
Code of Conduct

Document Number:	BG-COR-GUI-0012
Department:	COR - Corporate
Approver:	Stephen Easterbrook (BG)
Revision:	0
Review Timing:	36 Months
Last Reviewed:	22/07/2025



OUR CODE

Our Code of Conduct brings Our Values to life and helps us make better decisions every day. It applies to everyone who works with us, or on our behalf.

This Code of Conduct (the **Code**) establishes the behavioural standards expected across Bright Group (including all related entities). It provides a framework for how we approach our work, make decisions, and assess our conduct. It serves as both a guide and a benchmark for accountability.

The Code is central to everything we do and must be consistently upheld. At times, we may face challenging decisions. By adhering to the Code, you can be confident that you are making sound choices and contributing to a workplace and organisation we can all be proud of.

The Code applies to all employees, contractors, consultants, and others working with us under a contractual agreement. For simplicity, this document refers to all such individuals as "Employees."

While the Code does not detail every legal or regulatory requirement, it sets the minimum standard for expected behaviour. If you are ever unsure about a situation, seek guidance. The Code is not a substitute for good judgment—it is a tool to support and enhance it. Every Employee is responsible for acting with integrity, exercising sound judgment, and complying with the law.

All Employees are supported in upholding the Code. Any form of retaliation against individuals who do so will not be tolerated. Breaches should be reported immediately.

Take the time to familiarise yourself with the Code and consult it when needed. By following it, we reinforce our values and help drive our collective success.

OUR VALUES

At Bright Group, our Code of Conduct is a practical reflection of our core values in action. It sets the standard for how we work, how we treat one another, and how we deliver for our clients and communities.

Each principle within this Code supports our commitment to **Respect, Integrity, Safety** and **Excellence**.



RESPONSIBILITIES OF LEADERS

At Bright Group, our leaders play a critical role in shaping the culture, safety, and performance of our business. They set the standard through their actions and decisions, and are expected to lead with integrity, accountability and respect in everything they do.

Our Leaders:

- **Role Model Right Behaviours:** Lead by example through our Values and Code. Set the tone for ethics, care, and inclusion.
- **Ensure Understanding & Compliance:** Help teams understand and apply our Code, Requirements, laws, and standards. Support safe, ethical work.
- **Listen & Act:** Promote a speak-up culture. Listen, respond fairly, and act without retaliation.
- **Own Accountability:** Take responsibility for decisions, team wellbeing, and risk management. Escalate concerns and act promptly.

MAKING GOOD DECISIONS

By working at Bright Group, you commit to respecting and adhering to the Code, as well as to the policies, standards, and procedures relevant to your role.

If you are unsure about the meaning of the Code or are concerned about a potential or actual breach, raise the issue promptly. Choosing to ignore a problem is never acceptable. Acting with integrity means addressing issues, not avoiding them.

QUICK TEST

The Quick Test is a tool to help you evaluate different aspects that contribute to making a good decision.

We use our **Quick Test** to make safe, responsible, and ethical decisions we can stand behind. All of our decisions should be guided by Our Values. You should consider:

Safety: Could this directly or indirectly endanger someone?	Media: How would this look in the news?	Law: Is this compliant with Our Code, Our Requirements, and applicable laws and regulations?
Family: What would I tell my partner, parent, child or friend to do?	Feel: What's my intuition or 'gut feel'? How would I feel if this was seen, overheard or shared with a colleague, leader or stranger?	✓ If you're unsure—stop and speak up.

Raising a Concern or Reporting Misconduct

If you witness or suspect improper conduct, your first step should be to report it to your manager. If this isn't appropriate—such as when the Manager is involved or the response is unsatisfactory—you may report the concern through:

- A HSE representative (for health, safety, and environmental matters),
- A Human Resources representative (for issues like bullying, discrimination, or harassment),
- The independent Whistleblower service.

It is expected that all employees report any known or suspected misconduct.



