



SunWater Code of Conduct

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INTRODUCTION FROM THE CEO

The SunWater Code of Conduct applies to **all** SunWater employees as well as contractors and consultants working on SunWater premises or representing SunWater in the marketplace. It applies in the workplace and also to travelling for work purposes. It may also be applicable outside working hours as it is important that employees consider how their behaviour will reflect on SunWater.

As a leader in water infrastructure development and management, SunWater is committed to providing professional and high quality services to our clients and doing so with honesty and integrity. We have a strong commitment to the community and environment and must be responsible in all of our business dealings and decision-making processes. We respect and value our people and our clients and treat them accordingly. We also value SunWater's resources, including our information and knowledge, and commit to ensuring they are used efficiently and effectively for the purposes for which they are intended.

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.

YOUR RESPONSIBILITIES

Supervisors are responsible for:-

- 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 and demonstrating desired SunWater behaviours.
- Reporting and addressing any breaches of the Code of Conduct.

Individuals are responsible for:-

- 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 and declaring and resolving any potential or actual conflict of interest.
- Reporting suspected breaches of the Code of Conduct.

1. HONESTY AND INTEGRITY

All SunWater employees will demonstrate honesty and carry out their roles with integrity in order to earn and maintain the trust and respect of other employees, colleagues, customers and members of the public. We all have a responsibility to carry out our roles to the best of our ability, maintain and enhance SunWater's reputation 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 principals 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 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 their 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. However, employees may accept gifts of nominal value (less than \$50) such as promotional products. For acceptance of gifts in excess of this value, the Gifts and Benefits Policy applies.

Note: Procurement officers must report **all** gifts and benefits received, regardless of the value.

External/Secondary Employment

Generally employees can engage in secondary employment (including voluntary work) external to 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.

Written supervisor approval is required prior to engaging in external employment, and the following conditions must be met:-

- SunWater's resources including intellectual property are not being used in undertaking external employment.
- It does not involve work SunWater is currently undertaking.
- Work is not undertaken during 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?

This is even more important for employees engaged in decision-making processes. In some situations, resolution of the conflict may mean removing themselves from the decision-making process.

Examples of Behaviours that Breach this Principle:

- Working the night shift in a service station or 7-Eleven and coming to work without adequate sleep
- Accepting an invitation to a corporate golf day or corporate box tickets to the rugby without seeking approval and 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 information
- Cheating on your timesheet
- Covering up or not reporting environmental incidents/issues

2. WORKING SAFELY

No Harm – All Injuries are Preventable. SunWater believes this goal is achievable and is committed to ensuring the safety of employees, contractors, volunteers and any other visitors to SunWater premises and as a result of our business activities. This means all employees are responsible for putting safety first and ensuring they do not engage in any behaviour that may put themselves or others in danger. Employees must:-

- Identify and report/address workplace hazards and risks.
- Familiarise themselves with and **always** follow WH&S procedures.
- Remind other employees about following WH&S procedures and refuse to participate in activities where those procedures are not being followed.
- Report situations where WH&S procedures are not followed.
- Report all incidents and near misses.

Examples of Behaviours that Breach this Principle:

- Coming to work affected by drugs
- Drinking on the job outside authorised functions
- Not using personal protective equipment (PPE)
- Using fuel from unlabelled containers
- Speeding in SunWater vehicles
- Ignoring unsafe situations or practices in the workplace

3. PROPER USE OF SUNWATER RESOURCES

SunWater employees 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, SunWater employees 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.

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 employee's own time.
- Usage does not risk the safety of the employee or 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 operational SunWater activities or damage SunWater's image and/or reputation.
- Consumables are provided by the employee, for example paper, fuel etc.
- The usage must not incur a cost or an FBT liability for SunWater.

Examples of Behaviours that Breach this Principle:

- Tasking two people when only one is required
- Downloading, storing or distributing pornography on SunWater ICT equipment / networks
- Using SunWater resources to conduct personal business for personal gain or profit (eg. tools, lawn mowers, computers, printers etc)
- Storing or forwarding inappropriate jokes and graphics ie. those that may be perceived as sexually explicit, racist, defamatory or offensive

4. RESPECTING OTHERS & WORKING TOGETHER

All SunWater employees must treat other employees, colleagues, contractors, customers and members of the public with respect, fairness and courtesy. This means respecting and taking into account others' rights and views. Employees must ensure they:-

- Treat people courteously and with respect.
- Dress appropriately in the workplace in accordance with work location, role performed and client expectations; ensure that their appearance is neat and tidy and properly represents SunWater at all times.
- **Do not** unfairly discriminate against, defame or slander another person.
- **Do not** harass, bully or intentionally intimidate another person.

