



CODE OF **CONDUCT**



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SUNWATER'S VALUES



VALUE PEOPLE

We are the sum of our parts, and everyone matters



WORK TOGETHER

We are our best when we work together as one SunWater and with our stakeholders front of mind



TAKE RESPONSIBILITY

This is a concerted, strategic effort — we all have a part to play to deliver on our promise



INTRODUCTION FROM THE CEO

SunWater is committed to providing professional and high quality services with honesty and integrity. We have a strong commitment to the community and environment and must take responsibility in all of our business dealings and decision-making processes, as this is a part of our social licence to operate.

We respect and value our people, customers and local communities and work together to treat them accordingly. We also value SunWater's resources, including our information and knowledge and we are committed to ensuring they are used efficiently and effectively, for the purposes for which they are intended.

The SunWater Code of Conduct applies to all SunWater employees as well as contractors, consultants, volunteers or anyone working at SunWater (individuals). It applies whenever an individual is representing SunWater. This includes, without limitation: in the workplace, travelling for work purposes and during off-site work functions. It may also be applicable outside working hours as it is important that individuals consider how their behaviour will reflect on SunWater.

This Code of Conduct outlines the ethical standards and principles of acceptable behaviour expected of all individuals at SunWater. It provides guidance on how to deal with ethical conflicts of interest that may arise and the mechanisms for reporting and dealing with breaches of the Code of Conduct.

While the Code of Conduct does not explicitly discuss every ethical issue individuals may encounter during their employment with SunWater, it does provide the key principles which should be used to guide decisions and behaviours.

SunWater's values are our pillars and foundation and form an essential part of the Code of Conduct. They guide the way we work on a day-to-day basis and the way in which we deliver products and services to customers and the community.

Nicole Hollows
Chief Executive Officer, SunWater

RESPONSIBILITIES UNDER THE CODE OF CONDUCT

MANAGERS AND SUPERVISORS

- Ensuring all individuals have access to and understand the SunWater Code of Conduct, relevant SunWater policies, procedures, standards and legislation impacting their role.
- Acting in accordance with the Code of Conduct to positively promote and actively role model the SunWater values and behaviours to support the delivery of our services.
- Reporting and addressing any breaches or suspected breaches of the Code of Conduct.

INDIVIDUALS

- Familiarising themselves with the Code of Conduct and relevant SunWater policies, procedures, standards and legislation impacting their role.
- Acting in accordance with the Code of Conduct.
- Seeking guidance if an ethical issue arises.
- Declaring and resolving any potential or actual conflict of interest.
- Reporting suspected breaches of the Code of Conduct.

It is the responsibility of each and every person to set the highest standards for themselves, to monitor their own behaviour, and to notify the appropriate person if the conduct of others is not aligned to the Code of Conduct.

REPORTING BREACHES

SunWater is committed to an open and accountable workplace where employees may, in good faith, raise concerns about suspected misconduct or breaches of this Code of Conduct without fear of unfair treatment or reprisal.

SunWater expects any employee who suspects misconduct or a breach of the Code of Conduct to report it to their immediate supervisor. If, due to the circumstances, this is inappropriate or impractical, individuals should contact one of the following:

- the relevant Senior Manager, General Manager or Executive General Manager
- the General Manager, People and Culture
- the Chief Executive Officer.

SunWater also expects individuals to be familiar with the Whistleblower Protection provisions and the Corrupt Conduct Policy and Guide and, where appropriate, report matters in accordance with these policies to the SunWater Whistleblower Hotline.

To submit a potential allegation, using the SunWater Whistleblower Hotline, call 1800 339 276 (toll free) or make a report via the EthicsPoint website and a Contact Centre Specialist will facilitate the call to gather all required information.

CONSEQUENCES OF MISCONDUCT

Misconduct may lead to disciplinary action being taken against an individual which can include termination of employment or contract. Misconduct will be addressed in accordance with the Misconduct and Discipline Policy and Guide.

CRIMINAL OFFENCES

If an individual is charged with an indictable offence or convicted of a criminal offence, they must notify their supervisor immediately. Depending on the nature of the offence, SunWater may take disciplinary action against the individual, which may include termination of employment or contract.

CONFLICTS BETWEEN CODES OF CONDUCT

Where there is any conflict between this Code of Conduct and any other professional Code of Conduct, individuals must abide by this Code of Conduct. However, if discrepancies are identified, they should be discussed with a supervisor immediately.

PRINCIPLES OF THE CODE OF CONDUCT



VALUE PEOPLE

PRINCIPLE 1. **WORKING SAFELY**

SunWater is committed to ensuring the safety of all individuals, visitors and the public. This means all individuals are responsible for putting safety first and ensuring they do not engage in any behaviour that may put themselves or others in danger.