COMPLYING WITH THE CODE

The Code forms part of your terms and conditions of working for, or with, Bright Group. This means you must:

- Understand and behave in line with the Code
- Speak up about the behaviour of others which goes against the Code or Bright Group policies
- Co-operate as directed by Bright Group with any investigation, inquiry, examination or litigation related to Bright Group business.

Breaching the Code can lead to serious consequences. Depending on the nature of the breach, outcomes may include verbal counselling, warnings, or even termination of employment. In some cases, a breach may also constitute a violation of the law, potentially resulting in civil or criminal consequences.

You must follow the law, act with integrity and honesty in all matters, and be accountable for your actions.

You must be familiar with and comply not only with the Code, but with all supporting Bright Group policies and standards relevant to your particular area of work. You must also comply with all applicable laws, standards or policies. However, where the Code sets a higher standard – then you must follow the Code.

OUR NON-NEGOTIABLES

At Bright Group, our **Non-Negotiables** reflect the minimum expectations for behaviour, performance, and accountability across all work environments. They are critical to the safety, productivity, and professionalism of our workforce. These standards apply to everyone—without exception—and must be demonstrated every day, on every task.

We uphold these Non-Negotiables to protect each other, deliver quality outcomes for our clients, and maintain the trust of the communities we work in.

These non-negotiables are not optional—they are essential. Consistent adherence supports a strong culture of integrity, safety, and performance across Bright Group.



PRESENT FIT FOR WORK.



WEAR CORRECT PPE.



ON TIME, READY TO CONTRIBUTE.



WORK PACKS ARE FOLLOWED.



EQUIPMENT IS MAINTAINED.



RESPECT FOR ALL.



1 UPHOLDING RESPECT

1.1 Respect for All

Everyone deserves to be treated with dignity and respect. Harassment, bullying, discrimination, and other disrespectful behaviours are unacceptable and can cause real harm.

Bright Group is committed to a workplace free from these behaviours. We have a zero-tolerance approach to harassment, bullying, and discrimination. These actions are unlawful and may result in significant personal and organisational consequences.

Respect is a shared responsibility, and everyone has a role in building an inclusive, safe, and fair workplace.

We ALWAYS:

- Act professionally and respectfully toward everyone.
- Follow lawful and reasonable directions.
- Comply with all laws, standards, and client/community expectations.
- Treat harassment and discrimination as safety risks.
- Speak up against disrespectful behaviour.
- Call out inappropriate or exclusionary actions—intentional or not.
- Support others to speak up and seek help.

We NEVER:

- Engage in or tolerate harassment, bullying, racism, or discrimination.
- Act in offensive, humiliating, or degrading ways.
- Share or display explicit, sexist, racist, or otherwise inappropriate content—online or offline.
- Take part in or accept inappropriate hospitality, entertainment, or gifts.
- Make unwanted romantic advances toward colleagues.
- Enter relationships with trainees, interns, or apprentices if in a position of authority.
- Treat someone differently for union involvement or lack of it.
- Discriminate based on irrelevant personal characteristics.

Examples

Situation	Our Response
Observing colleagues passing around explicit images.	This is unacceptable and may constitute harassment. You must speak up and report the behaviour.
Witnessing a manager berate a colleague publicly.	Such behaviour is unprofessional and contrary to our values. Raise the issue so it can be addressed appropriately. All feedback must be constructive and respectful.



1.2 Equal Opportunity & Fair Treatment

We are committed to providing equal opportunities in every aspect of employment. Recruitment, promotion, and all other work-related decisions must be based solely on genuine merit, skills, and suitability for the role—never on personal bias or prejudice.

Everyone deserves, and is entitled to, equal treatment and respect in the workplace. As a reflection of the diversity in society, we actively support and value a diverse and inclusive workplace where all individuals can thrive.

We ALWAYS:

- Recruit and promote based on skills, experience, and alignment with the role.
- Make training and development opportunities accessible to all Employees.
- Consider and respect cultural factors that may influence workplace experiences.

