

HAMILTON ISLAND

GREAT BARRIER REEF AUSTRALIA

Supplier and Contractor Code of Conduct

Hamilton Island Enterprises Limited (**HIE**) operates Hamilton Island, Dent Island and Shute Harbour Logistics Terminal and Barge MV Samson (**Hamilton Island or Islands**). HIE is dedicated to maintaining ethical operations that safeguard our workers, guests, visitors, community, and the environment. We strive for procurement practices and relationships with our suppliers and contractors that are fair, transparent, and uphold the highest standards of integrity.

1. Purpose and Scope

This Code of Conduct applies to all suppliers engaged in supplying goods and/or services to HIE (including contractors, concessionaires and registered businesses), whether on Hamilton Island or mainland Australia (**Supplier/s**) and includes all their employees, representatives, subcontractors, agents and invitees (**Personnel**). Reference to Suppliers herein shall include Supplier's Personnel.

This Code of Conduct sets out the principles of business ethics and standards of behaviour that are expected from Suppliers and their Personnel. This Code of Conduct is a key part of your contract with HIE. It should be read in conjunction with the contract. Suppliers are expected to proactively assess and ensure compliance with this Code of Conduct.

HIE reserves the right to amend this Supplier Code of Conduct as and when it deems appropriate.

2. HIE Policies and Procedures

This Code of Conduct should be read in conjunction with HIE's policies and procedures available at <https://www.hamiltonisland.com.au/community-and-development/policies-forms> which also apply to all Suppliers and their Personnel, including but not limited to:

- Hamilton Island and Dent Island Rules and Regulations relevant to all persons located on the Islands;
- Privacy Policy setting out the measures used by HIE to protect data and privacy;
- Vehicle Ownership Guidelines applicable to vehicles owned or operated on the Islands; and
- Hamilton Island Building and Construction Works Policy, outlining requirements for any building and construction activities on the Island.

3. Feedback

If you have a concern about conduct or a situation that does not meet the standards set in this Code of Conduct or any other HIE policy, you should report it. By speaking up, you provide HIE with the information necessary to investigate, address and resolve such situations. HIE is committed to protecting whistleblowers and ensuring that individuals who raise concerns in good faith are not subject to retaliation.

- General feedback: corporate@hamiltonisland.com.au
- Privacy feedback: privacy@hamiltonisland.com.au
- Concessionaires and registered business feedback: Concessionaires@hamiltonisland.com.au
- Anonymous feedback: <https://hamiltonisland.whispli.com/>

Our Safe to Speak Policy is available at:

<https://www.hamiltonisland.com.au/HamiltonIsland/media/PDF-Files/Energy/Safe-to-Speak-Policy.pdf>

4. Breach of this Code of Conduct

Breaches of this Code of Conduct are taken seriously and will be investigated to determine appropriate consequences, in line with your contract with HIE and the Rules and Regulations.

HIE reserves the right to conduct compliance audits to ensure adherence to this Code of Conduct. Suppliers are expected to fully cooperate and provide any necessary documentation and access.

Where a Supplier is found to have breached this Code of Conduct, HIE may review the terms of the agreement with the Supplier and take appropriate action. Alleged serious misconduct by Supplier Personnel will be investigated and, if substantiated, may result in disciplinary action up to the person being asked to leave the Islands. Suspected illegal activities may be reported to the relevant authorities such as the Queensland or Federal Police.

EXPECTATIONS FOR SUPPLIERS AND CONTRACTORS

5. Compliance

Suppliers and their Personnel must comply with all relevant laws and standards applicable to their operations and the goods or services they provide to HIE. Suppliers must also comply with laws, permits and requirements of Government Authorities relevant to the Islands. Suppliers are expected to stay informed about relevant legal requirements and ensure ongoing compliance in all business activities. Suppliers agree to cooperate fully with HIE to ensure ongoing compliance with applicable laws and standards, including providing all necessary information or documentation and taking prompt action to address any actual or potential compliance issues or to respond to any requests or inquiries from regulatory authorities.

6. Commitment to Safety

Suppliers and their Personnel must comply with all applicable Work Health and Safety (WHS) legislation, including applicable regulations and Codes of Practice. Suppliers are expected to:

- Provide a safe work environment and apply industry best practices in operations.
- Conduct regular safety training for Personnel, supply necessary safety equipment, and promote a culture of safety and accountability.
- Proactively identify and address potential safety hazards to prevent accidents and injuries.

- Promptly notify HIE of any actual or potential safety risk or incident and comply with any reporting requirements under law.

7. Commitment to the Environment

Suppliers must comply with all applicable environmental laws and minimise the environmental impact of operations by adopting responsible policies and practices. This includes:

- Preventing environmental damage resulting from activities, including damage to wildlife or the marine environment.
- Maintaining a proactive approach to environmental management, including regular monitoring and improvement of environmental practices.
- Promptly notify HIE of any actual or potential environmental issue (such as a spill or release of hazardous materials) and cooperatively work with HIE to ensure compliance with law.
- Providing data on greenhouse gas (GHG) emissions and other sustainability practices to help HIE meet its reporting obligations under applicable laws, regulations, and industry standards.