SunWater has a set of Safety Absolutes that establish standards for all individuals to abide by.

Examples of behaviours that breach this principle

- Coming to work and/or working while affected by alcohol or drugs.
- Drinking alcohol on the job outside authorised functions.
- Tampering with safety equipment or performing unsafe or illegal actions in SunWater vehicles.
- Ignoring unsafe situations or practices in the workplace.
- Not completing appropriate risk assessments (SLAMS or SWMS) where required.



WORK TOGETHER

PRINCIPLE 2. **RESPECTING OTHERS AND WORKING TOGETHER**

SunWater is serious about the fair and respectful treatment of individuals and other key stakeholders. All individuals working on SunWater premises are expected to treat each other with respect, fairness and courtesy.

SunWater respects and values its people and other key stakeholders and treats them accordingly.

The key principles that must guide your decisions and behaviours in this area are:

- Treating individuals courteously and with respect and taking into account others' rights and views.
- Working safely by maintaining and promoting a workplace that as far as is reasonably practicable, is free from unacceptable workplace behaviour.
- Supporting individuals who have experienced or reported unacceptable workplace behaviour as well as the individual about whom the complaint has been made.
- Cooperating with investigations into unacceptable workplace behaviour.
- Recognising that reasonable management actions are not unacceptable workplace behaviour.
- Discouraging and not engaging in unacceptable workplace behaviour.

Examples of unacceptable behaviours

(which includes discrimination, sexual harassment, workplace bullying, vilification and victimisation)

- Purposefully excluding colleagues from meetings, gatherings and decision-making processes.
- Speaking aggressively or swearing at individuals.
- Displaying sexually explicit posters or other material that may offend colleagues.
- Telling jokes that may offend colleagues.
- Supervisors not taking reports or complaints seriously or not ensuring natural justice.
- Spreading misinformation or malicious rumours.
- Treating an individual differently because of their race.
- Making a baseless complaint or report about an individual.
- Posting offensive or insulting comments about another employee on social media.

PRINCIPLES OF THE CODE OF CONDUCT



TAKE RESPONSIBILITY

PRINCIPLE 3. **HONESTY AND INTEGRITY**

All individuals will demonstrate honesty and integrity in order to earn and maintain the trust and respect of other individuals and stakeholders. All individuals have a responsibility to fulfil their role to the best of their ability and avoid activities that may bring SunWater into disrepute.

This includes:

- Using delegations, authorities and influence appropriately and not for personal or other advantage.
- Being honest and impartial in the provision of advice, the preparation of reports and recommendations and in all aspects of customer service.
- Making selection decisions in accordance with the principles of merit and equity.
- Acting responsibly and being accountable for our actions and decisions.
- Carrying out lawful, safe and reasonable directions from managers or supervisors who are delegated to give such direction.
- Following business rules, policies, standards and procedures.
- Creating, managing and retaining appropriate written records about decisions made, actions taken and time worked.
- Working constructively to resolve problems in the workplace arising through error, incorrect decision or changed circumstances.

CONFLICTS OF INTEREST

Employees must take care to ensure that their financial, personal and/or other interests, and actions, do not conflict or appear to conflict directly or indirectly with their work and obligations to SunWater. If they do arise, such conflicts must be resolved with regard to the best interests of SunWater.

Potential and actual conflicts of interest may arise through situations involving:

- financial interests such as being a director or officer of an entity that has dealings with SunWater or may be a competitor
- personal or family related interests such as making recruitment decisions about family members
- political and/or community interests such as being a member of a political party, lobby group or community organisation with a purpose that is relevant to SunWater
- external/secondary employment
- acceptance of gifts and benefits.

ACCEPTING GIFTS AND BENEFITS

Employees must not seek or encourage others to give them any gift or benefit in connection with performing their role.

In accepting gifts, employees should be aware of the principles set out in SunWater's standards and the disclosure and reporting requirements.

In particular, restrictions on the acceptance of gifts should be noted by employees involved in procurement or procurement processes.

PRINCIPLES OF THE CODE OF CONDUCT

EXTERNAL EMPLOYMENT, BUSINESS INTERESTS OR VOLUNTARY WORK

Generally employees may engage in external employment, business interests or voluntary work outside SunWater, providing that it does not pose an actual or apparent conflict of interest or adversely affect the employee's ability to undertake their SunWater duties.

Business interests include having an interest in (whether financial or not), or control of (whether personally or through a spouse or relatives) an entity which is external to SunWater.

Written manager approval is required prior to engaging in external employment or a business interest, and the following conditions must be declared:

- The external employment or business interest is not an actual or apparent conflict of interest.
- SunWater's resources including intellectual property are not being used in undertaking the external employment or business interest.
- The external employment or business interest will not negatively affect SunWater's reputation.
- The external employment or business interest does not involve work SunWater is currently undertaking.
- The external employment or business interest is not undertaken during the normal SunWater working hours or for such time periods that the employee is too fatigued to carry out their SunWater role safely and effectively.