We NEVER:

- Make employment decisions based on attributes unrelated to job performance (e.g., race, gender, disability, religion, nationality, age, sexual orientation, or family responsibilities).
- Tolerate discrimination in any form.

Examples

Situation	Our Response
Promoting or hiring someone based on a personal relationship (e.g., a friend or family member).	This violates the Code. All decisions must be based on merit, relevant skills, and demonstrated performance.
Telling racial jokes or making discriminatory slurs.	This behaviour is unacceptable and will result in disciplinary action. Discrimination in any form is not tolerated.



Behaviours that aren't accepted at Bright Group.

There are some behaviours that undermine Our Values and that have no place at Bright Group. Some examples include sexual harassment, bullying, racial harassment, or discrimination. We are all responsible for ensuring none of our people are exposed to these behaviours, and that we speak up if we observe them.

Our leaders are accountable for lifting the performance of their teams through regular coaching and feedback, which is not harassment or bullying if it is respectful and constructive.

Sexual harassment

Sexual harassment is an unwelcome sexual advance, unwelcome request for sexual favours, or other unwelcome conduct of a sexual nature, which makes a person feel offended, humiliated, and/or intimidated, where a reasonable person

would anticipate that reaction in the circumstances. Sexual harassment includes displaying or sharing offensive material.

Racial harassment

Racial harassment is a racial slur, derogatory joke, comment, image or unwanted conduct based on race, descent, ancestry, ethnicity, ethnic origin, nationality, national origin, country of origin, colour or status as an immigrant. Racial harassment also includes displaying or sharing offensive material.

Discrimination

Discrimination occurs when a person, or group of people, is treated less favourably than another person or group, because of a personal attribute. A personal attribute can include gender identity, sex, age, origin, ethnicity, race, sexual orientation, intersex status,

gender reassignment, transgender status, disability, marital and civil partnership status, religion, political opinion, pregnancy, breastfeeding, family responsibilities or experience of family and domestic violence.

Harassment

Harassment includes unwelcome behaviour that offends, humiliates or intimidates a person. Generally harassment occurs because of a personal attribute (as described above).

Bullying

Bullying is repeated behaviour directed towards a worker or group of workers that a reasonable person, having considered the circumstances, may see as unreasonable, including victimising, mocking, humiliating, intimidating or threatening behaviour, displaying or sharing offensive material.



2 ACTING WITH INTEGRITY

2.1 Bribery & Corruption

At Bright Group, we conduct all business with honesty, transparency, and integrity. We have zero tolerance for any form of fraud, bribery, or corruption—whether direct or indirect, public or private, domestic or international.

Bright Group strictly prohibits corrupt or unethical conduct by Employees or any third party acting on our behalf. Our reputation depends on doing the right thing, every time.

We ALWAYS:

- Report suspected fraud, bribery, or corruption immediately.
- Know who we're doing business with, including ownership and roles.
- Get approval before offering gifts, hospitality, or contributions.
- Provide accurate information when seeking approvals.
- Record transactions truthfully and clearly.

We NEVER:

- Offer anything of value to influence officials or gain unfair advantage.
- Award contracts in exchange for personal or business benefits.
- Join or approve deals that give improper advantages.
- Hide transactions, falsify records, or use secret accounts.
- Split payments or bypass approvals.
- Use partners we suspect of corrupt behaviour.
- Work with parties who conceal their identity or ownership.

