

1. Purpose

Sunwater's Code of Conduct forms the basis of how we work together every day to live our Values: Value People, Work Together and Take Responsibility for the benefit of all customers, stakeholders and people. Our Code:

- provides clarity on the required standard of actions, behaviours and conduct that we expect;
- promotes fair, ethical, legal and objective decision-making; and
- supports our reputation with customers and our stakeholders.

This Code does not form part of any contract of employment and Sunwater may, at its absolute discretion and from time to time, amend, withdraw, replace or depart from the Code. This Code must not be distributed outside of Sunwater, without written consent from the General Manager, People and Change at Sunwater.

2. Scope

This Code of Conduct applies to anyone working at Sunwater: employees, contractors, consultants and volunteers. 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 to out of hours conduct which has a relevant connection to an employee's employment with Sunwater.

3. Reporting Non-Compliance

Sunwater is committed to an open and accountable workplace where everyone 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 person 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 Chief People Officer
- the Chief Executive Officer
- the Sunwater Whistleblower Hotline which can be contacted through 1800 298 497 (toll free) or via the independent whistleblower provider's website (PKF Integrity Services) <https://www.pkftalkintegrity.com/?SUN> or Email: Sunwaterdisclosures@pkf.com.au.

Suspected misconduct or breaches of the Code of Conduct should be reported in line with the Sunwater Grievance Procedure. Suspected corrupt conduct should be reported in line with the Sunwater Fraud and Corrupt Conduct Procedure.

4. Consequences of Non-Compliance

Where breaches of this Code are established, the matter will be dealt with under the relevant policy or procedure.

There are a range of disciplinary consequences (including termination of employment) for employees who are found to have breached this Code.

5. Policy Statement

Adhering to this Code is a condition of working at Sunwater. The Code of Conduct expands on the Sunwater Values and provides clarity on what behaviours and actions are expected. It explains how we can ensure we are meeting these standards. In addition to the below expectations, Sunwater does not tolerate any form of violence, abusive language, harassment (including sexual and sex-based harassment), bullying, discrimination, victimisation or vilification.

5.1. Value People

- We put our safety and that of others first.
- We are fit for work when on duty and use Sunwater's tools and processes to mitigate our risks.
- We monitor others to make sure they are also fit for work and feel empowered to speak up when concerned.
- We behave professionally and with honesty, integrity and treat others with respect.
- We work to the best of our ability and have the courage to do the right thing.
- We comply with laws, enterprise agreements, policies, procedures and management guidelines and frameworks.

In order to comply with this, we:

- Put our own safety and that of others first. Follow and promote all safety procedures, policies and legal requirements.
- Are fit for work. Advise your immediate supervisor if you or if you suspect that a co-worker is unfit for work.
- Disclose any conditions (physical or psychological) including any use of medications, alcohol, drugs (legal or illegal) which may impact your safety or fitness for work.
- Safely intervene if a co-worker is not working safely or is in danger, whether they are an employee or contractor.
- Refrain from conduct that could adversely affect workplace performance and behaviour or put anyone's health and safety at risk. This includes the misuse of illegal or controlled drugs and the consumption of alcohol. Please see Sunwater's Drug and Alcohol Procedure for further details.
- Always report near misses, safety breaches, hazards and incidents to supervisors for investigation and action.
- Treat others fairly, courteously, with empathy and respect for the privacy and dignity of every person.
- Use language that is positive, respectful and constructive.
- Make selection decisions in accordance with the principles of merit and equity.
- Have sound reasons and appropriate documentation to support decisions and actions.
- Ensure our behaviours and interactions are free from violence, abusive language, harassment (including sexual and sex-based harassment), bullying, discrimination, victimisation and vilification. Please see Sunwater's Bullying, Harassment and Discrimination Procedure for further details.
- Ensure conduct does not result in a workplace environment that is hostile on the ground of sex and gender.
- Carry out lawful, safe and reasonable directions from managers and supervisors.
- Follow business rules, policies and procedures.
- Comply with and keep up to date with the law, enterprise agreements, policies and management guidelines and frameworks, including those specifically required for our trade or role.

5.2. Work Together

- We are proud to represent Sunwater.
- We know our services and products.

- We seek opportunities to understand our customers' needs and how Sunwater adds value to their business.
- We are open and transparent in order to maintain good working relationships. We work with our team and with customers always in mind.
- We seek to understand and work constructively to resolve problems.

In order to comply with this, we:

- Create and maintain positive work relationships.
- Respond to attempted communication in a reasonable time frame
- Use questions to listen, understand and respond.
- Seek proactive solutions.
- Engage with our customers on how to create shared value.
- Are receptive to feedback and respond with action.
- Collaborate with each other and our customers to provide proactive solutions.
- Act consistently with the Code in all our interactions – at work and work-related activities (including those outside of work hours).
- Behave professionally adhering to our three (3) core Values when at work and representing Sunwater.
- Refrain from making any public comments about Sunwater unless authorised to do so.

5.3. Take Responsibility

- We deliver on our promises.
- We act responsibly and take accountability for our actions and decisions.
- We challenge our thinking to create innovation and value.
- We seek information and take an active role to support ourselves and our colleagues through change.
- We seek opportunities for improvement and act on them.
- We manage real or perceived conflicts of interest.
- We protect all private, confidential or sensitive information.
- We use our systems, equipment, property and tools appropriately.