WHAT IF A CONFLICT ARISES?

Employees must declare a potential or actual conflict of interest if it arises and seek guidance and approval from their supervisor about how to proceed.

Employees should ask themselves the following questions:

- Will this situation impact my ability to perform my job?
- Could this situation be perceived by others, either internal or external to SunWater, as a conflict of interest?
- Can I continue to make impartial decisions?

Examples of behaviours that breach the principles of Honesty and Integrity

- Working the night shift in a secondary job and coming to work without adequate sleep.
- Accepting corporate box tickets to the rugby without seeking approval and without recording the gift.
- Being involved in a tendering process and not declaring personal interests in a company tendering for work.
- Hiring a friend or family member without declaring the relationship.
- Knowingly providing false or misleading information to a regulator.
- Accepting a bribe for providing confidential SunWater information.
- Cheating on your timesheet.
- Covering up or not reporting environmental incidents/issues.

PRINCIPLES OF THE CODE OF CONDUCT



TAKE RESPONSIBILITY

PRINCIPLE 4.

PROPER USE OF SUNWATER RESOURCES

Individuals must ensure that SunWater resources are used efficiently, economically and for the purpose for which they were provided and intended. This includes SunWater's time.

Whilst at work, individuals must ensure they use their time effectively for SunWater business. In addition, supervisors must ensure they allocate resources efficiently and effectively to maximise the achievement of business outcomes.

Examples of behaviours that breach this principle

- Downloading, storing or distributing pornography on SunWater owned ICT facilities and devices.
- Using SunWater resources to conduct personal business for personal gain or profit (e.g. tools, lawn mowers, computers, printers etc).
- Storing and/or forwarding inappropriate jokes and graphics, particularly any material of a sexually explicit, racist, defamatory or offensive nature.
- Creating or maintaining personal websites using SunWater resources.
- Inappropriate behaviour while wearing SunWater corporate clothing.

USING SUNWATER RESOURCES FOR PRIVATE PURPOSES

As a rule, SunWater resources cannot be used for private purposes. However, limited use may be acceptable with prior supervisor approval, subject to any specific local policy or direction.

Generally the following minimum requirements must be met for approval:

- Resources are used in the individual's own time.
- Usage does not risk the safety of others.
- Any equipment is secured, properly cared for and fit and ready for business use upon return. Any damage to SunWater equipment or property must be reported immediately and repairs paid for.
- The usage does not prevent, disrupt or delay SunWater operational activities or damage SunWater's image and/or reputation.
- Consumables are provided by the individual, for example paper, fuel etc.
- The usage must not incur a cost or an FBT liability for SunWater.



PRINCIPLES OF THE CODE OF CONDUCT



**TAKE
RESPONSIBILITY**

PRINCIPLE 5. **APPROPRIATE USE OF SUNWATER INFORMATION**

Individuals must ensure that SunWater information is managed appropriately to enable efficient commercial business practices, regulatory accountability and to prevent unauthorised access. This includes information kept in both hard copy and electronic formats.



DO:

- Share information openly, honestly and appropriately to assist SunWater to achieve business outcomes.
- Store information in accordance with SunWater's ICT Records Management Policy and Guide to ensure appropriate access, confidentiality and security of information.
- Maintain the privacy of personal information about individuals and other key stakeholders ensuring it is only used for the legitimate, permitted purposes for which it was collected.

DO NOT:

- Disclose confidential information inside or outside SunWater unless authorised to do so.
- Release information for which SunWater holds intellectual property rights e.g. SunWater reports, maps or software to external parties without seeking prior approval.
- Reproduce third party materials without appropriate attribution or a written licence or permission. This may represent a breach of copyright laws.
- Use intellectual property not belonging to SunWater, unless authorised by the owner to do so.
- Make any public comments about SunWater unless specifically authorised to do so. This includes comments on social media as outlined in the relevant SunWater standards and procedures.

If authorised to make public comment, ensure it is consistent with SunWater's official view and does not have the potential to impact negatively on SunWater's business.

Examples of behaviours that breach this principle

- Copying reports or training materials in breach of copyright.
- Sharing information with SunWater competitors about future SunWater business ventures.
- Giving out personal contact details.
- Speaking negatively about SunWater to customers or members of the public.
- Talking about a confidential matter you are working on to a colleague when you are not authorised to discuss the matter.
- Using a private email channel to manage SunWater's information.

People & Culture is responsible for the Code of Conduct.

If you have any queries regarding this document, you can contact the General Manager People & Culture.