2.2 Fraud & Theft

Bright Group has a zero-tolerance approach to fraud and theft. You are expected to comply with the following:

- Bright Group assets or other resources may not be used for personal benefit - you are responsible for safeguarding Bright Group assets and resources under your control
- Report instances or suspicions of fraud and theft immediately after you become aware, regardless of whether the instance relates to an employee, a contractor or any other party
- Funds must be used wisely and frugally. You should consider whether expenditure you are required to authorise is appropriate in the circumstances. All expenditures must be correctly allocated and reported on a timely basis

Fraud: Fraud is dishonest activity causing actual or potential financial loss to any person or organisation. The following actions are prohibited and regarded as fraud:

- Theft of money or other property
- Deliberate use of false documents or covering up or destroying documents, for, or intended for, business use



- Improper use of information or position for personal financial benefit
- Misuse of Bright Group's assets, including its intellectual property.

Theft: You must take appropriate precautionary action to prevent theft, damage or misuse of Bright Group resources. The following actions are prohibited and regarded as theft:

- Unauthorised removal of Bright Group equipment, supplies, or other resources
- Selling, lending or donating Bright Group resources without appropriate approval
- Intentionally damaging, destroying or disposing of Bright Group property (excluding items of nominal value which can no longer be used) without appropriate approval
- Submission of a fraudulent expense reimbursement claim and use of corporate credit cards for personal use.

This is regarded as serious misconduct for which disciplinary action will be taken.

2.3 Fair Competition

At Bright Group, we believe in competing fairly and ethically. We are committed to complying with all applicable Competition Laws, which are designed to prevent behaviours that restrict, distort or reduce fair market competition.

Anti-competitive conduct—such as price-fixing, market sharing, or abusing a dominant market position—undermines trust in the market and exposes both the company and individuals to significant risk.

Breaching Competition Law can result in severe consequences, including large financial penalties, civil claims from clients or competitors, damage to our reputation, and in some cases, criminal charges for individuals involved.

We all have a responsibility to recognise and avoid behaviour that could be seen as anti-competitive, and to seek guidance whenever in doubt.

We ALWAYS:

- Ensure all communication—emails, messages, and even voicemails—is professional and accurate, assuming it could be reviewed by regulators.
- Seek legal or compliance guidance before:
- Collaborating with a competitor on a joint bid.
- Participating in industry groups or associations.
- Attending meetings with competitors.
- Sharing information under a non-disclosure agreement (NDA).

We NEVER:

- Engage in price fixing, bid rigging, or divide markets or customers with competitors—verbally or in writing.
- Enter into informal “understandings” or side conversations that reduce competition.
- Use our market position to unfairly exclude competitors or pressure customers to switch suppliers.
- Share confidential information about one client with another—even if it doesn't seem sensitive.



2.4 Corporate Social Responsibility & Australian Industry Participation

At Bright Group, we are committed to conducting our business in a socially responsible, sustainable, and inclusive way. We recognise our responsibility to contribute positively to the communities in which we operate and to support economic and social development in Australia.

This includes fostering inclusive employment practices, supporting local and First Nations Australian businesses, protecting cultural and environmental heritage, and ensuring accountability in all stakeholder relationships. Our goal is to deliver value not just through our work, but through our long-term impact.

We ALWAYS:

- Act responsibly and respectfully, meeting community expectations.
- Support employees with benefits, family-friendly policies, and EAPs.
- Partner respectfully with First Nations communities.
- Prioritise local and Australian-owned businesses where possible.
- Deliver quality work that meets or exceeds standards.
- Consult communities to reduce social, cultural, and environmental impacts.
- Offer training and development for employees and contractors.
- Stay transparent and accountable with all stakeholders.

We NEVER:

- Disregard the cultural or environmental impact of our operations.
- Prioritise cost over compliance with legislation, community expectations, or quality standards.
- Misrepresent our contribution to Australian industry or our community engagement efforts.



2.5 Trade Sanctions & Export Control Policy

At Bright Group, we operate in a global environment and may engage in activities involving the purchase, manufacture, or provision of services outside Australia. As part of our commitment to conducting business lawfully and ethically, we comply with all applicable trade sanctions and export control regulations in every country where we operate.

