

1. Scope

This document applies to all ActewAGL workers¹.

2. Purpose

The *Code of Conduct* outlines how we are expected to behave at work. Its purpose is to:

- demonstrate the business's commitment to employees and employees' commitment to the business
- provide guidelines to assist workers to make the right choices
- highlight key policies and directives that workers are expected to uphold at all times.

3. Applicability

The *Code of Conduct* applies to all ActewAGL workers when they are formally or informally representing the business. This may include, but is not limited to, workers:

- performing their duties
- representing or acting on behalf ActewAGL
- attending work-related social events
- wearing ActewAGL branded clothing in public areas.

4. Our commitment

In everything we do as employees, we always:

- know it's all about the customer
- get things done
- get things done safely
- only do things that add value and reduce risk
- embrace change and welcome responsibility
- show respect to all.

To assist workers to carry out their duties in alignment with the *Code of Conduct*, the business commits to:

- build a diverse workforce where individual differences and attributes are respected and valued
- ensure the health and wellbeing of workers
- create a workplace that does not tolerate discrimination, unsafe work practices, fraudulent behaviour or other inappropriate behaviour
- provide workers with resources, tools and training necessary to carry out their duties.

In return, workers are expected to align their behaviour and actions to the *Code of Conduct* at all times when representing the business.

¹ As defined in the Work Health and Safety Act 2011 (ACT), a worker is a person who carries out work in any capacity including an employee, contractor, employee of sub-contractors, labour hire worker, apprentice, student or volunteer.

5. Guidelines

The business requires all workers to adhere to the following guidelines.

5.1 Our culture

In everything we do, we always:

- demonstrate the principles of *Always Safe* in all aspects of our work to minimise health, safety and environmental risks
- create and maintain a workplace free from harassment, discrimination and bullying
- act with honesty and integrity, treating others with respect and courtesy
- continue to develop and maintain skills and competencies in the areas in which we work
- embrace change and work cohesively with colleagues to achieve divisional, corporate and organisational goals
- maintain a high work output, a positive attitude, and share achievements with colleagues.

5.2 Our customers

To meet our customer needs and deliver outstanding customer service, we will:

- carry out our jobs to the best of our 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 applicable *Privacy Principles* and laws
- be polite and professional in interactions with customers and other stakeholders
- deliver quality outcomes in a timely and professional manner.

5.3 Our business

To help grow core businesses and to protect the business's interests, we will:

- value communication, consultation, cooperation and input from all employees on matters that affect us
- be familiar with, and adhere to, all relevant corporate policies and procedures, and follow established protocols
- be familiar with and work towards goals as outlined in the *Environment Management Plan*
- adopt environmentally friendly practices into everyday work duties
- work with relevant parties to achieve the best outcome for the business and its owners
- share our wealth of knowledge, skills and experience with other employees to help them achieve their goals.

5.4 Our reputation

To uphold the business' corporate reputation in the community, we must:

- comply with all relevant legislation, codes and standards covering the business' operations
- exercise due care and diligence in fulfilling our duties and not make improper use of powers, property or equipment
- report, accept or dispose of gifts in line with the *Acceptance of gifts, benefits, or hospitality procedure*
- comply with ring fencing guidelines to ensure the Distribution Partnership does not provide an unfair advantage to related electricity service providers over their competitors
- behave in a way that upholds the business's good reputation and *Code of Conduct*
- avoid putting the business 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 the business
- respect the rights of employees, customers, suppliers, shareholders and the community
- treat all submissions, applications and representations received by the business equally and judge them only on their merit.

6. Key policies and directives

6.1 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 the business 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 the business 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 the business
- participating in activities *that cause detriment to the business* or making public comments without making clear the opinions expressed are your own and do not represent ActewAGL.

Detailed information about conflicts of interest, including recommended strategies for better practice, is available in the *Conflict of Interest Guide*.

6.2 Public comment

Workers are obliged to ensure that all confidential information obtained through their role is not disclosed inappropriately to third parties. This includes, but is not limited to, 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 disciplinary action or dismissal. As such it is expected that employees:

- follow the *Media Contact Procedure* and direct all media enquiries to the 24-hour media phone number 0414 515 359
- in situations that could result in a potential general insurance claim, do not make any statements or inform others of the business's responsibility for any claim or payment. Contact the Corporate Commercial Services to discuss any insurance issues and potential claims.

6.3 Modern Slavery Act

We take a zero-tolerance approach to modern slavery and pride ourselves on conducting our business ethically and with integrity. We are committed to ensuring that modern slavery does not take place in any part of our business or supply chains. To do this we will continually review our procurement processes and maintain effective systems and controls to ensure we do not cause, contribute or are in any way linked to, modern slavery practices.

7. Applying the code

To encourage application of the *Code of Conduct* the business will:

- indemnify employees against personal liability that arises from the performance of their duties, unless the employee did the wrong thing deliberately or was grossly negligent
- protect those who report breaches as set out in the *Whistleblower Procedure*.

Understanding the protections provided by the business under the *Code of Conduct*, if you believe you or someone else has breached the code, you have a responsibility to report it. When considering if a behaviour or work practice should be reported, you should consider:

- if the behaviour or work practice is in alignment with *Code of Conduct*
- if the behaviour or work practice is likely to be lawful
- if the behaviour or work practice is likely to have a negative impact on the workplace or business
- if the behaviour or work practice would cause embarrassment to you or others if someone else were to find out about it.

If you determine that a behaviour or work practice may be a breach of the code, it should be:

- disclosed to your immediate supervisor, People Solutions Business Partner, or Divisional Executive. If necessary, you may escalate the disclosure to the General Manager People and Legal.
- disclosed to the independent disclosure avenue managed by Deloitte. Contact via **1800 233 285** or **actewagl@deloittedigital.com**

Reported breaches of the code will be handled as per the Whistleblower Procedure. If a breach is identified it may result in disciplinary actions. Please refer to the enterprise agreement or the relevant management services agreement for further details on disciplinary actions.