

TOLL GROUP

Code of Practice

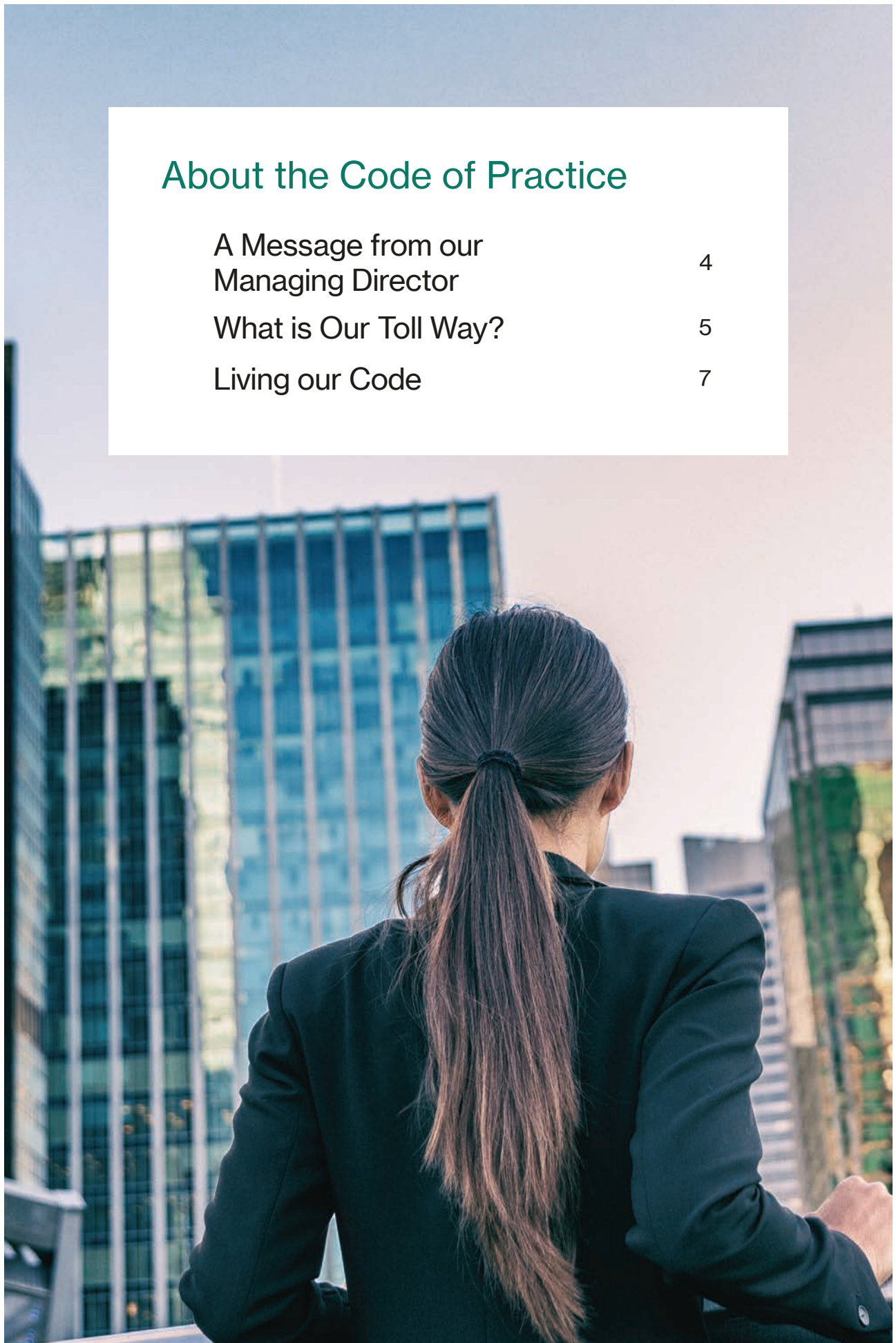
Helping you live
Our Toll Way

Contents

About the Code of Practice	3
A Message from our Managing Director	4
What is Our Toll Way?	5
Living our Code	7
How we do Business	10
Anti-Bribery and Anti-Corruption	11
Competition	15
Environment	18
Conflicts of Interest	21
Health and Safety	26
Corporate Security and Crisis Management	29
Intellectual Property	32
Sanctions and Export Controls	35
Information Systems	38
Our People	41
Workplace Behaviours	42
Equal Opportunities and Managing Diversity	45
Travel and Expenses	48
Drugs and Alcohol	52
Privacy	55
Ethical Labour Practices	58
External Relationships	62
Gifts, Entertainment and Hospitality	63
Political Donations	67
Sponsorships, Donations and Social Investments	70
Communications	73
Communicating Outside of Toll	74
Social Media	77
Questions / Contacts	80

About the Code of Practice

A Message from our Managing Director	4
What is Our Toll Way?	5
Living our Code	7





A Message from our Managing Director, Alan Beacham

At Toll, we have a vital purpose – we move the businesses that move the world. We should all take pride in working for a company that plays a vital role in delivering essential goods and services to communities around the world.

As a leading global logistics company, we understand that communities hold us to the highest ethical standards. Our strong values guide us in all our endeavors. Every aspect of our business is aligned with these values, ensuring that our actions consistently reflect our unwavering commitment to them.

Toll's Code of Practice clearly outlines our company standards and the way we chose to do business, whatever we do and wherever we are.

Our decisions, behaviours and actions define our brand and reputation, and every one of us is expected to behave in accordance with our Code. If you see something that you believe is not right, you should not hesitate to raise your concerns, and know that it's safe to do so. Please read this Code carefully. By following this Code, we will deliver the best outcomes for our customers, communities and each other.

A handwritten signature in black ink that reads "Alan".

Alan Beacham
Managing Director, Toll Group



By following this Code, we will deliver the best outcomes for our customers, communities, and each other.



What is Our Toll Way?

Our Toll Way represents the way we do things at Toll, what is important to us and how we will achieve our goals.

Together our values and core beliefs, along with our codes, policies, and procedures, define what is expected of us and what we can expect from others at Toll.

The elements of Our Toll Way give us a common understanding of why we exist, where we are heading and how we are going to go about achieving our goals.

Our Toll Way comes to life through the actions of everyone, every day in our workplaces. It provides a guide for our decisions and actions as together we build the spirit and strength of Toll.

As employees of Toll, you are required to regularly revisit and uphold the Code.

Understanding Our Toll Way



Building on our Australian heritage, the lotus flower reflects our Asian parentage and is a symbol of rebirth, resilience and strength.

Our Toll Way brings together our Values, purpose, strategic priorities and culture compass. It's the common thread that connects over 16,000 team members across 500 sites in 27 countries. It helps guide our decisions and actions to make sure that we all work together to deliver the best possible solutions for our customers. We know that good businesses are built on a clear purpose and strong values that are deeply embedded and guide the right behaviours.

TOLL

Our Purpose is our north star



We move the businesses that move the world.

It's an important purpose that describes the vital role in our global communities, from delivering fuel and medicine, to a birthday package, and everything in between. While we help businesses make big moves everyday, we never forget how much the little things matter and our crucial role in their success.

Our Values guide how we deliver on our purpose



Our Values were shaped with input from our people, capturing what we wanted to preserve and what we wanted to change at Toll.

And they are relevant for every Toll team member, regardless of division, role or location. We wanted to continue to create an accountability and performance-driven culture; teamwork and a strong customer focus will drive this.



CUSTOMER



TEAMWORK



PROGRESS



ACCOUNTABILITY



INTEGRITY

Our strategy for growth



As our business starts its journey toward simplification, our frameworks have been simplified into one graphic.



CARE

Care for our people and community



COMPETE

Smarter working so we're fit for growth



GROW

Growth with customers through outstanding customer solutions



Living our Code of Practice

Why do we have a Code of Practice?

The Code of Practice (**Code**) helps us understand how we should respond to certain situations while working at Toll. The Code is your ethical guide; it will help you make the right decision every time, protecting you as an employee and Toll as a company.

As a global company, we comply with applicable laws and regulations of the countries in which we operate. Where differences exist between our Code and local norms, rules, or regulations, we apply the highest standard.

We have developed the Code in consultation with the business' subject matter experts. These people understand the laws and policies that apply to their area of expertise and have interpreted them to help us preserve our excellent reputation.

Operating with integrity is everyone's responsibility. Each section of the Code explains our principles, our expectations of our employees and others who work with us.

To ensure you give yourself the best chance to succeed, please familiarise yourself with the Code.

What if I have any questions?

If you are unsure about an item in the Code, speak to your line manager, HR manager or relevant subject matter expert. At the back of this document, you will find a list of contacts. You can contact these people if you are unsure about any part of this policy.

You can access our full set of [policies and guidelines](#) on the intranet. These may help you further understand your obligations under the Code.



Report it

Don't investigate it

Whistleblowers will be treated with respect and protected from any form of retaliation

Keep information confidential



What should I do if I witness a breach of the Code?

Speaking up protects everyone. When concerns are raised, it helps us identify and address potential issues and improve how we work. As an employee, you should not only live by the Code but ensure your colleagues, suppliers and customers also adhere to our principles.

We know that speaking up takes both integrity and courage and we respect this by treating your concern with sensitivity and committing to investigate where appropriate. There are several ways you can report your concern and we encourage you to choose the option that you feel the most comfortable with. These include:

- [The Toll Disclosure Hotline](#)
- Toll Global Head of Compliance
- Eligible recipients or Prescribed Recipients as defined in our [Toll Group Whistleblower Policy](#)
- Members of Toll's Global Leadership Team in person or via their Toll email address (which will be in the format <firstname>.<lastname>@tollgroup.com); or
- An auditor or member of an audit team conducting an audit of Toll.

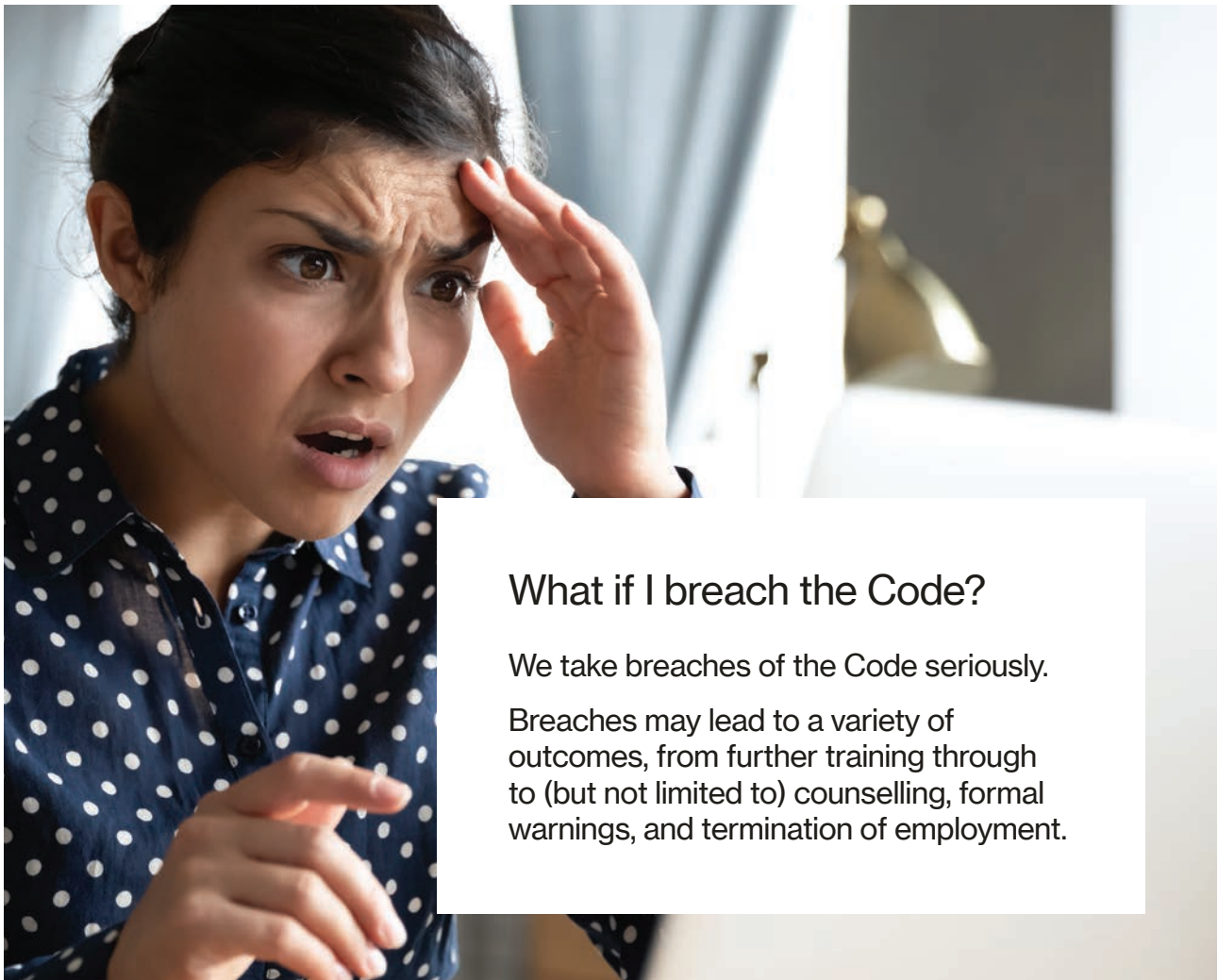
The Toll Disclosure Hotline is an independent, secure telephone and internet-based reporting system available 24/7 in multiple languages you can use to submit reports about suspected wrongdoing. You do not need to give your name or any identifying details if you do not want to, although doing so will make it easier for Toll to investigate the disclosure.