Sanctions are implemented to uphold international security and foreign policy objectives. Bright Group fully supports and complies with lawful trade sanctions imposed by the Australian Government, which may include:

- Financial sanctions such as asset freezes on designated individuals or entities
- Travel bans
- Restrictions on trade in specific goods or services
- Limits on commercial dealings with sanctioned persons or entities
- Bans on certain vessels entering Australian waters

We ALWAYS:

- Comply with Australian and international trade sanctions and export control laws
- Screen all third parties and suppliers against relevant sanctions lists
- Confirm the legal classification of goods, services, and technology before cross-border transfers
- Maintain accurate customs documentation for all international movements
- Report any suspicious activities or red flags to the Leadership Team immediately
- Seek legal advice or leadership guidance when working across international borders

We NEVER:

- Engage with individuals, entities, countries, or vessels listed under applicable trade sanctions
- Proceed with cross-border transfers without confirming local laws and obtaining necessary approvals
- Ignore or bypass red flags in business dealings or due diligence
- Facilitate or disguise transactions that would breach sanctions or export laws

Examples

Situation	Our Response
A supplier from a foreign country offers to ship equipment to Bright Group at a significantly reduced price, but their company appears on a government watchlist.	We halt all dealings with the supplier, conduct immediate due diligence, and consult with legal and leadership teams. We report the issue and confirm the supplier is listed on a sanctions register. We terminate discussions and document our compliance actions.



2.6 Conflict of Interest

At Bright Group, every decision we make must be in the best interests of the company—free from personal bias, undue influence, or competing loyalties. A conflict of interest arises when personal, financial, or relational interests compromise, or appear to compromise, your ability to act objectively and in Bright Group’s best interest.

Conflicts can be actual, potential, or perceived, and they must always be disclosed and managed transparently.

Conflicts may include:

- Awarding or influencing business decisions that benefit yourself, close friends, or family
- Accepting gifts, hospitality, or benefits from suppliers or third parties
- Being in a romantic or familial relationship with someone within your reporting line

We ALWAYS:

- Remove ourselves from any decision where our objectivity could be compromised
- Disclose actual, potential, or perceived conflicts to our Line Manager as soon as we become aware of them
- Seek guidance if we are unsure whether a situation could be viewed as a conflict

We NEVER:

- Hire, promote, or supervise close relatives or friends without prior written authorisation
- Award contracts or engage businesses owned by people we are personally or financially connected to
- Use our role or Bright Group resources to support external interests or gain personal benefit
- Interfere with fair, competitive procurement, tendering, or recruitment processes
- Accept gifts, entertainment, or favours from parties we may work with unless properly declared and approved

Examples

Situation	Our Response
A team leader is asked to review supplier proposals and notices that one submission is from a business owned by their brother-in-law.	The team leader immediately discloses the relationship to their manager and removes themselves from the evaluation process. An independent reviewer is appointed to ensure the procurement process remains fair and unbiased.
An employee begins dating a colleague who is also their direct report. They continue working together without notifying anyone.	Once the relationship is discovered, the reporting line is restructured to remove the conflict. Both employees are reminded of the importance of transparency in managing personal relationships in the workplace and the requirement to disclose such conflicts early.



2.7 Communicating Consistently & Truthfully

At Bright Group, we are committed to open, accurate, and consistent communication. Whether we're engaging with the public, media, clients, regulators, or the broader community, how we communicate reflects directly on our reputation and compliance obligations. All public disclosures must be carefully managed and can only be made by authorised spokespeople.

