

# The Bloomfield Group

## Code of Business Conduct



THE  
*Bloomfield*  
GROUP

WE CARE. WE DELIVER.

[bloomcoll.com.au](http://bloomcoll.com.au)

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## *Delivering with Integrity* Code of Business Conduct

The Bloomfield Group is a proud and successful Australian mining and engineering group.

We seek excellence in all we do: respecting our history as we shape our future. Australian owned and operated, we have been part of the community for more than 80 years and employ hundreds of local people.

We pride ourselves on living our values through our commitment to safety, environment, community and our people. We conduct our business within the framework of applicable professional standards, laws, regulations and internal values and systems. However we acknowledge that this framework does not account for all types of behaviour.

Accordingly, we have created the Code of Business Conduct. The Bloomfield Group Code of Business Conduct applies standards for appropriate ethical and professional behaviour and is based on our Corporate Values: We Care, We Deliver. Our values form the basis of, and underpin all of the Bloomfield Group's business activities and relationships. The Code of Business Conduct provides a broad range of guidance about standards of integrity of business conduct. The code is a platform for everything we do however, it is not practicable for it to address every situation individuals may encounter. Therefore, the Code of Business Conduct is not a substitute for our responsibility and accountability to exercise good judgement and obtain guidance on proper business conduct.



The Bloomfield Code of Business Conduct supports workers to live our values. It does this by providing a guide to ethical practices and conduct that are clearly understood and consistently followed to comply with legal requirements and enable business excellence.





# Underpinning our business

OUR PURPOSE	OUR VISION	OUR VALUES
<p>We are a proud and successful Australian mining and engineering group</p>	<p>We seek excellence in all we do: respecting our history as we shape our future</p>	<p><b>WE CARE.</b> We respect &amp; care about:</p> <ul style="list-style-type: none"><li>▶ Our wellbeing &amp; safety</li><li>▶ Each other</li><li>▶ Our environment</li><li>▶ Our local community</li></ul> <p><b>WE DELIVER.</b> We work together with integrity to deliver:</p> <ul style="list-style-type: none"><li>▶ Improving safety outcomes</li><li>▶ Operational best practices</li><li>▶ Compliance</li><li>▶ Customer satisfaction</li></ul>





**We care. We deliver.**

## OUR VALUES

### SUPPORTIVE BEHAVIOURS

**We will...**

- ✓ Discuss issues openly and honestly and be receptive to ideas and feedback
- ✓ Help others by sharing knowledge, skills and experience
- ✓ Support relationships at work and in the community
- ✓ Look out for the wellbeing of our fellow workers
- ✓ Respect the environment in our day to day activities

### UNSUPPORTIVE BEHAVIOURS

**We will not...**

- ✗ Speak disrespectfully to, or about individuals, teams or company decisions
- ✗ Bully, harass or discriminate against
- ✗ Overlook an unsafe act or a hazard
- ✗ Ignore our responsibilities regarding legislation, management systems, procedures and expectations
- ✗ Disrespect the property of others and the Company

## WE CARE.

## WE DELIVER.

- ✓ Work safely, productively and reliably
- ✓ Set a positive example by the way we conduct ourselves
- ✓ Lead by example, always working safely and productively
- ✓ Always strive to do it right
- ✓ Communicate clearly, constructively and promptly
- ✓ Ask for clarification and help when needed

- ✗ Ignore unacceptable behaviors and standards
- ✗ Fail to do our share
- ✗ Plan our work without considering how it may affect others
- ✗ Put our own agenda ahead of the best outcome for the business
- ✗ Conduct ourselves in a negative manner



## Safety & health

**We strive for a ZERO HARM workplace, where every person goes home at the end of each workday physically and mentally safe. We are uncompromising in our commitment to the well-being of our people.**



## Environment & community

**We respect and care about our environment and our community.**



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We are committed to achieving the highest standard of safety and health in all activities in which we are engaged and to comply with all appropriate laws and regulations

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We aim to achieve an incident free workplace by performing all duties correctly from the outset

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We strive to provide a safe and healthy working environment for all employees, contractors and visitors and seek excellence and continuous improvement in all aspects of work processes and procedures

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We will actively identify, evaluate, control, monitor and review all hazards associated with our activities

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We will be personally responsible for our own safety and the safety of those around us

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We will use the necessary knowledge, skills and resources in order to operate safely

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We will accept accountability for following the Values, Policies, Management Systems, Plans and Standards

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Our aim is to achieve a high standard of care for the natural environment in all of the activities in which we engage

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We work to minimise our impact on the environment

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We will seek excellence and continuous improvement in environmental performance, production processes, waste management and use of resources

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We will act as a responsible corporate citizen and actively support the communities in which we live and work

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## Human rights & workplace

We will take a stand against harassment, bullying and discrimination in the workplace, and we will keep our word on the agreements we make.

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We will value diversity and inclusion and we are committed to a culture that respects all people.

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We will make a positive contribution to help create an environment free from any kind of discrimination, bullying, harassment or intimidation and stand up and support anyone impacted by behaviour that is contrary to this stance.

