



## **CODE OF CONDUCT**

**Ground One Civil Pty Ltd**

### **1. Our Purpose**

Ground One Civil is an Indigenous-owned civil construction company committed to delivering sustainable financial performance alongside measurable social and environmental impact.

Our Constitution embeds our commitment to empowering Indigenous Australians through meaningful employment and training, supporting community development, protecting the environment, and operating with integrity and accountability.

This Code of Conduct outlines the standards of behaviour and ethical practice expected of all directors, employees, subcontractors, consultants, and representatives of Ground One Civil. Compliance with this Code is a condition of engagement with the company.

### **2. Our Core Commitments**

**Integrity** – We act honestly, transparently, and ethically in all business dealings.

**Indigenous Empowerment** – We create employment pathways, apprenticeships, leadership development and culturally safe workplaces for Indigenous Australians.

**Respect and Inclusion** – We foster inclusive, respectful environments where diversity is valued and discrimination is not tolerated.

**Safety and Wellbeing** – We prioritise the physical and psychological safety of our people and partners.

**Environmental Responsibility** – We pursue low-impact, resource-efficient construction practices and comply with environmental legislation and industry best practice.

**Sustainable Growth** – Financial performance supports, but does not override, our social and environmental purpose.

### **3. Workplace Conduct and Behaviour**

Ground One Civil maintains a zero-tolerance approach to bullying, harassment (including sexual harassment), discrimination, racism, victimisation, and unsafe behaviour.

All personnel must treat others with dignity and respect, promote cultural awareness and sensitivity, contribute to a safe and inclusive workplace, behave professionally on client sites and in the community, and comply with all company policies and legal obligations.

We are committed to maintaining culturally safe environments for Indigenous employees and stakeholders.

### **4. Health, Safety and Environment (HSE)**

Safety is non-negotiable.

We commit to full compliance with WHS legislation and regulations, maintaining safe systems of work, continuous improvement in safety performance, environmental protection and compliance, and empowering all workers with stop-work authority where unsafe conditions exist.

Every worker has the right and responsibility to contribute to a safe workplace.

### **5. Ethical Business Practices**

Ground One Civil conducts business fairly and responsibly.

We prohibit bribery and corruption, facilitation payments, undisclosed conflicts of interest, fraudulent reporting, and misuse of company assets.

All personnel must declare actual or perceived conflicts of interest, maintain accurate and transparent records, protect confidential information, comply with procurement and contract integrity requirements, and engage suppliers and subcontractors who align with our ethical and sustainability standards.

### **6. Community and Cultural Responsibility**

As an Indigenous-owned organisation, we recognise our broader responsibilities to community.

We commit to respecting Indigenous land, culture, and knowledge, supporting Indigenous employment and training pathways, responding promptly and respectfully to community concerns, contributing positively to the communities in which we operate, and upholding Supply Nation certification standards and Indigenous ownership integrity.

### **7. Financial Integrity and Reinvestment**

We are committed to responsible financial management and transparent reporting.

Financial returns support our social and environmental objectives. Surplus funds are reinvested to

advance Indigenous employment, training, and community impact. Financial viability is pursued in a manner consistent with our purpose and governance obligations.

## 8. Governance and Accountability

Our Directors are required to act in the best interests of the company by balancing our social purpose, the wellbeing of Indigenous employees and communities, environmental sustainability, and financial responsibility.

All business decisions must align with our constitutional objects.

## 9. Reporting and Whistleblower Protection

Ground One Civil encourages the reporting of unsafe practices, ethical concerns, suspected misconduct, and breaches of this Code.

Reports may be made to a Director or nominated officer. We strictly prohibit retaliation against any individual who raises a concern in good faith.

All reports will be treated seriously and investigated appropriately.

## 10. Breaches of the Code

Failure to comply with this Code may result in disciplinary action, termination of employment or contract, and referral to regulatory authorities where required.

## 11. Review and Approval

This Code of Conduct is reviewed annually to ensure it remains current, relevant and aligned with Ground One Civil's constitutional commitments and strategic objectives.

Approved by the Board of Directors.

Signed:

Jody Gropler  
Director  
Ground One Civil Pty Ltd

Date: 12.01.2026