The Disclosure Hotline is specifically relevant to any unlawful activity that you suspect at Toll and is available in all locations.

The **Toll Group Whistleblower Policy** sets out Toll's commitment to ensuring that those who make disclosures to the Toll Disclosure Hotline will not be subjected to any detrimental action as a result of the disclosure. We don't allow any form of punishment, discipline or retaliatory action to be taken against anyone for speaking up or cooperating with an investigation. If you feel that you have been retaliated against for speaking up, you should report it immediately using the Toll Disclosure Hotline, or through one of the other channels listed above.

Regardless of how you report your concern, the information you provide will be dealt with confidentially. If you wish to remain anonymous, all reasonable steps will be taken to reduce the risk that you will be identified as a result of responding to your concern. This means the information you provide will only be shared where this is necessary to investigate it and measures to protect your identity will be put in place as far as possible.

Nothing in our Code, our policies or any other document or procedure at Toll prevents you from reporting what you reasonably believe is a breach of the law to an appropriate government authority or from seeking legal advice in relation to your rights about disclosing information.



What if I breach the Code?

We take breaches of the Code seriously.

Breaches may lead to a variety of outcomes, from further training through to (but not limited to) counselling, formal warnings, and termination of employment.

How we do business

Whether managing our assets – including our people, our brands, know-how, equipment and property – or meeting our social and environmental responsibilities, at Toll, **how** we go about achieving success is as important as success itself.

The subjects covered in this section of our Code, underpinned by the guiding values and Our Toll Way, describe **how we do business** at Toll.

Anti-Bribery and Anti-Corruption	11
Competition	15
Environment	18
Conflicts of Interest	21
Health and Safety	26
Corporate Security and Crisis Management	29
Intellectual Property	32
Sanctions and Export Controls	35
Information Systems	38



Anti-Bribery and Anti-Corruption

Toll does not take part in corrupt business practices of any kind. This includes business dealings that are illegal, immoral, or incompatible with our ethical standards.

Bribery involves the offering, promising, giving, accepting, or soliciting anything of value, whether directly or indirectly, to or from anyone to influence the recipients in their role or to encourage them to perform their work disloyally, improperly or illegally.

Toll does not tolerate bribery, or corruption or any criminal or unethical behaviour by employees, or anyone acting on behalf of Toll. Bribery, facilitation payments, kickbacks, pay-offs, secret commissions and any undue payments or payment in kind are prohibited, whether made directly or indirectly, and even where such payments are not an offence under local law or are part of local custom and practice.

This applies to small bribes to speed up routine government transactions (also known as facilitation payments), as well as bribes to secure or retain business. We condemn bribery and corruption regardless of whether it is practised widely in a country or region in which Toll operates, and regardless of whether it is provided directly or via a third party. Compliance with anti-bribery and anti-corruption laws is essential. All our employees, contractors, directors and third parties we deal with, including our agents, vendors, subcontractors, and suppliers, are required to comply with any applicable anti-bribery and anti-corruption laws. No one has the authority to waive this requirement.

Always

- ✔ Report it if you are ever included in discussions about bribes or suspect someone at Toll or one of our business partners is involved in planning or making bribes
- ✔ Report it immediately if a bribe is ever demanded of you or someone you know at Toll or one of our business partners
- ✔ Refuse a bribe if it is offered to you by a business partner and immediately report it
- ✔ Record all transactions accurately and in reasonable detail reflecting their true nature. Ensure you keep accurate records of any business transactions as they occur and retain them for as long as legally required.
- ✔ Keep in mind and ensure that when you offer or provide anything of value to an external person, that item must:
 - Only be offered or provided for a legitimate business purpose
 - Not be offered or provided to improperly influence or reward action
 - Be legal under local laws
 - Be of appropriate value and nature considering local customs and the law, the position of the recipient and the circumstances
 - Not be capable of causing reputational harm to Toll
 - Comply with any pre-approval and declaration requirements set out in our policies.

Never

- ✘ Offer, promise, give or approve anything of value of any kind to a government official, political party or candidate for public office to influence official action
- ✘ Engage in any conversation about, be part of, or provide an improper benefit or bribe to anyone either directly or via a third party
- ✘ Respond positively to a demand for a bribe from anyone in your dealings at Toll, unless you feel your safety is under threat
- ✘ Create a false, inaccurate, or misleading financial record of any business transaction
- ✘ Use an agent, subcontractor, or other supplier if you are concerned, they will engage in corrupt or improper conduct on Toll's behalf.



Integrity



Supporting you

Toll recognises that in some cases, demands for bribes may be accompanied by a threat of physical harm. We put the health and safety of our people first. If you are ever exposed to such demands – or think or know someone else may be – do what you need to do to stay safe. As soon as possible you must report it to your line manager, Group Compliance, the Chief Human Resources Officer and the Chief Legal Officer.

Threats may also include the loss of business. You must not make any improper payments in response to these threats. You will not be criticised or penalised for any loss of business resulting from refusing to engage in or alerting management to bribery requests or corrupt activity.

Our Toll Way

We believe people perform best when they are empowered, accountable and recognised. The value we place on being **Open and Transparent** in all our business dealings, and our firm stance against any form of bribery or corruption, are other ways we bring to life our values of **Integrity and Trust**.

What if...

Your Toll business unit is negotiating a contract with a large international company and the customer has suggested that you should include a discount for repeat business.

What would you do?

It is acceptable to offer discounts and rebates in line with Toll's commercial strategy as long as they are properly recorded in our agreements with customers and in our internal accounts, and those amounts are paid to the customer, and do not directly or indirectly benefit any individual employee personally from both sides. They are not the same as a bribe or kickback because the arrangement is transparent and the benefits will go to our customer's company, not to any individual involved in commissioning the work.

More Information

Policies: [Toll Group Anti-Bribery and Anti-Corruption Policy](#), [Toll Group Gifts, Entertainment and Hospitality Policy](#), [Toll Group Sponsorships, Political Donations and Social Investments Policy](#), [Toll Group Conflicts of Interest Policy](#), [Toll Group Anti-Money Laundering Policy](#)

Advice: Your line manager, your Business Unit or Divisional Lead Counsel, Chief Legal Officer or Group Compliance



Competition

Toll never engages in illegal conduct that reduces competition in the markets that we operate in.

We believe our customers' success creates our success. Just like our business, our customers' businesses can only truly succeed if they can purchase goods or services from their suppliers on fair terms. This is how a fair and competitive marketplace works.

Always

- ✔ Be aware of any anti-competitive behaviour or discussion, including those among or with customers or resellers, as this is improper conduct and illegal, and could make you personally liable
- ✔ Report any suspected or possible anti-competitive activity without delay
- ✔ Be careful when attending trade association forums that the discussion doesn't turn to any subject that could be construed as anti-competitive, i.e., pricing, tenders, market or customer sharing or commercially sensitive information which should remain confidential.
- ✔ Remove yourself from a conversation or activity you think might be anti-competitive and report it as soon as possible
- ✔ Discuss exclusive service arrangements with your Business Unit or Divisional Legal Counsel to ensure the arrangement is not anti-competitive.

Never

- ✘ Plan to or be involved in price-fixing by agreeing with a competitor of Toll's to fix price or any element of price, such as surcharges, discounts or pricing formulas
- ✘ Agree to fix, raise, lower or stabilise the pricing of goods or services sold or purchased
- ✘ Take part in or stay in the company of anyone discussing anti-competitive ideas or plans
- ✘ Provide or request bid or tender information from our competitors or agree to refuse particular customers or suppliers
- ✘ Enter into or participate in any anti-competitive arrangements involving allocation of markets or customers (for example, "hands off" or "no touch" understandings) whether directly or through an intermediary
- ✘ Obstruct a competition authority by providing false or misleading information, concealing or destroying documents or altering any third party to a competition law investigation.



Supporting you

People who require support will receive regular compliance training so they are clear about what can and cannot be discussed about competition, and what they should do if they are ever unsure.

In a global economy, conduct in one country can affect cooperation in another. Several regulators have successfully taken action based on discussions outside of their jurisdiction.

Any possible anti-competitive behaviour brought to the attention of Toll management by any person will be taken very seriously. You will not be criticised or penalised for any loss of business resulting from refusing to engage in and alerting management to anti-competitive conduct.

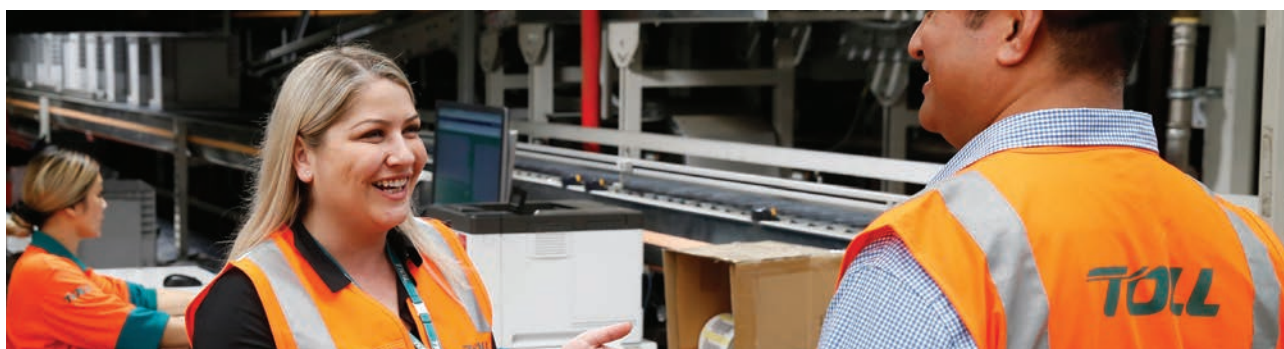


Our Toll Way

Toll acts with integrity in all its dealings with customers, suppliers and competitors.

If we want to be essential to our customers' success, they need to be able to buy our services on fair, competitive terms. Doing anything to get in the way of this may be seen to have short-term advantages but it ultimately damages our customers, and therefore, damages Toll. In turn this affects our other stakeholders, including our employees.

Everyone at Toll is expected to **act ethically and within the law** at all times and competition is protected under the law in most countries in which we operate. At Toll it is never ok to engage in anti-competitive agreements and practices prohibited by law, regardless of what may be accepted and/or common practice in the country or regions in which we operate.



What if...

You are at a trade association breakfast and the discussion turns to the terrible state of the market. Ideas are shared around the table and one in particular gets a lot of attention. Some of the pressure would be eased on business if there was a general agreement not to engage in price war for the next 12 months – or just until market conditions improved a little.

What would you do?

The best course of action in this situation would be to indicate and record your objection to the proposition and leave the conversation and event without delay. You should then inform your Divisional Director, Divisional Lead Counsel or Chief Legal Officer as soon as possible.

Conversations and/ or intentions like these are illegal and have the potential for serious impact on our customers, as well as on the reputation of individuals involved and the companies they represent.

More Information

Policies: [Toll Group Fair Trading Policy](#)

Manual: Toll Group Trade Practices Manual

Advice: Your line manager, Business Unit or Divisional Lead Counsel, or Chief Legal Officer



Environment

Toll is committed to reducing its environmental footprint while delivering superior services to our customers

The logistics industry moves and transports goods that are crucial to the growth and prosperity of every society. As a leader in this industry, Toll is focusing on its journey to sustainable logistics and transport. In doing so, we can play our part responsibly and meet the current needs of our communities without compromising the ability of future generations to meet their own needs. This can include potential environmental impacts from emissions, effluents, wastes, and resource usage arising from our operations.

We are tackling these impacts directly across our operations. New innovations are providing us with opportunities to improve the way we operate and minimise our environmental impacts in a smarter and more measured way.