In order to comply with this, we:

- Proactively look for solutions and outcomes that drive value.
- Promptly and fully disclose any actual, potential or perceived conflict of interest and get written permission from your supervisor and ensure conflicts are effectively managed to ensure the integrity and transparency of Sunwater's decision making.
- Align our work expectations with customers' needs.
- Seek feedback and development from supervisors.
- Work with due care and attention with a commitment to producing quality outcomes
- Take personal accountability for work outcomes and commitments to customers (internal and external).
- 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.
- Share information openly, honestly and appropriately to assist Sunwater to achieve business outcomes.
- Use Sunwater resources, effectively, efficiently and economically
- Store information appropriately to ensure appropriate access, confidentiality and security of information.
- Seek authorisation before disclosing confidential information or Sunwater intellectual property (Sunwater reports, maps or software).

- 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.
- Discourage gifts and benefits and report any gifts in the Gift and Benefits Register form.
- Report any suspected bribe immediately to the CEO or Company Secretary.
- Ensure we always act with honesty and integrity to prevent fraud, including reporting any suspected fraud activities.

6. Media and social media usage

Sunwater's profile in the media and on social media has a material effect on Sunwater's reputation. An employee's ability to express their views in a public forum comes with the responsibility to ensure the expression of those views does not breach Sunwater's policies, any applicable laws or other legal obligations.

In particular, employees must not:

- post or make any comment or statement which is unlawful or which otherwise constitutes bullying, discrimination, harassment (including sexual harassment and sex-based harassment), victimization or vilification. See Sunwater's Bullying, Discrimination and Harassment Procedure for further details;
- disclose confidential information belonging to or about Sunwater, its people or its business;
- disclose confidential information belonging to Sunwater or information which employees reasonably ought to have known is confidential that they become aware of in the course of their work at Sunwater;
- post inflammatory material or engage in content that could bring Sunwater into disrepute. Comments that might bring Sunwater into disrepute include, but are not limited to:
 - any comment that may not be in the best interests of protecting Sunwater's relationships with stakeholders;
 - comments that are not consistent with the Sunwater's values; and
 - comments where employee's may be taken to be representing Sunwater that might contradict or be inconsistent with a stated position of Sunwater;
- imply Sunwater's endorsement of an employee's personal views;
- use the Sunwater's IT systems, premises or other visual markers where employees are acting outside their professional capacity; and
- purport to speak on behalf of Sunwater unless authorised to do so.

Employees should comply with these principles even on social media channels that they may believe to be personal and private (such as WhatsApp, Snapchat or in other private messaging functions) given the potential for content to be accessed by hackers or otherwise spread more widely.

Social media accounts set up by individuals are the responsibility of those individuals and the views expressed are not those of Sunwater. However, it is always possible for individual accounts to be associated with an individual's position at Sunwater. Sunwater expects a common sense approach to commentary, with the overriding goal being to protect the reputation of Sunwater, its employees and its stakeholders. When using social media, employees must comply with the general principles outlined above.

7. Responsibilities

Role	Responsible For
Sunwater Board	<ul style="list-style-type: none"> • Approve the Code of Conduct, ensuring alignment with government policies, shareholder expectations and organisational values

	<ul style="list-style-type: none"> • Provide oversight to ensure the Code remains current, effective and reflective of emerging issues and changing policy environments • Periodically review and evaluate the Code’s ongoing relevance and effectiveness. • Role model and adhere to the standards reflected in the Code
Chief Executive Officer	<ul style="list-style-type: none"> • Personally role model and ensure that leaders and teams act in accordance with the Code and positively promote its values and behaviours to support Sunwaters’ services • Implement policies that support compliance with the Code • Monitor organisational adherence and escalate issues as needed to the Board
Executive Leadership Team	<ul style="list-style-type: none"> • Lead by example by embodying and promoting the values and behaviours of the Code • Provide the appropriate resources to ensure the Code can be applied and complied with by all team members • Ensure their teams understand and comply with the Code, policies, procedures, standards and legislation requirements • Identify and address compliance issues, including reporting and escalation requirements • Conduct periodic reviews of performance to ensure consistent application of the Code, contributing to continuous improvement and Sunwaters’ service commitments
Sunwater Line Leaders and Managers	<ul style="list-style-type: none"> • Ensure all individuals have access to and understand the Sunwater Code of Conduct, relevant Sunwater policies, procedures, standards and legislation impacting their role • Act 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 • Report and address any breaches or suspected breaches of the Code of Conduct
Employees and other workplace participants	<ul style="list-style-type: none"> • Understand and comply with the Code of Conduct • Live our Values • Challenge conduct and thinking that is inconsistent with this Code • Declare and resolve any perceived, potential or actual conflict of interest • Report suspected breaches of the Code of Conduct to their immediate supervisor • Complete all training as directed • If, due to the circumstances, this is inappropriate or impractical, individuals may contact either: <ul style="list-style-type: none"> ○ the relevant Senior Manager, General Manager or Executive ○ the Chief People Officer ○ the Chief Executive Officer ○ the Sunwater Whistleblower Hotline

8. Reporting

The Chief People Officer shall be responsible for the reporting of breaches to the Sunwater Board.

9. Related Legislation and Documents

- [Conflict of Interest Procedure](#)
- [Public Interest Disclosure and Whistleblower Policy](#)
- [Gift and Benefits Procedure](#)
- [Fraud and Corrupt conduct Procedure](#)
- [Misconduct and Discipline Guideline](#)
- [Grievance Procedure](#)
- [Recruitment and Selection Procedure](#)
- [Drug and Alcohol Procedure](#)

- [Bullying, Discrimination and Harassment Procedure](#)

10. Creation, Review and Approval

Owner	Chief People Officer	Effective Date	February 2026
eDMS	4199625	Next Review Date	February 2027