

# CODE OF CONDUCT

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## 1. SCOPE

All ActewAGL Joint Venture workers, operating within or for ActewAGL, including Evoenergy, must be aware of and commit to applying the principles and processes of this procedure. 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.

## 2. PURPOSE

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

- Articulate obligations of the business and workers
- 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 of ActewAGL
- attending work-related social events
- using social media
- wearing ActewAGL branded clothing in public areas.

## 4. OUR COMMITMENT

The business commits to:

- ensuring the safety, health and wellbeing of workers
- building a diverse workforce where individual differences and attributes are respected and valued
- creating a workplace that does not tolerate discrimination, unsafe work practices, fraudulent behaviour or other inappropriate behaviour
- providing workers with the 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* and commit to:

- Maintaining focus on the customer
- Getting things done safely
- Only doing things that add value and reduce risk
- Embracing change and welcoming responsibility
- Showing respect to all.

## 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 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 business and to protect the business' interests, workers will:

- value communication, cooperation and input from all employees on matters that affect us
- adhere to all relevant corporate policies and procedures
- adopt sustainable and environmentally friendly practices into everyday work duties
- work with relevant parties to achieve the best outcome for the business and its owners
- share knowledge, skills and experience with others to achieve business goals.

### 5.4 Our Reputation

To uphold the business' corporate reputation in the community, workers 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 ringfencing 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' good reputation
- 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

Conflicts of interest exist when it is likely that a worker could be influenced, or seen to be influenced, by a personal interest when carrying out their duties. Workers must disclose potential conflicts of interest in a timely manner. 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.

### 6.2 Public Comment

Workers are obliged to ensure that all confidential information obtained through their roles 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 workers:

- 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' responsibility for any claim or payment.

### 6.3 Modern Slavery Act

The ActewAGL Joint Venture has a zero-tolerance approach to modern slavery and is committed to conducting operations ethically and with integrity. The business commits to ensuring modern slavery does not occur in any part of our business or supply chains. The business will continually review its procurement processes and maintain effective systems and controls to ensure we do not cause, contribute to 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 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**, [actewagl@deloitte.digital](mailto:actewagl@deloitte.digital) or log in to [www.actewagl.deloittedigital.com](http://www.actewagl.deloittedigital.com) username: actewagl password: fraud1!

Reported breaches of the code will be handled in accordance with the *Whistleblower Procedure*. If a breach is identified it may result in disciplinary action.

## 8. RESPONSIBILITIES

POSITION	RESPONSIBILITY
Executive Management Team	<ul style="list-style-type: none"> <li>• Taking appropriate action upon receipt of a complaint, including investigating and reporting possible breaches of the code to relevant parties and providing advice as to whether a potential action may be in breach of the code.</li> </ul>
General Manager People and Legal	<ul style="list-style-type: none"> <li>• Taking appropriate action upon receipt of a complaint.</li> <li>• Determining appropriate disciplinary action where necessary, in consultation with the relevant GM.</li> <li>• Reviewing and updating the <i>Code of Conduct</i>.</li> </ul>
People Solutions Business Partners	<ul style="list-style-type: none"> <li>• Referring complaints to the General Manager People and Legal.</li> </ul>

## 9. REFERENCES

- [Acceptance of Gifts Benefits or Hospitality](#)
- [Conflict of Interest](#)
- [Media Contact](#)
- [Whistleblower Procedure](#)