In the short term, this means becoming cleaner, greener, quieter and smarter. We are achieving this by applying new technologies and practices which will reduce our consumption of non-renewable resources and reduce their associated carbon emissions and the risks they pose to climate change.

In the longer term, we will move to renewable energy sources as they become viable, and minimise emissions and other environmental impacts, so that we can run our operations in a more sustainable way.

Toll's growing scale and global focus, combined with our ability to deliver integrated logistics solutions, means that we have a significant role to play to reduce our environmental impacts.

We are all connected in this endeavour, and we must each play our part responsibly in addressing the environmental challenges that face us.

Always

- ✓ Adhere to our environmental policies and procedures
- ✓ Be personally environmentally responsible in your everyday actions, no matter what your role or where you work at Toll. Your thoughtfulness and actions count. For example, turn off unnecessary lights in your workplace and recycle waste
- ✓ Raise suggestions for better ways of reducing, reusing and recycling directly to your line manager
- ✓ Immediately report any environmental issues you become aware of to your line manager and Group Health, Safety and Environment

Never

- ✗ Ignore the responsibility we all share to consider the environmental impacts of everything we do
- ✗ Be afraid to alert management to any environmental or energy concern or offer your suggestions for improvement



Supporting you

We support our people to develop and maintain an environmentally responsible mindset in everything we do at Toll.

We encourage you to continue to raise suggestions to lessen our environmental impact and ensure that ideas are properly assessed and implemented wherever practicable. Any concerns raised are addressed with a view to prevention and ongoing improvement.

Collectively, our efforts to be environmentally aware will help us lighten Toll's environmental footprint.

Our Toll Way

Our strategic ambition: Be the leading logistics provider in the Asia Pacific region, offering end-to-end solutions to our customers.

Toll's Environment Policy commits the business to actively consider the use of alternative energy sources and low emissions technology, as they become economically viable. We seek to incorporate environmental and energy conservation considerations into our business decision-making processes wherever practical, particularly for capital allocation.

As a company with a global presence, we have a responsibility to play our part in mitigating the impacts of climate change.

What if...

You already consider yourself a good driver, you consistently meet delivery targets. While some of your current driving habits result in higher emissions than necessary, you know it will take time and effort to change and drive smarter.

What would you do?

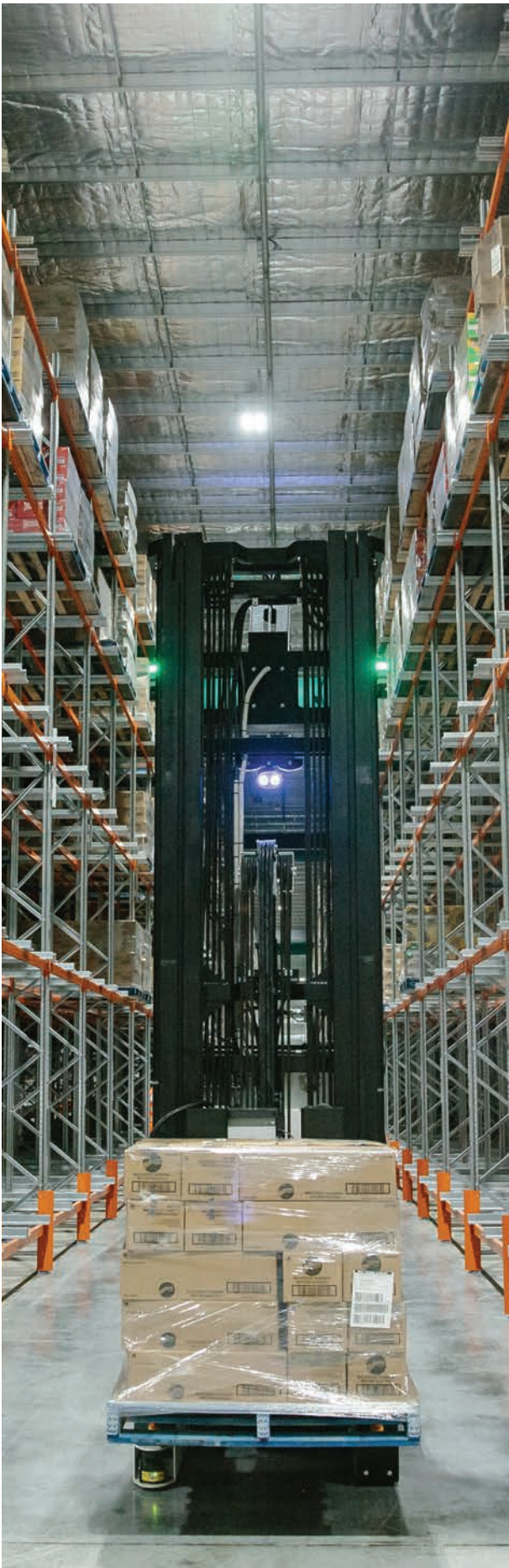
In line with Toll's commitment to be environmentally responsible and our core belief that how we achieve success is as important as success, you would be fully supported to make the changes in line with your driver training. We need to help reduce Toll's environmental footprint and reducing fuel emissions is key to this. Always discuss any concerns you may have about making changes to how you do things, including how it may impact achievement of your delivery targets or any other Key Performance Indicators (KPIs), with your line manager.



More Information

Policies: [Toll Group Environment Policy](#)

Advice: Your line manager or Group Health, Safety and Environment



Conflicts of Interest

Our private activities and interests must not conflict with our responsibilities at Toll.

We must always be able to demonstrate that all decisions have been made in the best interests of Toll and free from personal bias. Nothing you do, professionally or privately, should conflict with your responsibilities to Toll, compromise the quality of your work performance or jeopardise your ability to make impartial business decisions in Toll's best interests. This means we need to manage any actual, perceived, or potential conflicts of interest.

A conflict of interest arises when you have a private interest (including a financial interest or a personal relationship) that could improperly influence, or be seen to influence, the objectivity or independence of your decisions or actions in the performance of your role and duties at Toll. Conflicts of interest are not static and may arise or cease when circumstances change.

For example, a conflict of interest may arise when your personal relationships, participation in external activities (including e.g., industry or trade associations) or interests in another commercial enterprise (e.g., a financial interest) influences, or could be perceived to influence, your decisions on behalf of Toll. A conflict of interest can also arise where someone with a close personal relationship to you could potentially gain from a decision that you may make on behalf of Toll, for example your spouse or partner, children, grandchildren, parents, siblings, nephews/nieces, in-laws, former partners, stepchildren or friends.

When performing your role and duties at Toll, you should always carefully consider whether your private interests could compromise or be perceived to affect your capacity to make independent decisions, or whether your loyalty may be divided.

All Toll employees must do everything possible to avoid conflicts of interest. In particular, the following situations should be avoided:

- Having a financial interest in or acting as a director, officer or employee for any competitor, customer or supplier with which Toll does business. This will include situations where someone with a close personal relationship to you – e.g., a spouse or partner or friends – has a financial interest in or acts as a director, officer or employee for any customer or supplier with which Toll does business;¹
- Accepting any offer or receipt of gifts or other benefits that could affect either party's impartiality, influence a business decision or lead to the improper performance of your responsibilities.
- Using Toll funds, facilities, equipment, personnel or know-how to benefit other private or business interests, including personal charitable endeavours.
- Being involved in personal relationships (whether with Toll personnel or others) which a reasonable person might believe would affect your ability to do your job or make decisions in the best interests of Toll and in accordance with our values. For example, it is inappropriate for a senior level employee to have direct or indirect reporting relationships and/or decision-making responsibilities in respect of individuals with whom they have a personal or familial relationship.
- Being involved in close personal relationships with regulators or government officials with authority to make decisions relevant to Toll's business.



Toll understands that situations giving rise to actual or potential conflicts of interest can and do arise from time to time and requires you to be open and honest about it so that, if necessary, suitable workarounds can be adopted. This allows such conflicts to be managed at the earliest opportunity.

¹ A financial interest in a publicly-traded company that does business with Toll will not be a conflict of interest if the value of the legal or beneficial interest is limited to ownership of publicly-traded shares which constitute less than 5% percent of the applicable class, or loans entered into in the ordinary course of the publicly-traded company's business on standard commercial terms (e.g., a home mortgage loan with a bank that Toll does business with).



In many situations, it may be appropriate for someone with a conflict of interest to excuse themselves from any further involvement in, or decision-making in relation to, the situation that gives rise to that actual or potential conflict. This would remove the potential for the person to influence, or be perceived to influence, their decisions on behalf of Toll. However, the potential conflict of interest should still be disclosed.

You must regularly consider the relationship between your private interests and your role and duties at Toll, and promptly disclose any actual, potential or perceived conflict of interest (including those involving close personal relationships) using the process outlined in the Conflicts of Interest Policy. As part of your disclosure, you will need to confirm that you have disclosed the conflict to your manager (or other relevant person within Toll) and describe the proposed treatment plan for the conflict.

Always

- ✔ Use only work-related facts when making decisions in your role with Toll.
- ✔ Immediately declare any situation you find yourself in which involves, or you think may involve, a potential conflict of interest.
- ✔ Excuse yourself from any decision-making process (including but not limited to customer, suppliers, employees or other third parties) where you, a friend or a family member have an interest that could influence your ability to make an objective decision in the best interests of Toll.
- ✔ Be aware of the potential for conflict of interest with regards to your personal relationships outside work and get approval before accepting an officer or director position with another organisation which may appear in conflict with your role at Toll.



Never

- ✘ Hold a material financial interest or act as a director, officer or employee for any competitor, customer or supplier of Toll without prior disclosure and written approval of the conflicts of interest treatment plan from Group Compliance. These situations must be avoided wherever possible
- ✘ Accept any offer, or gift or other benefit/s that could affect your, or the other person's or organisation's, ability to be impartial or influence a business decision
- ✘ Use Toll funds, facilities, equipment, personnel or know-how to benefit personal or business interests outside Toll without the prior written approval of Group Compliance
- ✘ Be involved in outside activities, such as personal relationships including with other Toll employees, which may affect your judgment, or which may interfere with your ability to do your job or make decisions on behalf of Toll



- ✘ Conceal or ask others to conceal, your potential conflict of interest from your managers
- ✘ Use your role at Toll to gain advantage for yourself or someone who you know in a personal capacity
- ✘ Be involved in the selection process, promotion or supervision of a close relative
- ✘ Appoint or award business to any party that you are personally or financially associated with unless they have been selected following a fair selection process overseen by an independent third party including internal stakeholders such as the Procurement Department with knowledge of your association.

Supporting you

Toll takes conflicts of interest seriously and will not tolerate anyone continuing a personal activity or involvement where it compromises decisions taken on behalf of Toll. We are aware these situations can arise and we will support you if you find yourself in an actual or perceived conflict and take immediate steps to disclose the actual or perceived conflict of interest relating to your position in the workplace or one of Toll's suppliers or customers.

Our Toll Way

We can only make fair and equitable business decisions where we are free from bias.

Avoiding conflicts of interests helps us live our values of Integrity by doing the right thing the right way at Toll.

What if...

Some work needs to be done on your site. You know your brother-in-law's business has the right skills and experience and could get the job done quickly and cheaply. It would save Toll money and time for you to use them. You don't have any direct involvement with the business, so no one would need to know that you are related.

What would you do?

You must not be involved in any way in any procurement process involving your brother-in-law's business. This would be a conflict of interest, as your family member would gain from the decision you make on behalf of Toll, if you were to give them the work. Standard procurement processes must be followed. You must also immediately disclose this potential conflict of interest.



More Information

Policies: [Toll Group Conflicts of Interest Policy](#)

Advice: Divisional Lead Counsel, Chief Legal Officer or Group Compliance



Health and Safety

We are safety obsessed.

At Toll we believe everyone has the right to get home safe. It's why we're committed to deliver a culture that prevents incidents and injuries to promote genuine care for the health, safety and wellbeing of our people, customers, communities and the environment.

At Toll we are all responsible for acting safely and this is a condition of employment for all at Toll. No task is so important that it can't be done safely.

Since 2017, Toll has shifted its safety focus from a set of safety rules to a culture that is Safety Obsessed. This shift to a 'safety-obsessed culture' means that everyone across Toll takes responsibility for safety in a common sense and practical way, rather than deferring to a set of written instructions.

The Safety Obsessed strategy encompasses many aspects – including culture and behaviour, safe work processes and technology.

We are promoting a culture of 'active care' through leadership and behaviour, supported by one standard for HSE across the business.

Each person is responsible for acting safely, without risk to themselves or others. Management is responsible and accountable for workplace health and safety.

To ensure everyone can do what is expected of them, regular training in safety is provided, as are the tools to help you work safely.

