

Policy – Code of Conduct

Purpose	To outline the expectations of the Organisation (Organisation) about how we all conduct ourselves at work and promote ethical decision-making and behaviour.
Applies to	All employees and any person undertaking work for our Organisation, including contractors working under our operational control and their agents or employees (Workers).
Introduction	Our Code of Conduct (Code) is intended to promote a safe, healthy, ethical and productive workplace that we are proud to be a part of, and where we are held in the highest regard. The Code sets out the: • minimum standards of behaviour that: ○ our customers, suppliers, regulators and stakeholders expect of us ○ we should expect of each other, and • consequences of engaging in behaviour that is not acceptable. Our Code, together with our Values, guides our decisions and actions, and how we conduct business. The standards of behaviour set out in this Code are expected of all Workers during and outside of work hours and/or whenever any Worker's conduct or behaviour has the potential to impact the Organisation or its Workers, customers, suppliers and members of the community. This may include, but is not limited to behaviour: • in the workplace and/or using work related equipment • during work activities, such as a work trip conducted outside normal working hours • at work-related events, such as conferences and social functions (for example, work related functions) • at other times when work is carried out, such as working from home, and • at other times that your behaviour has the potential to impact the Organisation, any Worker or relationships with other Workers, customers, suppliers and members of the community such as activities on social media. The Code should be read in conjunction with the Organisation's policies. The Code may be reviewed, amended, or withdrawn by the Organisation at any time at our absolute discretion.
Values	We are committed to fostering a workplace culture where our employees: • work safe, live safe • are customer-focused and commercially-minded • are honest and accountable • demonstrate respect, and • are collaborative.

Standards of Behaviour

All Workers are responsible for their own behaviour and are expected to conduct themselves in the following manner:

- behave in a way that upholds the Values
- comply with the law and the Organisation's policies, procedures, rules and guidelines
- carry out work to the required standard
- maintain a safe work environment
- maintain ethical personal and professional conduct
- work as one team, treating everyone with fairness and respect and without discrimination, vilification, harassment, bullying or victimisation
- protect confidentiality and not misuse information
- protect the Organisation's resources and property
- support the community and be committed to the environment & sustainability, and
- report serious concerns.

Unacceptable Conduct

The Organisation will not tolerate unacceptable conduct by Workers towards the Organisation, other Workers, customers, suppliers or members of the community. Instances of unacceptable conduct will be managed consistent with the Organisation's *Procedure - Managing Unacceptable Conduct* and *Fair and Just Culture Policy*. Examples of unacceptable conduct include, but is not limited to:

- behaviours that are inconsistent with the Organisation's Values
- behaviours or incidents that could endanger the safety of yourself or others
- behaviours that are inconsistent with your terms and conditions of employment
- dishonesty of any form, including failures to disclose conflicts of interest whether real or perceived/potential conflicts of interest
- failure to follow the lawful and reasonable instruction(s) of the Organisation or its management
- unlawful or fraudulent behaviour including, but not limited to criminal conduct, dishonesty (including by Workers or candidates in recruitment processes) and/or submission of false timesheets, and
- engaging in conduct that negatively impacts on the Organisation and its reputation

Related Documents

Including but not limited to all People policies, procedures and work instructions concerning performance and conduct

Work Health and Safety

All Workers are expected and required to comply with the Organisation's policies, procedures rules, standards and guidelines, and all relevant work health and safety laws. This includes a requirement to take reasonable care for the safety of themselves and others and to report any hazardous conditions in the workplace (including any sites at which you perform work) or any workplace incidents or accidents.

We are all responsible to ensure that we follow the policies, procedures, rules, standards and guidelines that govern the work we do and that we do not deviate from these without explicit written approval from your leader or manager. Workers

performing operational activities must be adequately trained and/or supervised. All Workers must be fit for work, including not being impaired by drugs, alcohol or fatigue.

Related Documents

Including but not limited to all Safety policies, procedures and work instructions concerning electrical safety, Critical Controls, hazard guidelines fatigue management, alcohol and other drugs

Ethical Personal & Professional Conduct

All Workers must act in a safe, professional and ethical manner. Some examples of what this looks like include:

- not engaging in any fraud, corruption, unethical or improper practices
- not using false representations, deception or your position to avoid an obligation or to gain an unjust advantage
- being honest and transparent in your dealings with the Organisation and its stakeholders
- not engaging in conduct that does or has or would have the potential to jeopardise the Organisation's protective security, including personnel, cyber and property security measures.
- treating others, including Workers, customers, suppliers and members of the community with courtesy, respect and dignity
- wearing appropriate attire such as Personal Protective Equipment (PPE) or attire of a professional business appearance as appropriate for your role
- behaving appropriately at work or work-related functions
- being accountable for your decisions and actions
- making decisions in the best interests of the Organisation and not for personal gain or for the benefit of someone else
- ensuring personal relationships do not create a conflict of interest so not to interfere, or appear to interfere, with the interests of the Organisation and the ability to carry out your duties or obligations to the Organisation
- not misusing your position or authority to take part in activities that could cause loss to the Organisation, its customers, suppliers or members of the community
- not participating in any activity outside of your engagement with the Organisation if it impacts on your ability to work ethically or creates a conflict of interest that cannot be managed or removed
- disclosing any actual, potential or perceived personal interests that conflict with your responsibility to act in the best interest of the Organisation and to not obtain any personal benefits as a result of your employment with the Organisation
- appropriately reporting gifts offered in the course of our duties and avoiding everything that could reasonably be construed as a bribe or improper inducement, and
- not making public comment on behalf of the Organisation without consulting with Corporate Affairs and obtaining approval from appropriate members of the Executive Leadership Team.

Related Documents

- Including but not limited to all People policies, procedures and work instructions concerning performance and conduct

**One Team
(Fairness and
Respect)**

We value differences and are committed to providing equal employment opportunity, and a fair, safe, rewarding and inclusive workplace. As such, the Organisation will not tolerate discrimination based on the grounds of any protected attributes, for example, sex or sexual orientation, race, gender or disability or other factors unrelated to a person's merit or the Organisation's legitimate business interest.

Behaviours such as discrimination, vilification, harassment (including sexual harassment), bullying or other unacceptable or offensive conduct, will not be tolerated.

Workers must comply with the Organisation's policies and procedures concerning discrimination, vilification, harassment, bullying and victimisation, in which these matters are set out in greater detail. We also encourage Workers to support others who may be subject to any conduct which constitutes discrimination, vilification, harassment or bullying.

Please refer to the Organisation's relevant policies and procedures on *the Wire*.

Related Documents

Including but not limited to all People policies, procedures and work instructions concerning performance, conduct, workplace bullying, discrimination and harassment

**Confidential
Information &
Privacy**

The Organisation is committed to handling and managing confidential and personal information in accordance with applicable laws, including the Privacy Act.

We must respect the trust placed in us by our peers, stakeholders, regulators, our customers, suppliers and members of the community. This means we must preserve the confidential and sensitive nature of the information we become aware of during our employment or engagement (including personal information or sensitive information).

All Workers must:

- protect confidential information and the confidentiality of any personal information or sensitive information made available to you during your employment or engagement
- take all reasonable and necessary precautions to prevent the disclosure of confidential information and information protected by the Privacy Act
- comply with laws, the Organisation's operating licences, and the Organisation's policies, procedures, rules, standards and guidelines in relation to personal information, organisational security and cyber security, and
- report actual or suspected breaches of confidentiality or privacy legislation in a timely manner.

You must not use or disclose confidential information (including information that is marked as confidential or treated as such, including information about or relating to the Organisation's operations, Workers, customers suppliers or members of the community) unless the use or disclosure is:

- required by law
- made as part of the proper performance of your duties, or
- agreed by the Organisation.

If you are unsure whether information is confidential or protected by privacy legislation, please speak with your manager.

Resources and Property

Assets belonging to the Organisation, including confidential information and intellectual property, must be used professionally and for the benefit of the Organisation and not for personal gain. This includes, and is not limited to:

- telephones, computers, information and telecommunication systems and technology
 - business records
 - vehicles
 - credit cards, accounts and securities, and
 - tools and equipment.
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Community and our commitment to environment, & sustainability

All employees are responsible for maintaining and protecting the environment when carrying out their work duties. You should always consider the impact of their activities on the environment and the local community, including the way in which waste is disposed of, the way chemicals are used and stored and the use of natural resources.

We recognise that Workers may from time to time wish to participate in political activity. If you are unsure about your involvement in community or political activities please speak with your manager.

If you do participate in political activity, you must:

- do so in your personal capacity so that no inference can be drawn that your views are those of the Organisation, and
 - comply with laws at all times.
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Report Serious Concerns

Each of us is responsible for complying with the Code and reporting any concerns. If you become aware of, or suspect any breach of this Code, you must speak up and raise your concerns with:

- The person(s) involved, or
- Your manager/leader, or
- Whistleblowing Hotline – 1800 607 206, or
- Head of Internal Audit (Disclosure Officer) – (02) 8569 7088
- General Counsel & Company Secretary

If you are in any doubt, you should seek advice from your leader or manager before taking any action which may compromise yourself or the Organisation.

Related Documents

Including but not limited to the governance and compliance policies including the Whistleblower Policy

Breaches of the Code

If you breach the Code or any of the Organisation's policies, procedures, rules, standards or guidelines, this may result in disciplinary action consistent with our

Procedure – Managing Unacceptable Conduct, up to and including termination of employment and/or civil or criminal proceedings.

Criminal matters will be reported to the Police and/or other appropriate law enforcement or regulatory bodies.

Related Documents

Including but limited to all People Policies, procedures and work instructions concerning performance and conduct.
