

ActewAGL

Code of conduct



Let's power ahead. **ActewAGL**
Always.

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Introduction

Between now and 2020 ActewAGL will undergo unprecedented change in its commercial and social environment. Established work methods may prove inadequate and we will need to adapt and improve to meet the needs of our community and our owners. It is vital for ActewAGL staff to remain cohesive by supporting each other, valuing and encouraging each others' contributions and efforts. We will develop the skills we need and we must never lose confidence in the capacity of ActewAGL and its people to meet the challenges that lie ahead.

ActewAGL values its staff and is committed to ensuring their health and wellbeing. The organisation does not tolerate discrimination, unsafe work practices, fraudulent behaviour, and other inappropriate behaviour. ActewAGL requires employees to align their behaviour and work practices with this *Code of conduct* and its policies and procedures.

Code of conduct

“As an ActewAGL employee, I will work safely, efficiently and honestly with my colleagues to achieve ActewAGL’s corporate goals and to meet the community’s legitimate and reasonable expectations. I will work hard as a part of the ActewAGL team. I will show integrity and respect my fellow employees, customers and members of the community. In return, ActewAGL will provide a work environment that is fair, free from harassment and safe, where I can develop my skills for mutual benefit and contribute to ActewAGL’s achievements.”

Breaches of the code

Breaches of the code and its guidelines may result in disciplinary action – please refer to the ActewAGL enterprise agreement or your specific management services agreement.

Reporting breaches

If you believe that you or someone else has breached the code, you have a responsibility to report it. In the first instance, you should discuss it with your leader. If you do not feel that this is possible or appropriate, you can discuss it with any member of the ethics committee. If you suspect fraudulent behaviour contact the Manager Security on 6270 7457. If your concerns are not resolved after discussion, contact the Ethics Committee Convenor Tania Hutchison, Director of Human Resources, on 6270 7560 and request that the ethics committee meet to consider your issue and provide a written response.

You can provide anonymous feedback on possible breaches of the *Code of conduct*. These matters will be evaluated confidentially, ignored if unwarranted or followed up if justified.

If you report a breach, you are protected from victimisation and threatening behaviour as specified in the *Corporations Act 2001*. The *Public Interest Disclosure Act 1994* of the ACT provides detailed information about the protection of people reporting illegal behaviour related to ActewAGL or ACTEW.

For more information about reporting breaches please refer to *Corporate Procedure 7.3 P7 – Reporting Fraud and Wrongful Behaviour*.

Guidelines

ActewAGL's transition up to 2020 will engage the entire organisation and requires employees to adhere to and demonstrate the following values and to note the Code's guidelines.

“As an ActewAGL employee, I will develop the skills I need to succeed and contribute to a culture of adaptability, commercial agility and enthusiasm to embrace change. I will help create a culture in which safety is deeply embedded.”

To achieve this, employees must:

- be competent in the areas in which they work and continue to develop skills and competencies
- work cohesively with colleagues to achieve divisional and corporate goals
- treat everyone with respect and courtesy
- demonstrate the principles of *Always safe* in all aspects of their work to minimise health, safety and environmental risks
- help achieve ActewAGL's goal of eliminating work-related injuries
- create and maintain a culture that is free from harassment, discrimination and bullying
- maintain a high work output, be optimistic, and share achievements with colleagues.

“I will continue to deliver existing business activities in a way that is responsive to a new industry landscape through continual improvement and improved efficiency.”

To do this, employees will:

- contribute to corporate adaptation and flexibility so that ActewAGL copes smoothly with changes in its business sector
- value communication, consultation, cooperation and input from all employees on matters that affect them
- be familiar with, and adhere to, all relevant corporate policies and procedures, and follow established protocols

- consider relevant environmental issues in all planning and operations
- be familiar with and work towards goals as outlined in ActewAGL's Environment Management Plan
- adopt environmentally friendly practices into everyday work duties.

"I will contribute to innovative ways of building customer loyalty."

To build customer loyalty, employees will:

- carry out their jobs to the best of their abilities
- provide outstanding service to internal and external customers
- behave honestly and with integrity and fairness
- maintain and respect confidentiality agreements
- handle personal information in line with the *Information Privacy Principles*
- be polite and professional in their interactions with customers and other stakeholders
- deliver quality outcomes in a timely and professional manner.

"I will contribute to the expansion of ActewAGL's business interests to enable growth through judicious investments."

To help grow ActewAGL's core businesses, employees will:

- work with all relevant parties to achieve the best outcome for ActewAGL, and its owners
- seek business development opportunities and continue to further develop their personal skills and experience
- share their wealth of knowledge, skills and experience with other ActewAGL employees to help them achieve their goals.

“I will focus on community interaction and upholding ActewAGL’s corporate reputation under the one strong joint venture brand.”