Always

- ✔ Immediately advise your line manager or occupational health and safety representative if you find yourself in a situation which you know, or think may, present a threat to you or someone else's health or safety
- ✔ Immediately report potential hazards, near miss incidents or other health and safety concerns directly to your line manager or occupational health and safety representative. Having this information is an opportunity for us to eliminate hazards in our workplace before someone is injured
- ✔ Ensure you know how to do your job safely; if you are ever unsure or have questions, speak with your line manager for assistance or for further training
- ✔ Ensure you know your obligations with respect to your health and safety – and the health and safety of your fellow team members
- ✔ Follow work procedures that apply to your role at Toll



Never

- ✘ Be afraid to stop and ask questions if you are unsure of the task you are doing
- ✘ Put yourself in a situation that poses a threat to your health and safety or anyone else's in your role with Toll
- ✘ Take short cuts or ignore your job procedures
- ✘ Ignore hazards or near miss incidents

Supporting you

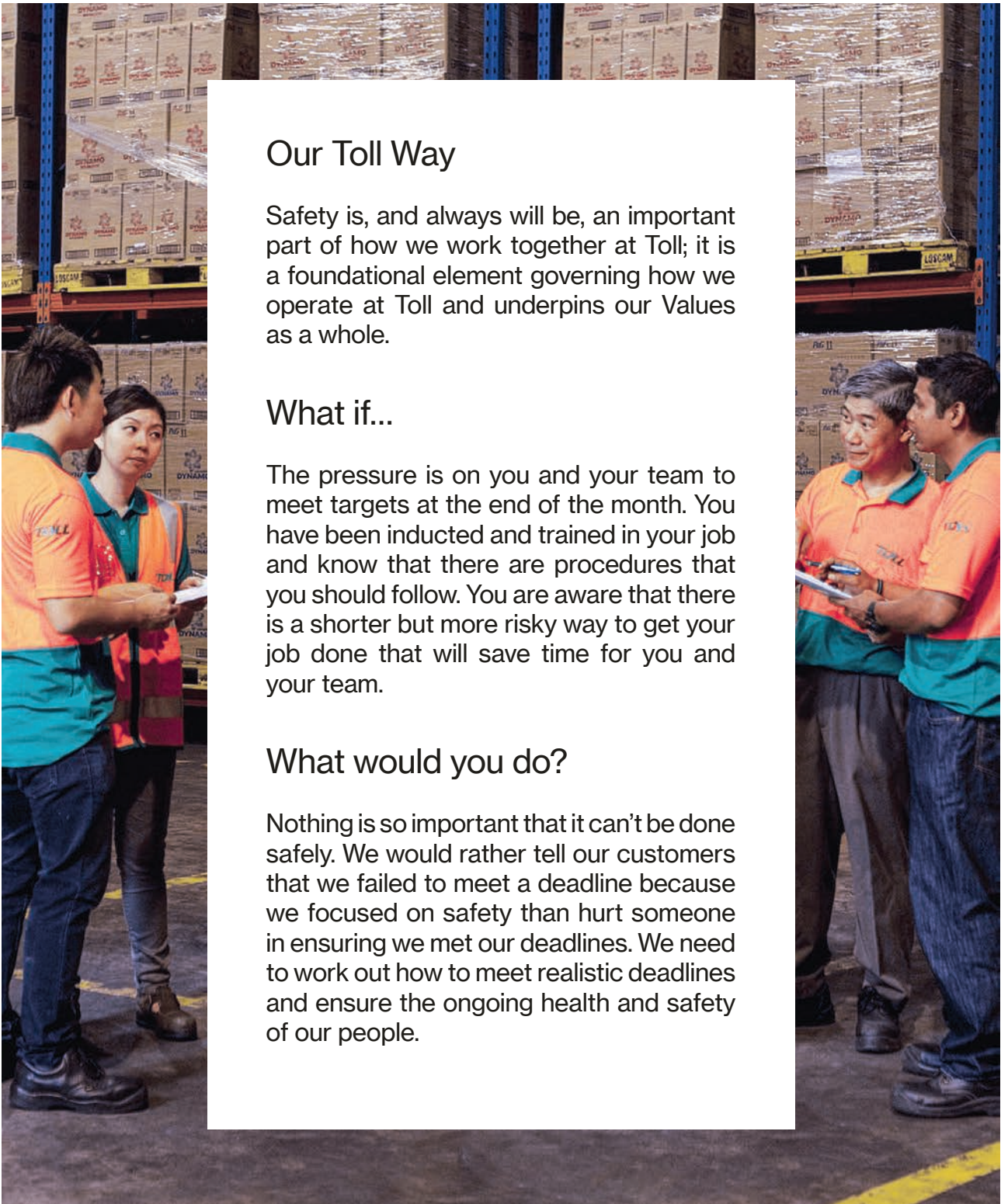
Toll ensures its employees, contractors, customers, and visitors all understand their obligations with respect to health and safety.

We supply you with the necessary induction, training, resources, facilities and equipment for you to work safely.

Any concerns regarding health and safety or suggestions for improvement raised by you will be taken seriously and actioned as appropriate.

We also believe that everyone who works with us – from our office-based employees through to our drivers and warehouse staff – has a role to play in ensuring our people return home safely.

Toll drives continuous improvement in health and safety through the monitoring of safety objectives and targets. We consult and engage with all of our stakeholders and continuously monitor, audit and review our health and safety management system to ensure ongoing improvement.



Our Toll Way

Safety is, and always will be, an important part of how we work together at Toll; it is a foundational element governing how we operate at Toll and underpins our Values as a whole.

What if...

The pressure is on you and your team to meet targets at the end of the month. You have been inducted and trained in your job and know that there are procedures that you should follow. You are aware that there is a shorter but more risky way to get your job done that will save time for you and your team.

What would you do?

Nothing is so important that it can't be done safely. We would rather tell our customers that we failed to meet a deadline because we focused on safety than hurt someone in ensuring we met our deadlines. We need to work out how to meet realistic deadlines and ensure the ongoing health and safety of our people.

More Information

Policies: [Toll Group Health and Safety Policy](#), [Toll Group Environment Policy](#), [Toll Group Dangerous Goods Policy](#), [Toll Group Drugs and Alcohol Policy](#), [Toll Group Workplace Rehabilitation Policy](#)

Advice: Your line manager, Business Unit or Group Health and Safety representative



Corporate Security and Crisis Management

Toll is committed to providing a safe and secure working environment for employees, customers and visitors to our facilities.

We all have an obligation to maintain a safe and secure environment to ensure that we keep each other, our assets, information and freight, safe and secure. This includes preventing theft, misappropriation, damage or misuse of our assets.

Toll provides protection against security threats and risks by implementing processes and procedures to manage security risks and to reduce security incidents.

Customers are at the centre of our business and their assets and freight must be secure and protected. It is vital that Toll meets customer expectations, security contractual obligations and regulatory requirements.

Toll's Critical Incident Management and Business Continuity program defines team structures, processes and resources that Toll will deploy in response to critical incidents which includes site emergency response plans.



Never

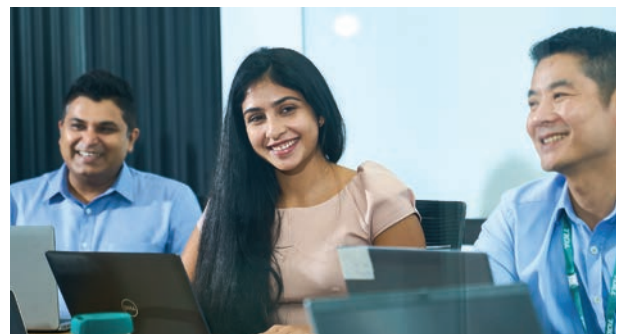
- ✘ Ignore security concerns or lack of security procedures that could pose a risk to Toll employees or assets
- ✘ Enter into a fraudulent or illegal transaction or fail to report fraud or any other misconduct that you become aware of
- ✘ Allow unauthorised persons to enter a Toll site
- ✘ Use Toll's or a Toll customer's assets for personal gain
- ✘ Leave your computer or mobile device unlocked when not in use
- ✘ Dispose of, sell or donate Toll assets without approval
- ✘ Engage a security supplier without first consulting with Group Security
- ✘ Act in a way that is against the law, or that breaches Toll Policies

Always

- ✔ Inform yourself about Toll's security policies and procedures
- ✔ Protect Toll's assets to prevent theft, fraud, misappropriation, damage or misuse
- ✔ Be vigilant to security threats, including lack of security controls
- ✔ Wear your Toll Employee ID card, ensure visitors are signed in, display a visitor card and are accompanied on Toll sites
- ✔ Immediately report any lost or stolen devices
- ✔ Report security concerns and incidents using the [Security Incident Report Form](#)

Supporting you

Toll participates in a number of security programs to keep informed of global security issues, incidents or events which could impact Toll. The Security Framework provides policies, guidelines and processes to ensure that security best practices are implemented in our business.



Our Toll Way

Security ensures that safe work practices and conditions are an integral part of Toll's operation. We support business unit managers to identify and mitigate security risks by conducting security risk assessments.

We uphold the Toll Group values and conduct investigations into misconduct or policy breaches to ensure that employees act ethically and within the law.



What if...

What if you are approached by a work colleague who offers you to buy customer product that they have removed from the warehouse?

What would you do?

You should immediately report this to your supervisor, identifying those responsible. The matter must be reported to Group Security using the online [Security Incident Report Form](#) for investigation.



More Information

Policies: [Toll Group Security Policy](#), [Toll Group Serious Misconduct Policy](#), [Toll Group Background Screening Policy](#)

Advice: Your line manager, your Business Unit or HR Manager or Group Security



Intellectual Property

There can be serious legal consequences to using intellectual property that belongs to others or sharing intellectual property that belongs to Toll without proper approvals.

Toll is committed to developing new and innovative ways to deliver superior solutions for our customers. We can only invest in developing new processes, equipment and know-how to do this if we can protect that investment.

Intellectual Property (IP) includes patents, copyright, trademarks and trade secrets. If you create IP of any kind in your role with Toll it remains the property of Toll during and after your employment or engagement comes to an end.

Toll's IP is among our most valuable assets. For this reason, IP that belongs to Toll must be treated in exactly the same way as Toll property you can see or touch such as our transport vehicles or office equipment.



Always

- ✔ Be aware when you are creating new or using existing Toll IP
- ✔ Be conscious of taking all required steps to protect Toll's IP when discussing or sharing it with other parties such as suppliers or customers
- ✔ Return all IP to Toll once your employment with Toll has come to an end
- ✔ Be respectful of other parties' IP when doing your work at Toll. For example, if you wish to use the IP of any other organisation, such as a customer logo in our marketing material, make sure you have their written consent before doing so
- ✔ Contact your Lead Counsel if you need assistance or are ever unsure



Never

- ✘ Use IP that you have developed in your work with Toll with a subsequent employer
- ✘ Use stolen IP, such as pirated software, at any time or for any reason in your job with Toll
- ✘ Use IP that you may have developed under a previous employer in your work with Toll, without your previous employer's written consent



Supporting you

Toll will ensure that you are properly resourced to do your work without needing to inappropriately use IP of another organisation.

If you develop new ideas, processes or equipment which needs protection, contact your Lead Counsel or the Chief Legal Officer, so that Toll can register the IP.

Our Toll Way

Respecting and protecting Toll property, including our IP, links to our core beliefs of **respect** and **acting ethically and within the law** at Toll.

By enabling you, Toll supports the creation and development of IP. This is underpinned by our belief in **Continuous Improvement**, one of our core values.

What if...

You have been using a Toll project management process developed and owned by Toll. After a year with Toll you are moving to take up a role with a competitor and it is tempting to take the Toll IP with you as it will be relevant to your new job. This will save you from having to develop or learn a new approach in your new role.

What would you do?

It is never acceptable to use intellectual property that belongs to other individuals or businesses without obtaining the proper approvals. If you create or use IP of any kind in your role with Toll it remains the property of Toll during and after your employment. If you are ever unsure what constitutes IP which is protected by law, speak with your Lead Counsel or the Chief Legal Officer before acting.



More Information

Advice: Your Lead Counsel or the Chief Legal Officer



Sanctions and Export Controls

Toll complies with all applicable national and international laws, regulations and restrictions when conducting its business around the world.

In particular, Toll complies with all national and international economic sanctions and export controls regulations (Sanctions), including:

Exports/imports to, from, through or dealings in property in a sanctioned country

Transactions, including but not limited to financial transactions, with governments, entities or individuals that are the subjects of Sanctions

Transportation of cargo to, from or through a sanctioned country

The transfer of restricted software, technical data or technology or any other intellectual property or so called “deemed exports” by whatever means.

Toll will not directly or indirectly engage, assist or participate in any non-transparent practice for the purposes of circumventing Sanctions laws or Toll’s Sanctions Policy.