Examples of Behaviours that Breach this Principle:

- Purposefully excluding colleagues from meetings, gatherings, decision-making processes
- Yelling and/or swearing at customers or colleagues
- Displaying sexually explicit posters or other material that may offend colleagues
- Telling inappropriate jokes that may offend colleagues
- Supervisors not taking harassment complaints seriously and/or not ensuring natural justice

5. APPROPRIATE USE OF SUNWATER INFORMATION

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

- Share information openly, honestly and appropriately to assist SunWater to achieve business outcomes.
- Store information in accordance with SunWater's Records Management policy to ensure appropriate access, confidentiality and security of information.
- **Do not** disclose information outside SunWater unless delegated to do so.
- Maintain the privacy of personal information about customers, contractors, stakeholders, and employees ensuring it is only used for the legitimate, permitted purposes for which it was collected.
- **Do not** make any public comments about SunWater unless specifically authorised to do so.
- If authorised to make public comment, ensuring it is consistent with SunWater's official view and does not have the potential to impact negatively on SunWater's business.
- **Do not** release information for which SunWater holds intellectual property rights e.g. SunWater reports, maps or software to external parties without seeking prior approval.
- **Do not** reproduce third party materials without appropriate attribution or a written licence or permission. This may represent a breach of copyright laws.
- **Do not** use intellectual property not belonging to SunWater, unless authorised by the owner to do so.

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 an employee's personal contact details
- Speaking negatively about SunWater to customers or members of the public

BREACHES OF THE CODE OF CONDUCT

Reporting Breaches

SunWater is committed to an open, accountable workplace where employees may, in good faith, raise concerns about suspected misconduct without fear of unfair treatment.

SunWater expects any employee who suspects misconduct to report it to their immediate supervisor. If, due to the circumstances, this is inappropriate or impractical, employees should contact:-

- The relevant Senior Manager or General Manager;
- The Manager, Human Resources;
- The Chief Executive Officer; or
- The Manager, Internal Audit.

Where it is reasonably suspected that serious misconduct has occurred or a criminal offence has been committed, the matter may be referred to the SunWater Accountability Referral Committee.

For employees reporting suspected serious misconduct ie. conduct that may constitute a summary or indictable offence, SunWater will ensure confidentiality in relation to information disclosure and act to ensure employees are protected from reprisal action arising from making such reports.

Consequences of Misconduct

Misconduct may lead to disciplinary action being taken against an employee which can include termination of employment.

OTHER MATTERS

Related SunWater Policies and Standards

SunWater has a range of policies and standards that expand on the requirements specified in this Code of Conduct. Some of those policies are listed below and are available on the SunWater intranet. Employees are responsible for familiarising themselves with these policies and any others that are relevant for their roles.

- Acceptable Use of ICT Facilities and Devices
- Compliance Strategy and Policy
- Email Usage Guide
- Environmental Management Standards and Policies
- Financial and HRM Delegations
- Fraud Standard
- Gifts and Benefits Policy and Guide
- Information Asset Classification & Control Policy
- Information Privacy Policy
- Intellectual Property Policy
- Media Policy
- Misconduct and Discipline Policy and Guide



- Purchasing Policy and Guide
- Records Management Policy
- Recruitment and Selection Policy and Guide
- Style and Etiquette Guide
- Use of SunWater Motor Vehicles
- Use of Taxi Services Policies
- Workplace Harassment Policy and Guide
- WH&S Standards

Conflicts Between Codes Of Conduct

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

Criminal Offences

If a SunWater employee 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 employee, which may include termination of employment.

CODE OF CONDUCT REVIEWS AND UPDATES

Human Resources is responsible for the Code of Conduct. If you believe the Code of Conduct should be modified, updated or extended, please contact the Human Resources Manager on (07) 3120 0038.

A handwritten signature in black ink, appearing to be "M. J. ...", is written over a horizontal line.