social media can be a powerful channel of communication to others about our company and what we do. Social media is any online media and communities, social networks, platforms, video or photo sharing sites, as well as chat rooms, online discussion groups or forums, blogs and internet sites that facilitate the publishing of user-generated content or commentary. It is important that these channels are used properly and effectively.

Walker's Social Media Guidelines provide critical information regarding Walker's approach to social media in the business, and your responsibilities as a Walker employee. You must adhere to these guidelines in performing your employment duties.

Business Use of Social Media

You may only create a Walker business-related social media account by first obtaining the approval of the CEO or the Head of Communications, Marketing and Brand - Corporate. All content posted to any Walker-related social media account (including content that is re-tweeted or shared from

another account) must be approved by the Head of Communications, Marketing and Brand - Corporate before it is published, and must not:

- breach any copyright, discrimination, defamation, privacy, financial disclosure or other applicable laws;
- provide any opinion or advice (including financial advice) to any third party; or
- adversely impact Walker's brand or reputation.

Personal Use of Social Media

You should use common sense when accessing and using your personal social media accounts and must not publish any content on any social media account or platform which:

- is confidential or private information of Walker or any other employee, contractor, consultant or director or officer of Walker;
- disparages Walker or any employee, contractor, consultant or director or officer of Walker;
- could be considered bullying, or harassment (including sexual harassment); or
- adversely impacts Walker's brand or reputation.

You should remember that these obligations apply to your use of any social media account or platform even if you are not identifiable as a Walker employee, or your name is not identified.

For more information on use of social media and the internet, please see our [Email, Internet and Computer Usage Policy](#) and [Social Media Guidelines](#).

Human Rights

Respect for human rights is fundamental to how we work at Walker, and this commitment extends to everyone who works for us and with us. We expect you to conduct business in a safe, responsible and equitable manner, and in compliance with all applicable human rights laws, regulations and standards. For more information on Walker's stance on these issues, please refer to our [Modern Slavery Policy](#).

A copy of Walker's current Modern Slavery Statement can be found at [Modern Slavery Statements Register \(modernslaveryregister.gov.au\)](#)

Workplace Gender Equality and Inclusion

Workplace gender equality and inclusion within the Walker workplace is also fundamental to our everyday business operations, for the well-being and protection of our Walker Personnel and the communities in which we operate.

Walker's Workplace Gender Equality and Inclusion Policy sets the foundation to promote and support workplace gender equality and inclusion within the Walker workforce, for the betterment of society and consistent with Walker's obligations (as an employer of over 500 staff) under the *Workplace Gender Equality Act 2012* and associated regulations.

All Walker Personnel must ensure that they are familiar with the content of that policy and must comply with that policy.

Mental Health and Wellbeing

Walker acknowledges the importance of mental health and the role that workplaces have in affecting our staff's health and wellbeing. We highly value our employees - their health and wellbeing is a priority to us.

The Leadership Team are cognisant of Walker's obligations to provide a safe and compliant workplace and work practices, and assist staff to recognise mental health issues within themselves and others, and ensure they have the necessary information and support when needed.

Walker also acknowledges all employees 'right to disconnect' in Australia under the Fair Work Act 2009 – being an entitlement for employees to refuse to monitor, read or respond to contact or attempted contact from their employer (or work-related contacts) outside their working hours unless the employee's refusal is unreasonable. More information on this right can be found here; [Fair Work Commission](#). Should an employee require assistance to improve their health and wellbeing including in a time of personal or family crisis, then there are a variety of avenues of support available to that person including Walker Personnel:

- accessing Walker's Employee Assistance Program (EAP) 24/7/365 (which is delivered in partnership with MindFit by contacting 1800 862 042;
- implementing on or more of the initiatives in Walker's [Mental Health and Wellbeing Policy](#); and
- speaking to their Manager, the CFO or the COO for guidance and support.

Further information is available in Walker's [Mental Health and Wellbeing Policy](#),

Using Walker property and workplace surveillance:

Improper use or theft of Walker property

You are responsible for protecting property and assets assigned to you, and for keeping them safe. Do not remove any property and documents from Walker premises unless you have a good and proper reason. If you do need to remove an asset or documents and have approval to do so, then these should be stored securely and covered by appropriate insurances.

Your computer, along with your emails, are the property of Walker. Walker is legally responsible for all communications including emails. In addition to the monitoring of IT systems (including emails) for cyber threats and security purposes, Walker monitors Walker Personnel IT system and email usage, and may review all emails sent through the Walker IT system on an ongoing continuous basis. This monitoring is undertaken by Walker for the purpose protecting its assets, ensuring Walker Personnel safety, detecting fraud or theft, monitoring quality control and behaviour.

Acceptable Use of Technology

It is important that you have access to the equipment, systems and services you need to do your work properly. Please note however that all technology made available to you to enable you to do your work must be used legally, and any information you create or handle using our technology is Walker property. There is no implied right to privacy when using our technology.

For more information, please see our:

- [Data Transfer Policy](#);
- [Computer Security and Confidentiality Agreement](#);
- [Email, Internet and Computer Usage Policy](#); and
- [Corporate Mobile Phone Agreement](#).

Data Protection and Cyber-crime

Cyber-crime threats have the potential to cause considerable financial, commercial and reputational damage. While we continuously improve our technology defences, it is up to all of us to be aware of the potential threats and act as a first line of defence.

You should keep devices, usernames and passwords secure and not share this information with anyone, or install non-standard software on your device, or re-use your Walker password on any other third party services.

If you think there has been a security breach, or if you believe you have been the target of cyber fraud, tell the Chief Information Officer (CIO).

For more details, please see our [Cyber Incident and Reporting Guidelines](#).

Workplace surveillance

Workplace surveillance is carried out by Walker for the protection of the business, all Walker Personnel and invitees.

Walker's workplace surveillance includes the monitoring of network and computer devices (as referenced above) and optical surveillance (via visual security cameras) which are located in public areas within Walker premises. At no time will any optical surveillance be conducted in private or personal areas such as toilets or change rooms.

The monitoring and surveillance described above are both continuous and ongoing.

Breaches of this Code

If you are aware of an actual or suspected breach of this Code, you must escalate this to your manager, the CFO or the COO as soon as you become aware of it.

The report of an alleged breach of the Code that is subsequently found to be false or malicious may constitute a breach of this Code.

Any breach of this Code could lead to disciplinary action up to and including summary termination of your employment (or, if you are a contractor, the termination of your engagement). You should also be aware that if you breach any part of this Code, in some instances:

- a breach of this Code may also be a breach of the law and may have legal consequences for you; and
- Walker may be required by law to report your conduct to any relevant authority (eg, the police).

Review

This Policy is reviewed and updated every two years, or earlier if there are changes in legislative or regulatory requirements, or changes to the industries in which Walker operates, or changes to Walker's operations.