Toll will also comply with export and import prohibitions reasonably required by its financiers where applicable.

Always

- ✔ Comply with every aspect of Toll's Sanctions Policy, including strict compliance with Sanctions in all countries and regions in which you conduct business on behalf of Toll
- ✔ Seek clarification from your local Business Compliance Champion or Group Compliance if you are unsure about any matter involving Sanctions as they may impact the work you undertake in your role with Toll

Never

- ✘ Undertake trade activity outside applicable national and international laws, regulations and restrictions when doing business on behalf of Toll, no matter where you are employed with Toll
- ✘ Have any business dealings with individuals, entities or governments which are subject to Sanctions
- ✘ Start business in a new country without first checking to see if any Sanctions laws apply
- ✘ Undertake trade activity in breach of Toll's requirements, which may be more restrictive than the applicable law



Supporting you

Sanctions are a very complicated area of national and international law and non-compliance can result in serious consequences for individuals, businesses and governments. Rules governing Sanctions and to whom they apply also change on a regular basis.

For these reasons, ensure you are familiar with the [Toll Group Sanctions Policy](#) and procedures as it relates to your role.

Toll will assist you with any additional guidance or advice you may need. Speak with your local Business Compliance Champion or Group Compliance about any issue or query you may have regarding Sanctions.



Our Toll Way

How we go about achieving success is as important as success itself.

Sanctions are never put in place lightly and must be respected and upheld under law. The importance of compliance is underlined by Toll's core belief that **all employees are expected to act ethically and within the law at all times.**

The way in which you and Toll conduct business underpins our core value of **Integrity.**

What if...

You are working to win a new contract for work with a large regional business and part of the brief is that Toll will be expected to provide logistics support to every part of the business, including a region you know is currently subject to Sanctions.

It's not a full ban but trading with the region is restricted.

What would you do?

You should always comply with Toll Sanctions Compliance Program and related procedures which are meant to strictly comply with any applicable Sanctions and restrictions. Toll always complies with all Sanctions laws. If you are ever unsure, seek advice to the contacts below before taking any action or making any decision on behalf of Toll.



More Information

Policies: [Toll Group Sanctions Policy](#)

Useful link: [Group Compliance SharePoint – Sanctions Compliance Program](#)

Advice: Local Business Compliance Champions, Control Tower Team or Group Compliance



Information Systems

Toll provides a wide range of information systems and technology to support us to do our jobs. These systems, and all of the data stored on them, are Toll Group property.

Reasonable personal use of company phones, mobile devices and computer systems is generally allowed where they are supplied; however, check this with your line manager as it does depend on the nature of your role.

It is also important to consider the kind of information you share using Toll's information systems and technology. No one should feel uncomfortable or embarrassed because of what someone else is doing or sharing in a Toll workplace.

Toll employees and contractors that use any Toll information systems should be aware that Toll uses electronic surveillance systems in order to monitor and audit the use of all these systems.

All users of Toll IT equipment and apps are bound by the IT Acceptable Use Policy. This sets out expectations and responsibilities for you when operating these devices.

Always

- ✔ Carefully consider whether your intended personal use of Toll equipment can be considered reasonable. If it takes up too much of your time, has the potential to damage the Toll network or relevant system, is going to incur any additional cost to Toll, is illegal or unethical you should not proceed
- ✔ Check with your line manager or local IT representative if you are unsure about any issue related to your use of Toll information systems and technology
- ✔ Let your line manager or Group HR know if you are aware a colleague is viewing or sharing inappropriate material or is otherwise behaving inappropriately with regards to use of Toll's information systems or equipment
- ✔ Keep any customer or Toll sensitive information secure and comply with IT security policies and standards
- ✔ Immediately report any lost or stolen devices



Never

- ✘ Use Toll information technology systems to view or send inappropriate material within Toll or externally, including pornographic or sexually explicit material or material that promotes violence, hatred, terrorism or intolerance of others
- ✘ Be afraid to bring to the attention of management any misuse of Toll information systems or equipment
- ✘ Provide your password to others, including your line manager
- ✘ Use another person's IT account

Supporting you

Everyone has the right to feel respected at work. Toll will support you with regard to any issue that may make you feel unsure or uncomfortable about what is going on in your workplace without fear of consequence. Refer any concern to your line manager or IT representative.

You are given access to and can use Toll information systems and equipment to do your job. Trust is placed in you to respect that property and be aware of what is acceptable usage, including any personal usage. If you are ever unsure, speak with your line manager or IT representative.

Our Toll Way

Unauthorised, inappropriate or misuse of Toll information systems or equipment goes against our core belief that **if we show other people respect, we will be respected**. This applies to Toll as a company and to each of you as Toll employees.

The proper use of Toll information systems and equipment by Toll people also upholds our values of Integrity and Trust.

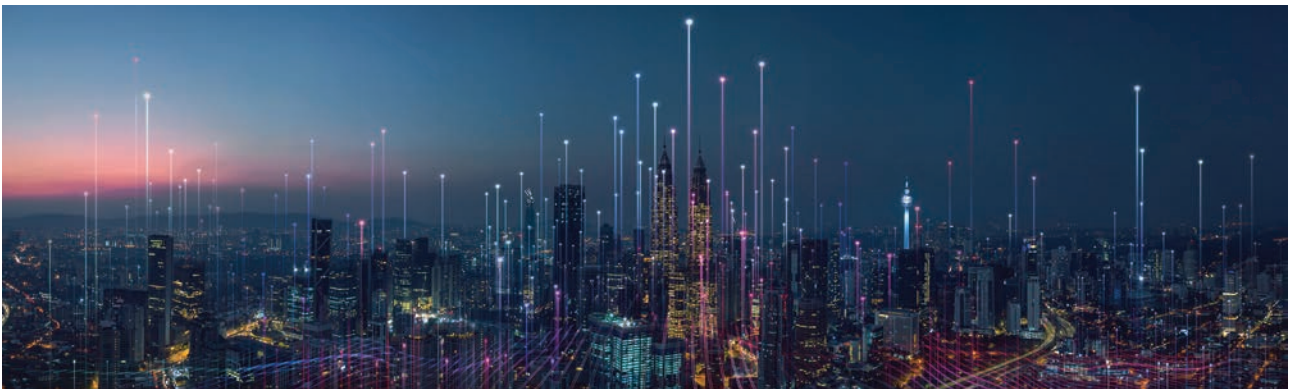
What if...

You have been part of your Toll work team for years but recently someone initiated offensive jokes being circulated via email. The jokes are mostly in bad taste, and you find their content embarrassing, offensive and discriminatory. Your line manager isn't on the distribution list, and you don't want to get any of your workmates into trouble.



What would you do?

In situations like this you should inform your line manager immediately given the potential for others like you to take offense and worse, not feel comfortable in their workplace. You can also feel confident that in keeping with Toll's grievance procedures your confidentiality will be respected. You should always feel respected in your workplace and Toll will take any breach of this right seriously.



More Information

Policies: [Toll Group Information Technology \(IT\) Acceptable Use Policy](#),
[Toll Group IT Security Policy](#)

Advice: Your line manager or Group IT



Our People

At Toll our focus is to harness our significant resources, know-how and passion to deliver optimal logistics solutions for our customers. That's why we put our people first. We know that our business can only be as good as our people, and we believe our people are outstanding.

From striving to attract, recruit and develop the best people, to creating every opportunity for you to contribute your knowledge and ideas, we believe people perform their best by being empowered, accountable and recognised.

Workplace Behaviours	42
Equal Opportunities and Managing Diversity	45
Travel and Expenses	48
Drugs and Alcohol	52
Privacy	55
Ethical Labour Practices	58





Workplace Behaviours

We are all responsible for the impact of our own behaviour on our colleagues, customers, suppliers and communities in which we operate.

Toll has set minimum behaviour standards which apply in all countries regardless of local law, customs and norms that may be less stringent. These standards reflect our values, and we require that you behave in accordance with these while acting for or on behalf of Toll.

Always

- ✔ Treat everyone in line with our belief that if you show respect, you will be respected as well as our values of integrity and trust, safety, teamwork, being open and transparent and continuous improvement
- ✔ Support and promote Toll's commitments to workplace behaviour
- ✔ Comply with the law
- ✔ Participate in workplace behaviours training
- ✔ Cooperate with workplace investigations with integrity
- ✔ Treat individuals equally, without bias or abuse of authority, and in a non-discriminatory manner in all aspects of employment such as recruitment, compensation/benefits, training, promotion, transfer and termination

- ✔ Use only work-related facts when making decisions in your role with Toll
- ✔ Speak up if you see inappropriate behaviour or if you are unsure what to do talk to your line manager, HR manager or contact the Toll Disclosure Hotline



Never

- ✘ Discriminate, harass, verbally abuse, bully, vilify, victimise, or act or threaten to act violently towards another employee or anyone else
- ✘ Retaliate against anyone you suspect or know has reported any unlawful or unethical conduct, including potential breaches of the Code or Toll's policies
- ✘ Have a direct or indirect reporting relationships or decision-making responsibilities for individuals with whom you have a personal relationship
- ✘ Act in a way that is against the law. In many countries' workplace bullying and harassment is punishable by law
- ✘ Put up with unlawful or unethical workplace behaviour. If you feel victimised or see this type of behaviour in the workplace, follow the appropriate channels to raise your concerns
- ✘ Improperly use your role at Toll to gain an advantage for someone you know in a personal capacity



Supporting you

Our commitment is to provide a workplace that is free from discrimination, bullying, harassment, violence and vilification and take steps to prevent inappropriate behaviours.

Toll will support and guide anyone who immediately discloses a personal relationship that may be an actual or perceived conflict of interest relating to their position in the workplace and advise them of the appropriate manner to comply with Toll's Conflicts of Interest Policy.

By making all people associated with Toll aware of our values, and providing appropriate training throughout Toll, we can all have a profound impact on supporting each other in the workplace.

Our Toll Way

Acting with Integrity and Trust and within the law and treating others with respect are all part of our core beliefs. Our workplace behaviour expectations are centred around these key themes and expectations.

We believe that if you are not being treated fairly that you have the right to be open about your concerns and we commit to listening to you and where appropriate to take action to align with Our Toll Way.



What if...

You are a female working in a male dominated environment. You are frequently called names or hear people referring to you using derogatory terms. While it makes you feel uncomfortable, you are the only woman in the workplace and don't want to make a fuss as it will be obvious who has made the complaint.

What would you do?

You should never feel uncomfortable in your workplace and should always be able to raise your concerns.

While it can be challenging to raise issues like this, it's likely you're not the only one who is feeling uncomfortable. You should at first try to resolve the issue with the individual involved. If that does not resolve the situation then bring this issue to the attention of your line manager. If you cannot speak to your manager about this talk to your Business Unit or Divisional HR representative. As an organisation we do not condone this behaviour and will seek to rectify it as soon as possible.

More Information

Policies: [Toll Group Workplace Behaviours Policy](#), [Toll Group Conflicts of Interest Policy](#)

Advice: Your line manager, Business Unit or Divisional HR representative



Equal Opportunities and Managing Diversity

Respecting others is one of our core beliefs at Toll. We value and encourage the contributions of team members with different capabilities, experiences and perspectives.

Ensuring equal opportunity in employment is about treating employees and potential employees fairly and equitably regardless of age, nationality, race, gender, political views, industrial relations activity, employment status, religious beliefs, sexuality, gender history, marital status, pregnancy or potential pregnancy, breast-feeding, carer status or family responsibilities, physical features, personal associations or cultural background.

Everyone at Toll should be treated fairly, with respect and dignity. At Toll we respect human rights and take steps to ensure that human slavery or abuse do not knowingly enter our supply chain. It is also expected that anyone who acts against this policy is reported.

Always

- ✔ Welcome others in a respectful manner to their work environment without bias based on personal circumstances or attributes
- ✔ Behave with integrity, courtesy and respect for others
- ✔ Complete training provided by Toll in respect of diversity and our equal opportunity standards and practices
- ✔ Bring to the attention of management any actions or behaviour which is not in line with our commitment to equal opportunity and diversity at Toll

Never

- ✘ Show lack of regard or disrespect to anyone based on their personal circumstances or attributes
- ✘ Accept or ignore behaviour by others that is in conflict with Toll's view of equal opportunity and diversity – whether it applies to you or to someone else at Toll
- ✘ Refuse to work or cooperate with others because of characteristics covered by this policy or other characteristics protected by law



Supporting you

We are all responsible for Toll's Diversity and Equal Opportunity Policy. Each of our divisions and business units has the responsibility to communicate our expectations to all employees and contractors under Toll's operational control. We are all expected to support and promote the policy in the way we behave in the workplace every day.