Public communication includes—but is not limited to:

- Media interviews, presentations, speeches, and external publications
- Website content, social media posts, and messaging on public or private channels

We ALWAYS:

- Follow the approved communication protocols for public statements on behalf of Bright Group
- Obtain the appropriate internal approvals before publishing or sharing external content
- Ensure social media activity aligns with our values and only shares information already in the public domain
- Report any material information that could influence investment decisions to the appropriate internal contact

We NEVER:

- Make public statements or disclose information unless authorised to do so
- Share confidential or sensitive company information outside of approved channels
- Omit key facts or misrepresent the truth in any communications
- Use Bright Group logos, trademarks, or branding without prior approval
- Post or share content that is offensive, discriminatory, defamatory, or harmful to individuals or groups

Examples

Situation	Our Response
A Bright Group employee is invited to speak at an client forum and plans to present company updates.	The employee seeks prior approval from the Managing Director and ensures the content is reviewed to avoid sharing non-public or commercially sensitive information. The presentation is then delivered in line with company communication standards.
A team member shares a behind-the-scenes photo of a restricted area on their personal social media account with a caption describing ongoing work.	The post is flagged and removed, and the employee receives a reminder of our Social Media Policy. All employees are reminded that posting site details—even informally—can unintentionally disclose confidential information and breach our communication guidelines.



3 SAFETY AT WORK

3.1 Work Health & Safety

Bright Group is committed to a safe, healthy, and environmentally responsible workplace.

We prioritise the wellbeing of our people and those affected by our operations, aiming for zero harm and full legal compliance—while striving for industry best practice.

Our HSE performance is guided by clear policies and procedures that apply to everyone. Leaders ensure consistent implementation and support systems, while performance is regularly monitored and reported. Every employee shares responsibility for maintaining a strong safety and environmental culture.

We ALWAYS:

- Follow all HSE procedures and help others do the same.
- Identify, assess, and manage HSE risks in our work.
- Stop any task that seems unsafe or poses a risk.
- Wear the correct PPE for the job.
- Handle and dispose of materials safely and legally.
- Report hazards and incidents—don't assume others will.
- Pay attention to and act on HSE alerts.

We NEVER:

- Work unless trained, competent, fit, and free from drugs or alcohol.
- Perform tasks without PPE or in unsafe conditions.
- Use or be under the influence of drugs or alcohol at work.
- Take medication that affects safety without declaring it if required.
- Possess illegal drugs or firearms on Bright Group sites.

3.2 Fitness for Work

All team members are responsible for looking after their colleagues and themselves, and for making sure they don't put the health and safety of others at risk.

It is important to come to work free of illness, fatigue, alcohol and/or performance impairing drugs, and any other cause of impairment which could affect your ability to work safely or cause harm to others. You also have a duty to ensure your personal behaviour within the workplace and elsewhere does not adversely affect:

- Your work
- Your safety or the safety of your co-workers
- Your reputation or the reputation of your co-workers
- Bright Group in any way.

This duty extends to any situation where your conduct could be connected to your work with Bright Group, including on social media.



3.3 Drug & Alcohol Use

We are committed to maintaining a workplace free from the risks associated with drug or alcohol misuse. Safety, health, and clear decision-making are compromised when employees are under the influence of substances.

Alcohol is not permitted at worksites, including offices and operational sites, unless explicitly allowed at designated areas or approved events. Employees consuming alcohol during work hours must not return to work for that shift.

Smoking, including vaping, is prohibited in all Bright Group buildings. Designated smoking areas, where provided, must be clearly marked, well-ventilated, and isolated from workspaces to minimise exposure to passive smoking.

We ALWAYS:

- Arrive at work fit, alert, and ready to safely perform your duties.
- Act early if you or someone you supervise shows signs of dependency.
- Address concerns about substance use discreetly and report them to your supervisor, manager, or HR.
- Disclose prescribed medications or treatments that may affect your ability to safely perform safety-sensitive tasks.
- Comply with all drug and alcohol testing requirements.

We NEVER:

- Work (including commute or attend work events) while under the influence of any substance—legal, illegal, or prescribed—that impairs your ability to perform safely.
- Consume, provide, or allow alcohol at worksites in breach of policy.
- Possess, use, or share illegal drugs or substances at any Bright Group workplace or function.
- Ignore or conceal substance abuse when you witness it.