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We will use the principles of equal employment opportunity and decisions on hiring, salary, benefits, advancements, termination or retirement will be based solely on the employees' ability to do the job.

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## Business integrity

We approach our business relationships with integrity, ensuring that our actions reflect our intentions.

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We will comply with law and regulations

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We will not represent the Company's views to governments and other external stakeholders on matters affecting the business' interests unless authorised

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We will not directly or indirectly offer, pay, solicit or accept bribes or secret commissions / benefits in the course of conducting our business

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We will be open and honest and declare any work, business or action being offered on behalf of the Company to a business in which family or friends might benefit.

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## Professional behaviour & fair dealing

We will act honestly and fairly in all business transactions and dealings with others.

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We commit to fair and honest dealings and treating others with respect, dignity and courtesy

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We will perform our duties in a professional manner and act fairly, honestly and objectively, striving at all times to enhance the Bloomfield reputation and performance

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We will take all reasonable and necessary precautions to prevent the disclosure of any Confidential Information

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## Conflict of interest

We understand our prime employment is with the Bloomfield Group and that we will faithfully and diligently perform.

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We will disclose any direct, indirect, actual, potential or perceived conflict of interest which occurs internally or externally

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We will make clear that when participating in an outside activity any opinion is expressed clearly as a personal view and cannot be interpreted as the view of the Company

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We understand we must have approval to take part in an external activity, additional employment or any outside business activity that will involve activity during working time, will impinge on our ability to perform our work, or is a conflict of interest

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## Gifts, entertainment & gratuities

We will not accept or give anything that puts our professional integrity and that of the Company in question.

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We will not give or accept gifts that could reasonably be regarded as compromising our judgement, giving rise to a conflict of interest, damaging to relationships of others, indicating favouritism or bias, or conflicting with our core value of **integrity**

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We must never ask for gifts in the course of conducting our business

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We will declare to a SMT member all gifts accepted

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We will refer to a member of the Board offers of travel, accommodation, entertainment and/or any personal benefit / advantages for approval

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## Respect of company property

We understand that Company property and assets are for beneficial use to the business.



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We will be responsible for protecting the Bloomfield Group's property and assets and will safeguard them from loss, theft and unauthorised use

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We will not obtain, use or divert property for personal use or benefit without proper authorisation

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We will not materially alter or destroy property without proper authorisation

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We will not intentionally cause the integrity of our documents to be compromised or destroyed in any way

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## Information technology use

We recognise that Internet and email are powerful tools of communication, and if misused can be detrimental to the business and productivity.

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We will use email, internet systems and business phones primarily for use in our employment

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We acknowledge that the Company reserves the right to monitor the usage of these systems

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We will not use the systems provided for unethical or unacceptable purposes

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We will be respectful to our peers and not view or send explicit or offensive material

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# Framework for making ethical decisions

This framework supplements the Code of Business Conduct and will assist us in resolving any issues. The below steps can be followed as a guide in deciding on a course of action:

## STEP 1: Recognise the Event, Decision or Issue

- ▶ Are you being asked to do something that you think might be wrong?
- ▶ Are you trying to make a decision and are you unsure about the ethical course of action?
- ▶ Are you aware of potentially illegal or unethical conduct on the part of others at the Bloomfield Group?

**Asking yourself the following questions may help you to clarify ethical dilemmas:**

- ▶ Is it against the Code of Business Conduct or our Company Values?
- ▶ Does it feel right?
- ▶ Is it legal?
- ▶ Will it reflect negatively on me or the Bloomfield Group?
- ▶ Who else could be affected by this?
- ▶ Would I be embarrassed if others knew I took this course of action?
- ▶ How would it look if my friends/colleagues/family read about this in the newspaper or saw it on social media?
- ▶ What would a reasonable person think?
- ▶ Will it keep me awake at night?

## STEP 2: Think Before you Act

- ▶ Once you have clarified the issue, summarise it
- ▶ Determine your responsibility
- ▶ Consider the options and consequences
- ▶ Review all relevant facts and information
- ▶ Refer to applicable Bloomfield Group Management Systems, policies or professional standards

## STEP 3: Decide on a Course of Action

- ▶ If it becomes apparent that the issue is inconsistent with the Code of Business Conduct or the Business Values, stop all activities relating to the issue and refer it to your Supervisor or Manager
- ▶ If your review does not surface any actual or likely situations that could compromise the Business Code or Business Values, proceed as your natural course of business
- ▶ Assess any risks of the decision to proceed and how you could reduce them

## STEP 4: Test your Decision

- ▶ Review the questions in Step 1 and apply your course of action
- ▶ Apply the Values and Supporting Behaviours to your decision
- ▶ Make sure you considered the Management Systems, policies, the law and professional standards
- ▶ Consult others for a final check

## STEP 5: Proceed with Confidence

- ▶ Communicate decision and rationale to stakeholders
- ▶ Reflect upon what was learned



**We seek excellence in all we do:**  
respecting our history as we shape our future



**WE CARE. WE DELIVER.**