To uphold ActewAGL’s corporate reputation in the community, employees must:

- comply with all relevant legislation, codes and standards covering ActewAGL’s operations
- exercise due care and diligence in fulfilling our duties and not make improper use of powers, property or equipment
- avoid, or disclose where appropriate, conflicts of interest
- not accept, directly or indirectly, payments, gifts or entertainment of any value from any supplier or company if it is likely to influence, or be perceived to influence, their judgment when choosing goods or services. Details of gifts received worth more than \$100 must be reported to their leaders
- comply with ring fencing guidelines to ensure ActewAGL Retail does not have an unfair advantage over other retailers
- behave in a way that upholds ActewAGL’s good reputation and code of conduct – *see the public comment section on page 9*
- avoid putting ActewAGL at risk of incurring fines, damages or other legal costs
- consider the environmental impact of works and not engage in any unauthorised works that may harm the environment or damage the reputation of ActewAGL
- respect the rights of employees, customers, suppliers, shareholders and the community, and ensure they meet their legal and other obligations
- treat all submissions, applications and representations received by ActewAGL equally and judge them only on their merit.

Protection for individuals

ActewAGL will indemnify employees against personal liability that arises from the performance of their duties, unless in the reasonable opinion of the CEO the employee did the wrong thing deliberately or was grossly negligent.

Decision making – should I report behaviour?

If you have doubts about whether a specific action or decision complies with the code, and it does not fall into one of the points in the guidelines, ask yourself the following questions.

- Will it cause embarrassment if someone else knows about it?
- Is it likely to be unlawful?
- Is there a chance that it would have a negative impact on ActewAGL?
- Would the Chief Executive Officer or other senior executives be disappointed by it?
- Is the media likely to think it would make a good “disclosure” story?

If you answered ‘**yes**’ to any of these questions, discuss the matter with your leader or a member of the ethics committee before you proceed.

If you answered ‘**no**’ to all of these questions, but you are still not entirely certain, you can:

- if acting under direction, ask that all instructions or decisions are put in writing
- document all of your actions, directions and conversations relating to the matter.

Conflict of interest

Having a conflict of interest is not wrong, but not *disclosing* it could be a breach of the code.

Conflicts of interest exist when it is likely that you could be influenced, or seen to be influenced, by a personal interest when carrying out your duties. Some examples are:

- having a financial interest in a matter that ActewAGL deals with, or having friends or relatives with such an interest that you are aware of
- having a personal, philosophical, religious, moral or political belief or attitude that could influence, or be seen to influence, the impartiality of your decisions
- having or developing personal relationships with people that ActewAGL is dealing with or investigating, that go beyond the level of a professional working relationship
- accepting secondary employment that may, or may appear to, compromise your integrity and the integrity of ActewAGL
- participating in political activities or making political comment that may relate to, or be seen to relate to, ActewAGL's business.

Detailed information about conflicts of interest, including recommended strategies for better practice, is available in *Corporate Policy Number 4.0 – Conflict of Roles*.

Public comment

As ActewAGL employees, any comments that we make concerning our business can be taken seriously, and could have adverse effects for the organisation. For example:

- your comments might be used against ActewAGL in a court of law
- they might be reported out of context by the media
- you could inadvertently admit liability for something and invalidate a potential claim under our insurance contract.

All employees are obliged to ensure that all confidential information obtained through their role is not disclosed inappropriately to third parties. This includes speaking to the media, posting information on the internet/social networking sites and private conversations with friends, family and associates. Proven breaches of confidentiality can be grounds for dismissal.

If anyone from the media asks for a comment from you as an ActewAGL employee, suggest that they call the 24-hour media phone on **0414 515 359**. This is especially important in an emergency situation.

In situations that may result in an insurance claim, do not tell people that ActewAGL is responsible or will pay for any damage. Refer them to the Manager Insurance on 0421 931 443 or 6248 3036 to discuss any claim they wish to make against ActewAGL.

Ethics committee

The ethics committee is comprised of the following representatives from each of the key business units to assist and provide advice to staff about the *Code of conduct* and to clarify uncertainty.

Executive representatives

Convenor - Tania Hutchison, Director Human Resources (6270 7560)

Executive Representative - Norris Robertson, Director Internal Audit (6248 3540)

Divisional representatives

Water division – Joe Cortese (6242 1405)

Networks division – Charlie Flask (6293 5739)

Retail division – Kim Wrigley (6248 3319)

The ethics committee is responsible for:

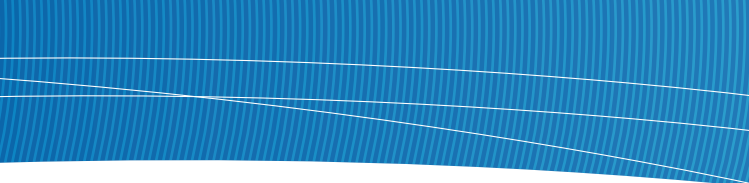
- reviewing and updating the *Code of conduct*

- providing advice as to whether a potential action may be in breach of the code
- investigating and reporting possible breaches of the code to relevant parties.

The ethics committee will meet to discuss ethical issues as the need arises, or upon a request by any member of the organisation.

Corporate policy

Information contained in this publication is also available on the intranet under *corporate policies and procedures – policy 3.1*.



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Always.

ActewAGL Retail ABN 46 221 314 841 a partnership of ACTEW Retail Ltd ABN 23 074 371 207
and AGL ACT Retail Investments Pty Ltd ABN 53 093 631 586.