3.4 Personal Protective Equipment

At Bright Group, the correct and consistent use of Personal Protective Equipment (**PPE**) is fundamental to maintaining a safe and healthy workplace. PPE acts as a critical control in minimising risk and preventing harm in our operational environments. All employees are expected to wear the required PPE at all times and to set the standard for safety in their work areas.

PPE requirements are determined based on the nature of the task, environment, and associated risks, and must be worn in accordance with Bright Group policies, site procedures, and any client-specific requirements. Supervisors and managers are responsible for ensuring PPE compliance and for supporting employees to understand and meet these obligations.

We ALWAYS:

- Wear the appropriate PPE for the work being performed, as identified in risk assessments, procedures, and signage.
- Inspect PPE before use to ensure it is fit for purpose and in good working condition.



- Maintain, clean, and store PPE correctly to prolong its effectiveness.
- Replace damaged, worn, or expired PPE immediately.
- Report any PPE deficiencies, issues, or hazards to your supervisor.
- Ensure that visitors are provided with and correctly use the required PPE.

We NEVER:

- Undertake work without the required PPE, even for a short duration.
- Tamper with, misuse, or modify PPE in a way that compromises its effectiveness.
- Use damaged, defective, or inappropriate PPE.
- Assume a task doesn't require PPE without first verifying the risk and safety controls.

Proper PPE use is a shared responsibility and an essential part of our commitment to zero harm. By following PPE protocols, we protect not only ourselves but also our team and the communities in which we operate.

3.5 Environment & Sustainability

Bright Group is committed to conducting its operations in a manner that protects the environment, conserves natural resources, and supports long-term sustainability. We understand our responsibility to minimise the environmental impact of our work and to contribute positively to the communities and ecosystems in which we operate.

All employees are expected to act with environmental awareness and accountability—both in day-to-day tasks and long-term planning. We comply with all environmental laws, standards, and site-specific requirements and actively seek opportunities to improve our environmental performance.

We ALWAYS:

- Follow environmental procedures and site-specific requirements to prevent pollution and minimise impact.
- Use resources—such as water, energy, and materials—efficiently and responsibly.
- Manage waste through reduction, segregation, recycling, and correct disposal methods.
- Immediately report environmental hazards, spills, or non-compliance to supervisors.
- Respect and protect culturally significant sites and natural habitats.
- Participate in environmental training and initiatives that support sustainability goals.

We NEVER:

- Disregard environmental controls or procedures.
- Improperly dispose of chemicals, waste, or materials that may harm the environment.
- Damage protected flora, fauna, or culturally sensitive areas.
- Ignore environmental incidents or fail to report them.



4 DELIVERING EXCELLENCE

4.1 Protecting Our Assets

At Bright Group, we all have a responsibility to protect and respect company assets—whether physical, digital, or intangible. Assets must be used appropriately, lawfully, and only for their intended business purpose. This includes everything from equipment and PPE to sensitive data, company information, intellectual property, and our reputation.

Our people are our most valuable asset. We also place strong importance on maintaining the security and integrity of other key assets, including vehicles, IT systems, plant and equipment, and confidential business strategies.

We ALWAYS:

- Use Bright Group assets responsibly and only for legitimate business purposes
- Take reasonable steps to prevent damage, loss, misuse or theft of assets
- Report any concerns or suspicious activity that could compromise Bright Group property
- Ensure assets under our control are maintained according to manufacturer guidelines and industry best practices
- Confirm that third parties using our assets comply with relevant policies and legal requirements

We NEVER:

- Use company assets for personal benefit or unauthorised purposes
- Provide access to company assets or resources to non-authorised persons
- Use Bright Group equipment or systems to view or share inappropriate or offensive content
- Tamper with or intentionally damage any company asset

Examples

Situation	Our Response
An employee takes home a company tablet to use for a personal reason over the weekend without authorisation.	The misuse is identified during an audit. The employee is reminded of our policy on personal use of company assets, and the device is returned. A warning is issued, and refresher training is provided to the team on appropriate asset usage.
A team member notices unsecured equipment being used by an external contractor who is not wearing the correct PPE or following safety guidelines.	The employee immediately reports the situation to their supervisor. The contractor is removed from the site until they comply with safety requirements. Bright Group reinforces to all contractors the obligation to follow our asset use and safety policies.