Toll's recruitment and selection processes are designed to attract a diverse range of applicants and to recruit the best people based on relevant job criteria and without regard to individual attributes, background or circumstances.

We seek to ensure our workplace is welcoming, inclusionary, free from inappropriate conduct and take the action required to prevent or stop unacceptable behaviour.

We ensure this by:

- Providing appropriate training
- Expecting everyone to comply with all applicable laws that govern discrimination and harassment in the workplace
- Having discipline and grievance procedures to capture any actions or behaviour not in keeping with our beliefs and values



Our Toll Way

Our commitment to equal opportunity and diversity is essential to **harnessing our significant resources, know-how and passion to deliver the best outcomes for you, our customers and Toll.**

It reflects our core beliefs of **showing respect to others and being respected in return**, as well as the belief that people perform best when they are empowered, accountable and recognised.

What if...

You are part of a project team that meets every Friday to assess the week and plan ahead. However, a new team member has indicated that they can't attend the meeting because of their religious beliefs. Changing the meeting will inconvenience the rest of the team.

What would you do?

Everyone deserves to be respected in their workplace, regardless of their personal choices or beliefs. For this reason, you should not exclude your team member but use the opportunity to speak with your line manager and fellow team members about other ways the team could manage their meeting schedule to ensure the new team member's views are heard. It's about managing the interaction and communication between team members, not leaving someone out.

More Information

Policies: [Toll Group Diversity and Equal Opportunity Policy](#), [Toll Group Ethical Employment Policy](#)

Advice: Your line manager, Business Unit or Divisional HR representative



Travel and Expenses

Toll provides Group-wide guidelines for travel that set boundaries for travel expenses, while allowing our people to take personal responsibility in their day-to-day work.

The Toll Group Travel Management Policy applies to all Toll Group employees, family members of employees, consultants and contractors required to book and undertake business-related travel on behalf of Toll. The Toll Group Employee Expense Management Policy applies to all Toll Group employees and contractors who incur travel and business expenses when conducting business on behalf of Toll.

Given the level of our business travel across Toll, we are able to work with vendors to get the best possible value. It's therefore important that you use these suppliers to ensure we can benefit from economies of scale for business-related travel.

Expense management is also an important process for an organisation of our size. Being transparent and managing the system appropriately results in useful expense management data and helps us to better budget for expenses in the future.

Always

Take personal responsibility for ensuring that they are appropriately prepared for travel to minimise personal risk, including considering any current and relevant travel advice provided by International SOS (ISOS), and arranging for a formal travel pre-briefing with International SOS and Group Security prior to travel to High or Extreme risk countries.

Book travel based on the following:

- ✓ All travel must be booked a minimum of 7 days in advance for domestic travel and 14 days international travel
- ✓ “Lowest logical fare” as quoted by the Travel Management company (TMC) must be used for booking travel. Bookings are not to be made on the basis of traveller preference or alignment to loyalty programs

For domestic air travel:

- ✓ Personnel at E job level: Business class can be booked for flights greater than 5 hours; Economy/Coach class for 5 hours or less
- ✓ For all other personnel: Economy/Coach class is to be used for all domestic air travel

For international air travel:

- ✓ Personnel at E job level: Business class can be booked for flights greater than 5 hours; Economy/Coach class for less than 5 hours
- ✓ For all other personnel: Business class can be booked for flights greater than 8 hours; Economy/Coach class for less than 8 hours

- ✓ Travel between Singapore and Australia will be in economy class (excluding GLT and Board); Business class can be booked for overnight flights. All overnight flights must be approved by a GLT member, no exceptions
- ✓ Managing Director to determine appropriate class of travel for the Board and Chairman

Book bus, rail and ferry tickets based on the following:

- ✓ Less than 4 hours in Standard/Economy/Coach Class (excluding GLT and Board)
- ✓ Business Class for greater than 4 hours
- ✓ Board and GLT are entitled to Business Class
- ✓ Travellers are expected to check with local country management when travelling in countries where standard class may not be suitable for business, due to safety and personal security, or where service quality/sanitation places the traveller at risk
- ✓ Use the Group preferred accommodation where overnight accommodation is required. Non-preferred hotels should only be used where preferred hotels are full or where there are no preferred hotels. In all cases, the rates should be within the defined ‘city-cap’ for the location
- ✓ When booking vehicles or ground transfer, use the preferred Toll vendor and where the safety of the traveller will not be compromised, consider the cost effectiveness of using an Uber or equivalent

- ✓ No upgrades should be taken for travel (air, rail, bus, vehicle hire, hotel accommodation etc) if it comes with any additional charges
- ✓ Travel to High / Extreme Risk Countries must be approved by Group Security

Ensure all travel is booked (i.e., flights, accommodation, car hire, transfers, rail tickets, ferries) via the preferred TMC. Where services cannot be provided by the TMC, bookings can be made direct with suppliers, but itineraries must be entered into the ISOS Personal Travel Locator where travel is international.

Ensure travel (and any deviation from Travel Policy) is appropriately approved by a person authorised under the Toll DOA to approve the proposed travel prior to the commencement of travel, or as soon as possible if changes are required during the course of travelling.

Ensure Travel related expenses are incurred appropriately and fully receipted and the use of company corporate cards is in line with this Policy and the Expense Management Policy and Expense Management Standard

Toll prohibits

- Any more than half of GLT or the Group Board travelling together in one plane or vehicle
- Any more than half the GLT or the Group Board staying in one property in high-risk locations
- Any more than ten (10) travellers from a single Division or Business Unit travelling together without relevant Divisional Director approval

Never

- ✗ Ignore any aspect of the Toll Group Travel Management Policy when planning, booking or undertaking business-related travel on behalf of Toll. We will conduct investigations of any alleged or suspected breaches of this policy. Breaches of this policy may lead to a variety of outcomes; for example, non-reimbursement of expenses and restricted travel through to (but not limited to) counselling, formal warnings or dismissal



Supporting you

The Toll Group Travel Management Policy is designed to ensure Toll does not incur unnecessary or excessive travel costs. Equally, the policy is designed to minimise your risk when travelling on behalf of Toll.

In keeping with these principles and Toll's belief that people perform best when they are empowered and accountable, you will be provided with any advice and support you may need to comply, irrespective of your role, work location or any other circumstance.

If you are ever unsure about any aspect of travelling on behalf of Toll please seek advice from your line manager, HR representative or Group Procurement.

Our Toll Way

Toll manages costs across the business, including travel management costs, as part of good business practice.

The Toll Group Travel Management Policy is in keeping with our **commitment to the Safety** of all our people, as well as maintaining our values of **Integrity and Trust**.

What if...

You need to make a quick trip to attend a Toll business partner meeting in a location just a two-hour plane trip away. The meeting has come up at short notice and you need all the time you've got to prepare for it. You haven't had to travel for your Toll job as yet, but you travel all the time personally and you know you could easily make the necessary bookings yourself. You even have a favourite place to stay in town. A colleague suggests you might also 'get away with' travelling business class.

What would you do?

In keeping with the Toll Group Travel Management Policy, you must make all your travel bookings through the approved Toll Travel Management Company in your area, irrespective of other circumstances. Business class travel can only be done as per the rules indicated above. Never be tempted to do anything on the basis you might 'get away with it'. This is not an ethical way to approach any decision in your role with Toll and in this instance, you also risk consequences as serious as termination of employment.

More Information

Policies: [Toll Group Travel Management Policy](#), [Toll Group Employee Expense Management Policy](#)

Contacts: Your line manager, Business Unit or Divisional HR representative, or Group Procurement



Drugs and Alcohol

Presenting fit for work every day means being free from fatigue, physical or psychological impairment which may impact your ability to work safely, including not being under the influence of drugs or alcohol.

Toll's Drug and Alcohol (D&A) Policy applies to all employees, contractors engaged by Toll (Toll Worker) and any visitors to Toll sites while onsite or while performing any duties on behalf of Toll.

Toll's operations are inherently complex and involve the continued interaction of people and machinery. As such, it is imperative that for your safety and the safety of others, we must always be alert and be able to do our jobs safely.

Toll cares about the welfare of our people and supports drug and alcohol rehabilitation. We encourage anyone who thinks they may have a drug or alcohol dependency issue to come forward. If we know about it, we might be able to help. If we don't know, we can't help, and you may pose a risk to yourself and others.

Always

- ✔ Avoid inappropriate use of drugs or consumption of alcohol that interferes or may interfere with the outcomes of your employment duties or the provision of a safe work environment for all employees at Toll
- ✔ Be aware of drinking responsibly at social and business functions where you are representing or are a guest of Toll
- ✔ Speak out if you feel a colleague is under the influence of drugs or alcohol. Tell your manager so they do not put themselves or others in danger

Never

- ✘ Possess, solicit, sell, distribute or consume illicit or non-prescribed drugs while on the job, or when it may affect you on the job at a later point in time. Depending on the nature of a drug or extent of alcohol consumption, you can still be physically and/or mentally affected many hours later
- ✘ Be under the influence of illicit, prescribed or non-prescribed drugs or alcohol to a level where it could risk injury to any person including you. This applies to any role at Toll
- ✘ Consume alcohol in any Toll vehicles or within any Toll operational area or on any Toll site

Supporting you

Toll will:

- Provide appropriate awareness and/or training programs to its people on the effects of drugs and alcohol
- Implement a structured random drug and alcohol testing program. We reserve the right to test those involved in any workplace incident or where a view is formed that a worker may be impaired by drugs or alcohol
- Reserve the right to discipline any Toll Worker who breaches the Toll Group Drugs and Alcohol Policy

Our Toll Way

The Toll Group Drugs and Alcohol Policy reflects our commitment to the health and safety of our people. We believe all injuries are preventable and everyone has the right to go home safely.

Carrying out our employment duties safely and to the best of our abilities also ensures we uphold our shared values of Integrity and Trust.

What if...

You are good friends with a fellow team-member who is going through a tough time personally and you are aware they are drinking heavily. While they are not in an operational role and you don't think it is obviously impacting the quality of their work, they turn up to work with alcohol on their breath.

What would you do?

You should remind your friend that Toll is an alcohol and drug free workplace and arrange for them to immediately leave the workplace. If they drive to work arrange a taxi to take them home or ask for a family member to collect them. You should also make management aware of what has occurred.

Even if they are not in an operational role, they are breaching Toll policy and putting team members like you under the pressure of being aware that their situation is unacceptable in a Toll workplace. As the person bringing such a situation to the attention of management your confidentiality could be protected under Toll's grievances procedures.

More Information

Policies: [Toll Group Drugs and Alcohol Policy](#)

Contacts: Your line manager, Business Unit or Divisional HR representative, or Wellbeing Team



Privacy

Toll values the privacy of every individual and we only use personal data for the purpose for which it was collected.

Personal data is information relating to an individual who can be identified by that information alone, or in combination with other information that Toll holds.

To enable us to fulfil our responsibilities as an integrated provider of logistics and, in the case of our Toll People and Toll Transition's businesses, our responsibilities as a supplier of recruiting and relocation services, Toll collects personal data about its employees, clients, suppliers, sub-contractors and others with whom it deals, to enable Toll to effectively conduct its businesses.

We take steps to protect personal data we collect, and we do not retain personal data for longer than is legally necessary.

Always

- ✔ Ensure that you only collect personal information from a person if it is necessary for you to do your job and where you have received the required consents
- ✔ Make sure you only use personal information in a way which is consistent with the reason provided for collecting that information
- ✔ Ensure that individuals have a genuine opportunity to access and, if necessary, correct any personal data that Toll holds in relation to them
- ✔ Maintain appropriate administrative, physical and technical safeguards designed to protect personal data we hold against accidental, unlawful or unauthorised destruction, loss, alteration, access, disclosure or use

Never

- ✘ Collect personal information for any reason other than for business purposes and to do your job
- ✘ Allow access to that information by any person/s other than those who need access to that information to do their job



- ✘ Use personal information for a reason other than the reason stated to an individual when the information was collected, unless you have notified and obtained approval from that same person

Supporting you

The Toll Group Privacy Policy is periodically reviewed. The policy, which explains our standards and expectations for managing personal information, can be found on our intranet and website.

We take steps to ensure all personal information held in relation to our stakeholders, such as employees and customers, is dealt with respectfully in keeping with this policy. The policy also upholds the privacy laws in every area in which we operate.

Any concern regarding the collection, transfer, use or management of personal information at Toll will be taken seriously and followed through with a view to ensuring compliance with our policy and to focus on continuous improvement of our processes.



Our Toll Way

Toll's commitment to collect personal data about a person only in a manner that is fair, lawful and for business purposes is in keeping with our core beliefs of **acting ethically and within the law, as well as showing respect**. It is also consistent with our values of **Integrity and Trust, Openness and Transparency**.

What if...