8. Employment Practices

Suppliers must comply with all applicable laws relating to employment, payment and work conditions, including but not limited to the *Fair Work Act 2009* (Cth) and the National Employment Standards. This includes:

- Implementing policies and procedures to promote fair and ethical employment practices, including equal employment opportunities and comprehensive training programs.
- Maintaining an inclusive and respectful work environment, ensuring zero tolerance for discrimination, harassment (including sexual harassment), physical violence, or bullying in any form—whether verbal, physical, or written (including email, social media, or other communication channels).
- Promptly notifying HIE of any actual or potential issue or concern relating to these laws and standards.

9. Human Rights and Modern Slavery

HIE is committed to protecting human rights and supporting the objectives of the Modern Slavery Act 2018.

- (Cth) to eliminate modern slavery. Suppliers are expected to:
- Comply with the Modern Slavery Act and all relevant laws.
- Make reasonable efforts to ensure that businesses within their supply chain are not involved in human rights abuses, including forced or child labour.
- Support HIE in assurance activities, audits, or documentation requests to verify compliance with the Modern Slavery Act and improve supply chain transparency.
- Promptly notify HIE of an actual or potential issue or concern relating to human rights or modern slavery in its operations or supply chain.

10. ETHICAL BUSINESS PRACTICES

HIE is committed to maintaining the highest standards of conduct and ethical behaviour in all business activities.

Suppliers and their Personnel are expected to uphold the highest standards of integrity and ethical conduct in all dealings with HIE. This includes:

- **Prohibition of Corruption and Bribery** – Suppliers and their Personnel must not engage in any form of bribery, corruption, or fraud. Offering inducements or rewards to HIE or its personnel to influence business decisions is strictly prohibited.
- **Managing Conflicts of Interest** – Suppliers must ensure that no conflict of interest exists at the commencement of their engagement with HIE or during the term of the engagement. If a potential, perceived or actual conflict of interest arises during the term, the Supplier must notify HIE immediately in writing and may be required to resolve the conflict to HIE's satisfaction.
- **Fair Competition** – Suppliers must engage in fair and open competition, complying with all relevant laws. Anti-competitive behaviour is strictly prohibited.
- **Transparency and Accountability** – Suppliers must maintain accurate and transparent records of all transactions with HIE. Records must be readily available for audit or review upon request.

11. Protection of Information, Privacy and Confidentiality

HIE is committed to respecting privacy and protecting personal information from misuse or unauthorised disclosure, in line with applicable privacy laws. Suppliers are expected to:

- Comply with all laws relating to privacy, data protection, and cybersecurity.
- Respect and protect confidential information and take appropriate measures to prevent unauthorised or inappropriate disclosure or use.
- Take effective cybersecurity measures to safeguard personal and sensitive data and prevent data breaches.
- Promptly notify HIE if a known or suspected cybersecurity incident may impact HIE.
- Respect the privacy of all guests on Hamilton Island, especially any high profile and well-known identities.

12. Media and Social Media

Suppliers and Personnel must act with discretion when using social media or other communication platforms. This includes:

- Not posting any material that is obscene, defamatory, threatening, harassing, discriminatory, or likely to bring the Islands or HIE into disrepute.
- No communication must be made by a Supplier on behalf of HIE. This includes to any media organisation or representative, providing film footage or photography or taking part in any unauthorised interview regarding Hamilton Island or HIE.

13. Conduct while on the Islands

Due to the unique nature of Hamilton Island's location, Suppliers and their Personnel may need to stay overnight, live or spend time on Hamilton Island including outside of working hours. This creates additional expectations regarding conduct both during and outside of work hours.

This Code of Conduct should be read alongside the Hamilton Island Rules and Regulations, which apply to all Suppliers and their Personnel and must be followed at all times. Suppliers and Personnel are expected to maintain a high standard of professionalism at all times. The obligations under this Code of Conduct and the Rules and Regulations apply during and after working hours, including in

any hospitality venues. Failure to comply may result in disciplinary action, including removal from the Islands.

At all times, Suppliers and their Personnel are expected to:

- Comply with laws, this Code of Conduct and the Rules and Regulations and the reasonable directions of HIE representatives including of the Island Security Officers.
- Act appropriately and with professionalism.
- Be respectful and polite to all guests and visitors. For example, allow guests to be served first, including when boarding or disembarking transport.
- Adhere to applicable uniform and presentation standards, wear clean suitable clothing and footwear at all times and not wear hi vis apparel in guest areas unless working.
- Avoid creating a nuisance (such as noise, smell or dust) when performing operations.
- Use designated service roads and pathways and back-of-house/staff entries where possible.
- When in uniform or on duty:
 - Not swear or talk about personal affairs in front of guests.
 - Not use mobile phones unless required for your role (headphones and earbuds are not permitted).
 - Consume food in designated staff areas, where possible.
 - Have a specific purpose for visiting retail outlets on Front Street and not loiter unnecessarily.
 - Notify the outlet Manager if required to conduct a business meeting in a food and beverage outlet while in uniform.
- Respect property of HIE (including vehicles) and not cause damage. Theft and misappropriation of property is a serious offence.

