

Code of conduct

Key summary points

- The Code ensures all workers understand and uphold ActewAGL's standards of honesty, integrity, and ethical conduct while representing the company.
- Its purpose is to guide workers to act lawfully and ethically, protect stakeholder interests, and take responsibility for their conduct in line with ActewAGL's values.

1 Scope

This code applies to all workers across the ActewAGL Joint Venture. 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.

It is in addition to any fiduciary duties and other legal obligations which may apply to ActewAGL Joint Venture workers. Workers must comply with all ActewAGL Joint Venture policies and procedures as amended from time to time. All ActewAGL Joint Venture policies and procedures are accessible via The Grid.

2 Purpose

The purpose of the Code is to place an obligation on all workers to:

- possess a clear understanding of the standard of conduct expected when performing duties and representing the ActewAGL Joint Venture in the community
- uphold the high standards of honesty, integrity, ethical and law-abiding behaviour expected of ActewAGL Joint Venture workers and take accountability for their conduct
- act in accordance with the Code to protect and promote the interests of ActewAGL's shareholders and stakeholders, including employees, customers and the community
- report any violations of the Code in accordance with ActewAGL's processes.

3 Application

The Code applies to all workers when they are formally or informally representing the business. This includes, but is not limited to, workers:

- performing their duties
- representing or acting on behalf of ActewAGL
- attending work-related social events
- using social media
- driving ActewAGL/Evoenergy branded vehicles
- wearing ActewAGL/Evoenergy branded clothing in public.

4 Commitment

The ActewAGL Joint Venture 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 or other inappropriate behaviour
- providing workers with the resources, tools and training necessary to carry out their duties.

The ActewAGL Joint Venture will:

- indemnify workers against personal liability that arises from the performance of their duties, unless the mistake or damage suffered by the worker is due to the worker's own recklessness, wilful misconduct, or gross negligence
- protect those who make a protected disclosure as set out in the *Whistleblower Procedure*.

Workers are expected to align their behaviour and actions to the Code and our Core Values:

- **Lead with safety**, including through the following behaviours:
 - We respect and take care of each other, our customers and community.
 - We are inclusive, speak up and act with integrity.
- **Better every day**, including through the following behaviours:
 - We learn, adapt and improve every day.
 - We take ownership, innovate and deliver.
- **Build tomorrow together**, including through the following behaviours:
 - We work as a team, with our customers and community.
 - We plan with purpose, collaborate and partner for success.

5 Standards of conduct

All workers must:

Culture

- Demonstrate safety and wellbeing for themselves and others in all aspects of 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 they work.
- Work cohesively with colleagues to achieve team, divisional and organisational goals.
- Accept that they work in a constantly evolving industry and that change is inevitable.
- Maintain a high work output, a positive attitude, and share achievements with colleagues.

Customers

- Strive to provide outstanding service to internal and external customers.
- 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.

Operations

- Adhere to all applicable policies and procedures.
- Advise the business of any change to their personal circumstances that may impact their ability to perform their duties and immediately disclose any new criminal convictions or pending criminal charges they may be facing.
- Comply with applicable ringfencing guidelines to ensure the Distribution Partnership does not provide an unfair advantage to related electricity service providers over their competitors.
- 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.

Reputation

- Comply with all relevant legislation, codes and standards covering the business' operations.
- Exercise due care and diligence in fulfilling their 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.
- Behave in a way that upholds the good reputation of the business.
- 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.
- Treat all submissions, applications and representations received by the business equally and judge them only on their merit.

6 Key directives

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 actual, potential or perceived conflicts of interest in a timely manner. Examples include:

- having a financial interest in a matter that the business deals with, or having friends or relatives with such an interest that the worker is aware of
- having a personal, philosophical, religious, moral or political belief or attitude that could influence, or be seen to influence, the impartiality of the worker's decisions
- having or developing personal relationships with people, beyond the level of a professional working relationship, where the worker knows that the business is dealing with or investigating those people
- 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.

Confidentiality and public comment

Workers must 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 up to and including termination. Workers must follow the [All Media Engagement Standard](#) and direct all media enquiries to the media phone **(0414 515 359)**.

In situations that could result in a potential general insurance claim, Workers must not make any statements or inform others of the business' responsibility for any claim or payment.

7 Addressing possible breaches of the code

Workers must report promptly and in good faith any actual or suspected breach of this Code.

Any legal and compliance issues must be reported without delay to the relevant Executive and, where appropriate, the Board. Where non-compliance is identified, appropriate rectification or other appropriate action and steps will be taken to prevent any repetition of the non-compliance.

Reports of other potential Code breaches should be made to one of the following:

- the worker's supervisor
- Manager Internal Audit and Fraud Control
- General Manager People and Legal
- Group Manager People and Corporate Affairs or the relevant People Business Partner
- the relevant General Manager
- Chief Executive Officer

- the [Whistleblower Program](#) managed by Deloitte.

In responding to complaints, ActewAGL will:

- take all complaints seriously
- investigate complaints internally or through an independent service provider
- take reasonable steps to ensure any worker who makes a complaint in good faith is protected from victimisation or discrimination for making the complaint.

Workers who breach the Code may face disciplinary action up to and including termination of employment in accordance with the relevant disciplinary provisions.

8 References

- [Acceptance of Gifts Benefits or Hospitality](#)
- [All Media Engagement Standard](#)
- [Whistleblower Procedure](#)

9 Version control

Version	Details	Updated
2.0	Removal of Ethics Committee, values prioritised	Director Human Resources, 13/7/12
3.0	Paragraphs re-ordered, no content change	Director Human Resources, 13/9/12
5.0	Review and update the Code of Conduct	Executive April 2016
6.0	Updated issue and next review dates	Director People and Performance 2017
7.0	Minor updates	General Manager People 2018
8.0	Document restructured and placed into new template. Modern slavery act added	General Manager People and Safety May 2020
9.0	Document streamlined and updated, inclusion of disclosure of criminal charges	Safety Audit and Risk Committee (endorsed, 26 August 2024)
10	Section 5: Added “new criminal convictions” to disclose requirement Section 6: Added “perceived” to disclose requirement	General Manager People & Legal
11	Section 4: Added joint venture core values and behaviours, updated onto current template	General Manager People & Legal

10 Document control

Document owner	Document custodian	Published date	Review date
General Manager People and Legal	Group Manager People and Corporate Affairs	16/12/2025	16/12/2028