4.2 Safeguard our technology, systems and data

At Bright Group, all employees have a responsibility to protect our technology, systems and data. Inappropriate use or negligence can expose the company to cyber threats, financial loss, reputational damage, and legal consequences.

Our systems must be used securely, lawfully, and only for business purposes. This includes preventing unauthorised access, keeping sensitive information confidential, and avoiding risky online behaviour. Bright Group technology must never be used to spread false information, commit cybercrime, or store data outside of approved platforms.

We ALWAYS:

- Use only authorised platforms and apps for Bright Group business activities
- Protect hardware, software and data from loss, theft, or unauthorised access
- Lock screens when away from your workstation and secure devices in public places
- Report suspected phishing emails, system intrusions, or inappropriate data use immediately
- Treat emails, chats and digital messages as formal business communications
- Return all Bright Group equipment and data at the end of your employment or contract

We NEVER:

- Share login credentials, passwords, or allow others to use your account
- Install unauthorised software or connect unapproved devices to company equipment
- Use Bright Group systems to store, send, or share inappropriate, offensive, or misleading material
- Post, store or share company data on personal devices, email accounts, or cloud services
- Use Bright Group systems for personal gain or access systems without business justification
- Fail to report suspicious behaviour, data breaches, or cyber risks when identified

Examples

Situation	Our Response
An employee downloads and installs free software from the internet onto their work laptop to help with a personal task.	IT detects the unauthorised installation during routine monitoring and removes the software. The employee is reminded of the policy and given a warning. All staff receive a reminder about the risks of downloading non-approved software.
A worker receives an email claiming to be from a Bright Group supplier asking for urgent payment with a new bank account.	The employee suspects phishing and reports the email to Technology immediately. The fraudulent email is blocked, and a company-wide alert is sent to raise awareness. No funds are lost, and the employee is recognised for doing the right thing.



4.3 Use of Personal Information

At Bright Group, we respect the privacy of individuals and are committed to protecting personal information. We handle all personal data—whether it belongs to employees, contractors, clients, or candidates—in line with privacy laws and Bright Group policies.

Personal information includes any information or opinion about an identified or reasonably identifiable person. This may include names, addresses, health and safety records, employment history, job applications, and internal correspondence. We must use, store, and share this information only when necessary and always in a secure, lawful, and respectful manner.

We ALWAYS:

- Collect only the personal data required for a legitimate business need
- Clearly explain why we are collecting personal data and how it will be used
- Safeguard personal information by storing it securely and limiting access
- Promptly report any suspected or confirmed data breaches or privacy issues
- Follow all relevant privacy laws and Bright Group procedures

We NEVER:

- Collect or store personal data unless it is needed for business purposes
- Share personal information with others unless authorised and compliant with our policies
- Use personal data for any purpose outside of what was disclosed to the individual
- Ignore or fail to report a suspected data breach

4.4 Delegations of Authority

Bright Group's Board have delegated their authority and endorsed a control framework for entering contracts, commitments, managing Company assets and key business activities in the course of conducting Company business.

All Bright Group's personnel are expected to read, understand and adhere to their delegation of authority and to exercise a duty of care with respect to decisions made, and commitments and contracts entered into on behalf of Bright Group.

4.5 Accurate and auditable records

An accurate and auditable record of all financial transactions relating to Bright Group must be maintained in accordance with generally accepted accounting principles.

No entry should be made in Bright Group's records which distorts or disguises the true nature of any transaction. Non-financial records (for example personnel files, environmental documentation, safety records and statistics) must also be accurately and rigorously maintained.