14. Alcohol, Drugs and Smoking/Vaping

The possession, use, sale or distribution of illegal drugs or drug paraphernalia is strictly prohibited under laws and will not be tolerated on Hamilton Island at any time. To maintain a safe work environment, all workers (including Suppliers and their Personnel) must not be under the influence of alcohol, drugs, or any other substances that impair judgment or performance while at work. Alcohol and drug testing may be conducted by Queensland Police and Island Security. It is a serious offence to record an unsafe or illegal blood alcohol level, and/or being under the influence of alcohol or drugs, when working or otherwise in contravention of laws, or otherwise being under the influence such that your duties are impaired.

There are a number of restrictions in place regarding the consumption of alcohol, smoking of cigarettes, including vaping, and Suppliers are expected to comply. Please refer to the [Rules and Regulations](#) and signage.

15. Socialising with Guests

There is a standard of professionalism required by Suppliers towards guests of Hamilton Island. Suppliers are not permitted to invite guests to their accommodation or go to the guests' accommodation without approval from your HIE contract representative.

16. Vehicle Use

Suppliers may be authorised by HIE to drive vehicles (including golf buggies or cars/trucks). Driving on Hamilton Island requires compliance with all vehicle and road laws and signage, and the Queensland Road Rules. The [Vehicle Ownership Guidelines](#) and the Rules and Regulations set out the

responsibilities of those operating a vehicle at any time and must be complied with by Suppliers and their Personnel.

17. CCTV

CCTV and other forms of recording may occur across the Islands for safety and security purposes and footage may be used in accordance with the CCTV and Use of Footage Policy (available from the Island Security Office). Signage is installed so that guests, Suppliers and their Personnel and HIE employees are aware.

18. Access to the Resort Zone

The Resort Zone, Resort Facilities and qualia (refer to maps in Appendix A, B, C and D of the Rules and Regulations) are for the use of guests only. Suppliers and their Personnel may access the Resort Zone, Resort Facilities and qualia for business purposes only. Any access and use outside of work hours must comply with the following requirements.

19. Pass Requirements

An “on premise pass” may be obtained the Island Security Office if you have an acceptable reason for seeking access to the following Resort Zone and Resort Facilities:

- **Restaurants and Bars:** A pass is required for the following outlets within the Resort Zone: Reef Lounge, Island Bar and Beach Club (other than the restaurant).
- **Pools:** A pass is required for the Resort Zone pools being: Main, Sails, Reef View Hotel, Beach Club, The Sundays and Bougainvillea.
- **Access after 10pm:** Personnel are not to be within the Resort Zone after 10pm unless returning from an approved venue for which they have a Pass, or a venue under the exceptions list below.

20. Exceptions

- **Restaurants:** A pass is not required to eat at the following restaurants: Sails, Coca Chu, Pool Terrace, Beach Club, Catseye Pool Club Restaurant, Long Pavilion and Pebble Beach.
- **Activities:** A pass is not required for the Sports Club, Island Arcade and bowling and the retail outlets at Resort Zone or qualia. Please note that access to activities and venues is subject to change and will be subject to guest demand.
- **Spa:** A pass is not required if you are receiving a treatment at Spa qualia or spa Wumurdaylin.
- **Property owners/residents:** if the Personnel own or reside in a property within the Resort Zone, you may use the facilities associated with that property or within the Resort Zone without a pass.
- **Staying at a Hotel:** If the Personnel are staying at a hotel within the Resort Zone for work or leisure, they may use the facilities at that hotel.

21. Residents

- If a Supplier or their Personnel own property on Hamilton Island, access is permitted to the Resort Zone and Resort Facilities without need for a pass.
- If Supplier Personnel permanently reside (i.e. permanently rent a house or apartment within a complex), you may use the facilities at that house or complex.

22. Beach

Suppliers may use the south-east end of Catseye Beach during daylight hours. Access is by the laneway adjacent to the Beach Pavilion. You are not permitted to use the pool and beach chairs or lounges.

23. Pools

Pools in the Resort Zone are reserved for guests only, unless you have a pass or an exception below applies:

- Families who reside in Harbour View or East View staff accommodation are permitted to use the Bougainvillea Pool.
- The Reef View Hotel swimming pool may be accessible to Suppliers who are training for a sporting event or competition. They must receive approval and register with the Sports Club Manager before using the pool and conditions of use apply.

Unauthorised use of pools in the complexes of private residences on Hamilton Island is strictly prohibited.