A colleague from another business unit at Toll contacts you about an idea for a direct mail campaign to win some new business. They ask you to pass on your customer database to use for the campaign. The customers on your database are individuals and would be contacted about a Toll product that is different to what they were originally approached for when their personal details were collected by your department. You are not sure if they were made aware that this might be the case when they provided their information initially.

What would you do?

This should raise your immediate concern because the personal information contained in your department's customer database may have been collected from Toll customers for a very specific product offer or purpose. The direct mail campaign for which your colleague is seeking to use your database contains an entirely different service offer. It is disrespectful to our customers, as well as unethical and against privacy laws in most countries in which Toll operates, to share personal information in this way. You should consult your Lead Counsel before agreeing to provide your department's customer database to your colleague

More Information

Policies: [Toll Privacy Policy](#)

Contacts: Your line manager, Business Unit or Divisional HR representative, or Wellbeing Team



Ethical Labour Practices

Toll respects the rights and interests of the communities in which we operate and the individuals with whom we interact and complies with employment and anti-human trafficking and modern slavery laws in every country in which we operate. We strive to demonstrate the highest ethical principles in relation to how we treat our people

Our ethical employment principles apply to all employees, contractors, agents and joint ventures involving Toll Group. In summary:

Toll strives to protect the health and safety of our people and business partners, and we enforce our Health and Safety Management Standards globally.

Toll respects ethical labour practices and has a zero-tolerance approach to any form of modern slavery in our operations or supply chain, including settings where a person cannot refuse or leave work because of deceptive, threatening, or coercive practices. We are committed to treating all employees and business partners with respect and dignity, and to maintaining appropriate safeguards against the mistreatment of persons involved in our business or supply chains.

Toll is committed to creating and promoting a diverse workplace where our people are treated equally and are encouraged and free to bring a variety of approaches and ideas to their roles.

In respecting human rights, we show consideration for the rights and interests of our people and business partners and treat everyone with respect and dignity.

We recognise every person's right to be, or not to be, a member of or to be represented by a union or labour organisation.

At a minimum, Toll complies with all local employment legislation including minimum wages and maximum hours of work, and we endeavour to offer our male and female employees equal pay for equal work.

Toll does not condone or engage in, forced, youth or child labour. Toll will not employ a person that has not yet reached the age of 15.

We take reasonable steps and checks to ensure that potential employees are legally eligible for employment in the country in which they seek employment with us.

Toll prohibits slavery or human trafficking – including that involving forced or compulsory labour, debt bondage, and servitude – for any purpose.

Always

- ✔ Raise any concerns you have of any behaviour which is inconsistent with the principles set out above
- ✔ Ensure you are familiar with Toll's policies related to the principles above.² These are summarised in the relevant sections under this Code
- ✔ Be aware of local labour laws and follow these
- ✔ Respect the rights of others, including those of children and migrant workers
- ✔ Check that recruiters comply with anti-trafficking requirements
- ✔ Provide an employee contract, recruitment agreement or any other required work document in writing (where one is required by law)





Never

- ✘ Accept any actions which are in conflict with, any of the principles set out above
- ✘ Use deceptive, threatening or coercive practices during recruitment or employment, or use recruiters or suppliers that do not comply with local labour laws or charge recruitment fees to potential employees
- ✘ Directly or through our suppliers engage or condone modern slavery practices (e.g., forced or compulsory labour, deceptive recruitment, debt bondage, human trafficking, servitude, child labour) in our operations and in the performance of any contract
- ✘ Be afraid to bring any matter which may be a violation of these principles to the attention of your line manager, Business Unit or Divisional HR representative or Group Compliance
- ✘ Use forced labour
- ✘ Destroy, conceal, confiscate, or deny an employee access to their identity or immigration documents, such as passports or drivers' licences

Supporting you

Toll's senior management is responsible for ensuring these principles are disseminated and fully understood at every level throughout Toll.

Toll will not criticise or penalise employees for any loss of business resulting from adherence to these principles. Similarly, we do not penalise Toll persons who report their concern in good faith, even if on closer investigation these turn out to be unfounded.

Infringements are taken very seriously. All suspected breaches will be investigated. Anyone who fails to abide by these principles may face disciplinary action, including termination of employment.

Our Toll Way

The principles set out under Toll Group's Ethical Employment Policy and Anti-Human Trafficking and Modern Slavery Policy directly underpin Toll's core beliefs that **our people are our most important asset, people perform best when they are empowered, accountable and recognised, showing other people respect earns us respect**, and of acting **ethically and within the law in all business dealings**.

What if...

You discover that a Toll supplier which your department has worked with for many years employs child labour. Your local contact is not aware of this and assures you that the company does not undertake this practice in their part of the business – nor do they agree with the practice. The supplier already offers Toll competitive rates but offers you a payment to keep your business.

What would you do?

There are two issues that raise immediate concern in this scenario.

Firstly, a business that employs youth / child labour is not a business Toll will tolerate as a business partner and you should immediately raise your concerns to your line manager, Group Compliance, or relevant HR representative.

The second concern is that the supplier is offering you a kickback in return for you ignoring what is going on in their organisation. Toll does not condone the offering or acceptance of kickbacks, or benefits or bribes of any kind in return for business advantage. You should report it immediately to Group Compliance or via Toll Protected Disclosure Hotline.

More Information

Policies: [Toll Group Ethical Employment Policy](#), [Toll Group Background Screening Policy](#), [Toll Group Anti-Human Trafficking and Modern Slavery Policy](#), [Supplier Code of Practice](#), [Toll Modern Slavery Act Statement](#)

Contacts: Your line manager, Business Unit or Divisional HR representative, Group Compliance or via Toll Protected Disclosure Hotline



External Relationships

Our external relationships are central to our success.

In keeping with our commitment to act ethically and with integrity in all we do at Toll, we are open and transparent in how we build our relationships with our customers, suppliers and anyone else we deal with in our roles.

Gifts, Entertainment and Hospitality	63
Political Donations	67
Sponsorships and Charitable Donations	70



Gifts, Entertainment and Hospitality

We do not offer/solicit or accept/receive gifts, entertainment or hospitality that could affect our ability to make decisions on behalf of Toll objectively, fairly, with integrity and without bias.

Toll prohibits offering or soliciting giving or receiving gifts, entertainment or hospitality that could affect either party's impartiality, influence a business decision or lead to the improper performance of an official duty.

This applies to our relationships with customers, suppliers, officials, and anyone else we deal within our roles.

Toll employees may only give or receive gifts, entertainment or hospitality in accordance with Toll Gifts, Entertainment and Hospitality policy. In all cases, gifts, entertainment or hospitality must be an expression of goodwill, reasonable and proportionate, legitimate and transparent, and not intended to improperly secure a private or business benefit or advantage.

Always

- ✔ Think carefully and use your best judgement when offering or accepting gifts, entertainment or hospitality in your role with Toll. If in doubt, consider whether the gift would cause embarrassment to you, your relatives, or to Toll if it were reported publicly
- ✔ Consult and comply with the rules and procedures set under the Gifts, Entertainment and Hospitality policy
- ✔ Check with your Toll Leadership Team (TLT) member or Group Compliance if you are unsure about whether a particular offer to/from you is acceptable under Toll policy
- ✔ Ensure all applicable gifts, entertainment or hospitality you give or receive is approved and recorded via the online register



Never

- ✘ Offer, solicit or accept gifts, entertainment or hospitality that could affect you or the other party acting appropriately, fairly and without bias in your business dealings and decision-making
- ✘ Offer, solicit or accept gifts, entertainment or hospitality outside the limits set by the Toll Group Gifts, Entertainment and Hospitality Policy unless you have prior written consent from Group Compliance
- ✘ Offer, solicit or accept gifts, entertainment or hospitality of any kind to/from a customer/supplier while you are involved in a tender/negotiation process with them
- ✘ Offer, solicit or accept gifts, entertainment or hospitality which is or may be perceived by others as unethical or inappropriate

Supporting you

Toll works to ensure its people know their rights and obligations regarding the offer or acceptance of gifts, entertainment and hospitality and that everyone is accountable for their decisions and actions.

The relevant policies apply to everyone at Toll regardless of their role, job grade, seniority (including senior management and board of Directors) or what might otherwise be considered acceptable in their local country or region.

All gifts, entertainment and hospitality requiring approval or disclosure must be recorded in the online Gifts, Entertainment and Hospitality Register. The register may be audited at any time.

If you are ever unsure about a decision regarding offering or receiving a gift, entertainment or hospitality in your role, seek clarification from your local Business Compliance Champion, or Group Compliance.



Our Toll Way

In line with our belief that **how we go about achieving success is as important as success itself**, how we build our relationships with third party stakeholders is as important as the outcomes of these relationships.

We must always act with **Integrity** in our business dealings and be **Open and Transparent** in how we build relationships with our customers, suppliers and anyone else with whom we deal in the course of our work.



What if...

Your department needs to keep in regular contact with the tax department. A colleague suggests that it helps the relationship if you take them out to dinner once or twice a year.

What would you do?

Offering gifts, entertainment or hospitality to government officials is prohibited. You should continue to maintain a cordial and professional relationship with the tax department without offering any gifts, entertainment or hospitality.

More Information

Policies: [Toll Group Gifts, Entertainment and Hospitality Policy](#) and [Toll Group Anti-Bribery and Anti-Corruption Policy](#)

Advice: Business Compliance Champions or Group Compliance



Definition

Governmental or Elected Official includes any employee, contractor or official of any government body or any individual who has been appointed to an office or position within any government.

Political Donations

Toll is politically neutral and does not get involved in party politics at national, regional or local level.

Toll also does not contribute funds or any other financial or non-financial support to political parties, Government Officials or candidates for office.

To serve the best interests of our stakeholders, including our employees, Toll retains the right to represent our views to government on policy issues as they may affect our industry. We also reserve the right to bid for government contracts.

Always

- ✔ Follow all aspects of Toll's Code of Ethics when competing for government contracts
- ✔ Decline any requests for Toll to make a political donation
- ✔ Raise with your line manager, Country or General Manager any opinion that you think Toll ought to provide to governments on any issue and at any level. If approved, contact Group Corporate Affairs to discuss the best way to do this
- ✔ Let your manager or Group Compliance know if you or one of your close relatives hold a public role or office or one of your close relatives is standing for public office
- ✔ Check with Group Compliance before attending any function hosted by a political party.

Never

- ✘ Make a direct or indirect political donation of any kind on Toll's behalf
- ✘ Stand for public office without first informing Group Compliance. You are free to engage in political activity in your own time, however, Toll needs to know if a Toll employee holds a public position or is campaigning for one so we can manage activities to avoid potential conflicts of interest
- ✘ Purchase a table or ticket to a function which is organised by a political party, candidate or government (or opposition) official for the purposes of fundraising without first getting approval from Group Compliance.



Supporting you

Toll will at times represent its views to government on policy issues that may affect Toll and our many stakeholders (including our employees and others involved in our activities). We may do this as an individual company, or as part of an industry association representing the interests of our commercial sector, in order to serve the best interests of those stakeholders and to progress our business and/or industry.

Toll does not prevent any of its employees standing for public office but must be informed in order to manage activities to avoid any potential conflicts of interest.

Our Toll Way

Toll acts with **Integrity** and upholds the highest ethical standards in dealings with all our stakeholders, including government.

Toll's policy of not getting involved in party politics or making political donations reflects our core belief that **how we go about achieving success is as important as success itself**. This approach also upholds the integrity value of doing the right thing the right way

What if...

An opposition party is planning to introduce new licensing requirements that could make your part of Toll's business uncompetitive. For this reason, it is really important that the current party stays in power. The candidate for the ruling party has asked Toll to sponsor a fundraising event.

What would you do?

Always decline any request for a Toll political donation and never make a political donation on Toll's behalf. Toll doesn't engage in party politics, and it is particularly important to be clear about our political neutrality around election times. We may be concerned about an aspect of another party's policies, but we should always use the proper channels at Toll to represent Toll's views on policy issues.

More Information

Policies: [Toll Group Sponsorships, Political Donations and Social Investments Policy](#), [Toll Group Anti-Bribery and Anti-Corruption Policy](#)

Advice: Your Line Manager, General Manager, Country Manager, Lead Counsel, Group Compliance or Group Corporate Affairs



Sponsorship, Donations and Social Investments

Toll makes carefully considered charitable donations and sponsorships to support worthy causes and to give back to our communities.

Toll is proud to provide support to the communities we work in via a wide range of sponsorships and charitable activities. It is important that all sponsorships and social investment activities relate back to our core beliefs and values and align to the core principles of the Toll brand.

Donations we make may promote Toll's public image and support the communities that we operate in, but they are never made with the expectation of any specific favour in return, or to influence a Toll stakeholder for example a government official, journalist or customer.

Sponsorships on the other hand is a form of marketing in which a Toll would contribute to all or some costs associated with a community project or a program in exchange for brand recognition. It does not include donations or social investments.

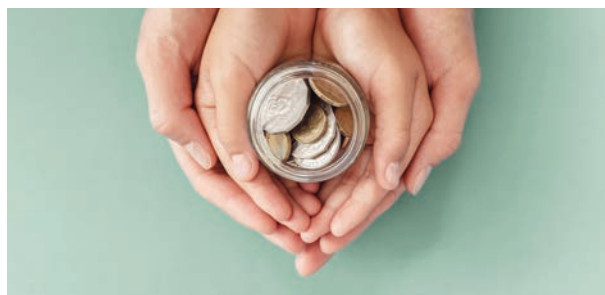
Always

- ✔ Carefully consider any decision or request to make a charitable donation to any organisation or enter into a Sponsorship on behalf of Toll, in line with the Toll Group Sponsorships, Donations and Social Investments Policy
- ✔ Ensure any donation or sponsorship you make on behalf of Toll is duly documented, registered and approved according to the approval process and authority matrix set in the Toll Group Sponsorships, Donations and Social Investments Policy



Never

- ✘ Make any donation on behalf of Toll without following the guidelines provided by Toll for doing so. If in doubt, please speak to Group Corporate Affairs, or the Group Compliance
- ✘ Make, or suggest Toll makes, a donation to any organisation where the purpose of that donation is to obtain a specific favour, or to influence a particular person or persons or future business decisions which relate to Toll



Supporting you

Toll is committed to the communities in which we work, and we support a broad range of community programs and initiatives through sponsorships and charitable donations.

We need to make informed, considered decisions about which organisations we support in order to optimise our support for the communities in which we operate.

Toll provides clear guidelines for considering or making charitable donations on its behalf in the Sponsorships, Donations and Social Investments Policy. We will consider all requests put forward by our people that meet the criteria set out in this policy.

Our Toll Way

Toll believes that business is not measured purely in financial terms. We also believe that **how we go about achieving our success is as important as success itself**. This is the principle behind the commitment we make to give back to the communities in which we work.

We make decisions about giving back with the same integrity we apply to everything we do at Toll and we have developed appropriate policies and principles to guide us. By applying these guidelines, we can be sure all Toll's sponsorships, donations and social investments are made in keeping with our values of **Integrity and Trust** and doing the right thing the right way.

What if...

You are trying to win an important account for Toll, and you know we've made the shortlist. Your client's managing director is a prominent supporter of a local nature charity and you've heard that he looks kindly on companies that support the charity. It sounds like a good investment.

What would you do?

This scenario poses an immediate problem because it crosses into the area of bribery and corruption. Never be tempted to make a charitable donation on behalf of Toll for the purpose of achieving a business advantage of any kind. Use the Toll Group Sponsorships, Donations and Social Investments Policy and supporting guidelines to carefully consider any request and document your assessment of the recipient's integrity and reasons for the decision if you are considering offering any donation or sponsorship on behalf of Toll. Any donation or sponsorship must also be duly documented, registered and approved according to the approval process and authority matrix set in the Toll Group Sponsorships, Donations and Social Investments Policy.

More Information

Policies: [Toll Group Sponsorships, Political Donations and Social Investments Policy](#)

Advice: Your line manager, General Manager, Country Manager, Group Corporate Affairs, Group Compliance

A night cityscape with light trails and a central light pole. The background is a dark blue night sky with a city skyline. A single light pole stands in the center, with its light shining down. The city lights are blurred into streaks of light, creating a sense of motion and connectivity. The overall tone is futuristic and digital.

Communications

Communication is essential within and between every part of an organisation, as well as with our many stakeholders, including our people, customers, and communities.

To ensure Toll meets its many responsibilities to these stakeholders, we act ethically, lawfully, with integrity and maintain the highest professional standards in all of our communication with them.

Communicating outside of Toll	74
Social Media	77



Communicating outside of Toll

It is important to manage our reputation with the media and in other public forums to ensure we are fairly represented in news stories and influence how we are perceived by the general public.

Toll is responsible to its many stakeholders worldwide, including our employees, governments and the communities in which we operate. To ensure we uphold these responsibilities, Toll's public statements on any issue are only ever made by approved company spokespeople.

If you are approached by anyone to make a comment on behalf of Toll, politely decline to comment and refer the media outlet or journalist to Toll Media (part of Group Corporate Affairs) at media@tollgroup.com. This applies to all outlets, including trade magazines, local and national radio, TV and newspapers.

Group Corporate Affairs will consider who is best placed to address the query.

Always

- ✔ Refer all approaches or requests by media outlets in relation to Toll to the Group Corporate Affairs team
- ✔ Ensure your use of any form of social media on any device – within and outside of work hours - is conducted in accordance with the Toll Group Social Media Policy and that it is consistent with the Toll Group IT Acceptable Use Policy. Refer to the separate section within this document regarding Social Media use
- ✔ Seek approval for external communications, including public speaking engagements, as required by the Toll Group Media and External Communication Policy



Never

- ✘ Speak on behalf of Toll to a member of the media, government, financial community or use social media or any other public outlet to do so unless you are authorised by Group Corporate Affairs
- ✘ Speak on behalf of Toll using any social media platform unless approved by Group Corporate Affairs. Your views are your own and you must explicitly say so if you ever comment about Toll in a social media environment



Supporting you

The ultimate parent company of Toll, Japan Post Holdings Co. Ltd, is listed on the Tokyo Stock Exchange. There can be serious legal consequences for listed organisations who do not meet, or employees who interfere with, the requirements set by governments and authorities for the release of company information.

In order to help protect our people and safeguard the reputations of Japan Post Holdings Co. Ltd and the Toll Group, Group Corporate Affairs is responsible for managing comments or endorsements on behalf of Toll for use by media, industry, third parties (e.g., suppliers), or on social media. You also need approval from Group Corporate Affairs to speak publicly in relation to Toll at external forums, conferences, panels or events.

If you are unsure, speak with your line manager or a representative from Group Corporate Affairs

Our Toll Way

Toll acts ethically and within the law always and we are committed to meeting our many responsibilities to our stakeholders.

This is also in keeping with our core values of **Integrity and Trust** and **being Open and Transparent**.

What if...

You pick up a call on your mobile phone from a person who says they're from a local radio station. They ask for a colleague and you let them know they have the wrong person. They say it doesn't matter as they just want a very quick response to a rumour they have heard in relation to Toll. You let them know that's not something you are authorised to comment on, but they are persistent, and they tell you it is only an 'off the record' comment they want i.e., it won't be broadcast. You know a bit about the topic and the caller is not taking no for an answer.

What would you do?

To give into this pressure to speak on Toll's behalf would lead to disciplinary action. Never speak on a Toll matter or represent Toll's views to a member of the media, government, or financial community unless you are authorised by Group Corporate Affairs to do so. No matter what the circumstances or how insistent a person may be, you should decline and direct them to Group Corporate Affairs.

More Information

Policies: [Toll Group Media and External Communication Policy](#),
[Toll Group Social Media Policy](#)

Advice: Your line manager or Group Corporate Affairs



Social Media

We act ethically, lawfully, with integrity and maintain the highest professional standards when participating in social media at Toll.

Everyone at Toll, including employees, contractors, agents and associates are personally responsible for the content we publish in any form of social media. In the best interest of Toll and our many stakeholders, you should never speak on behalf of Toll, or imply you represent Toll's views, including making comments or expressing opinions in Toll uniform or at a Toll site unless you are authorised to do so by Group Corporate Affairs.

Whether you are within or outside of work hours, your use of social media needs to comply with Toll's Social Media Policy, particularly with regard to any comments about Toll, its management, employees, customers, agents, suppliers or any other stakeholders.

Any breach of the Toll Group Social Media Policy may lead to disciplinary action, including termination of employment.

Always

- ✔ Follow the guidelines set by Toll for acceptable use of social media while you are on the job or in a Toll workplace
- ✔ Use your best judgment when considering commenting on any issue or representing your views via social media
- ✔ Ensure any information you post about Toll, its employees, contractors, customers, suppliers and/or business partners on social media is:
 - Polite and respectful
 - Accurate and informed
 - Not confidential information, only comment on publicly available information
 - Compliant with all of Toll's policies and codes. In particular, you should read and know the details of the Toll Group Social Media Policy and this Code
 - Not obscene, defamatory, discriminatory, harassing, sexually explicit, bullying, hateful, racist, sexist or is otherwise unlawful
 - Value-adding, for example, improves knowledge, skills, networks and a sense of community

Ask your line manager or refer to the Toll Group Social Media Policy if you are ever unsure about acceptable use of social media at work or as someone associated with Toll.

Contain your use of social media platforms for personal use while at work to a reasonable level that does not exceed your personal break times or interfere with the responsibilities of your role.

Report any negative or inappropriate posts about Toll, its brands or its customers, employees, managers, contractors, agents or suppliers to Group Corporate Affairs.

Never

- ✘ Misuse social media whether at work or outside of work or allow it to interfere with your Toll work requirements and responsibilities
- ✘ Speak on behalf of, or imply you represent the views of Toll, in any form of social media
- ✘ Ignore an inappropriate post about Toll. Bring it to the attention of management or your HR representative who will take the issue up with the person responsible for the post

Supporting you

Social media is a dynamic, changing environment and individuals and organisations are continually learning about its many positives, as well as its potential dangers if misused.

To assist us all to make best use of social media and avoid its pitfalls, Toll provides clear guidance for people employed or engaged by Toll on the use of social media.

Line managers are responsible for ensuring their team members are familiar with both the Toll Group Social Media Policy and the Toll Group IT Acceptable Use Policy.

If you are unsure, speak with your line manager or a representative from Group Corporate Affairs

Our Toll Way

At Toll **we act ethically, within the law and with respect in everything we do**, including participation in any form of social media.

We have a strict policy on the use of social media to protect Toll's image, reputation, and confidential information. This is **part of our commitment to meet our responsibilities to our many stakeholders**.

Our guidelines for use of social media by Toll people underline our values of **Integrity and Trust**.

What if...

Personally, you are not happy with a particular business decision recently announced by Toll and you are pretty sure there would be community support for your views. You have used social media to get debate going before, outside of work, and you have an anonymous persona, so no one has to know it was you.

What would you do?

Use your best judgment when considering commenting on any issue or representing your views via social media. Be sure you are familiar with the relevant policies and guidelines before making any decision to discuss Toll on any social media platform. Using an anonymous persona in this instance would be misleading, dishonest and unethical. Toll values the views and opinions of its people and there are proper channels to raise any grievances or issues you may have about Toll or a Toll business decision.

More Information

Policies: [Toll Group Social Media Policy](#), [Toll Group IT Acceptable Use Policy](#)

Advice: Your line manager, Business Unit or Divisional HR representative, or Group Corporate Affairs



Got a question?

Sometimes you may need to clarify an area of the Code with the appropriate Divisional or Group level subject matter expert. Set out below are their contacts, as well as details on how to access the Toll Disclosure Hotline.

GROUP COMPLIANCE

compliance@tollgroup.com

GROUP CORPORATE AFFAIRS

gca@tollgroup.com

media@tollgroup.com

GROUP LEGAL – PRIVACY

privacy@tollgroup.com

TOLL GROUP DISCLOSURE HOTLINE

Make a report online (available in multiple languages from any location) and/or see the complete list of country telephone numbers at:

www.tollgroup.ethicspoint.com

See next page for list of phone numbers.

TOLL GROUP DISCLOSURE HOTLINE

Australia	1800 623 925
China	4008 800 742
Denmark	8083 0071
Finland	0800 413 612
France	0800 99 0011, and then dial 855 831 9876
Germany	0800 189 9361
Hong Kong	800 960 304
India	000 117, and then dial 855 831 9876
Indonesia	001 801 10, and then dial 855 831 9876
Ireland	00 800 222 55288, and then dial 855 831 9876
Italy	0800 194 753
Japan	00531 11 0347
Malaysia	1800 80 0011, and then dial 855 831 9876
Netherlands	0800 022 9459
New Zealand	000 911, and then dial 855 831 9876
Singapore	800 110 2120
South Africa	0800 99 0123, and then dial 855 831 9876
South Korea	00 309 11, and then dial 855 831 9876
Sri Lanka	112 430 430, and then dial 855 831 9876
Sweden	020 1090389
Taiwan	00 801 102 880, and then dial 855 831 9876
Thailand	1 800 0001 33, and then dial 855 831 9876
UAE	8000 021, and then dial 855 831 9876
UK	0800 086 9858
US	855 831 9876
Vietnam	1 201 0288, and then dial 855 831 9876



For more information contact:

Group Compliance

TOLL