

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
- Supports our reputation with customers and our stakeholders

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 outside working hours as it is important that individuals consider how their behaviour will reflect on Sunwater.

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.

Consequences of Non-Compliance

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

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

3. Policy Statement

Provides Sunwater's direction and purpose by establishing a clear and concise statement of Sunwater's Adhering to the Code of Conduct 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, workplace and/or sexual harassment, bullying and discrimination.

3.1. 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.
- 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, workplace and sexual harassment, bullying and discrimination.
- 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.

3.2. 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 customer 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.
- 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.

3.3. 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.
- 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.
- 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.



4. Responsibilities

Role	Responsible For
All Employees, Contractors, Consultants, Volunteers	<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 potential or actual conflict of interest Report suspected breaches of the Code of Conduct to their immediate supervisor Complete on-line training on induction and refresh this training every two years 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
Sunwater Leaders	<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

5. Reporting

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

6. Related Legislation and Documents

- Conflict of Interest Policy and Procedure
- Public Interest Disclosure and Whistleblower Policy and Procedure
- Gift and Benefits Procedure
- Fraud Corrupt Conduct Policy and Procedure
- Misconduct and Discipline Policy and Guide
- Recruitment and Selection Policy and Guide

7. Approval and Review Details

Owner:	GM People & Change	Issue Date:	July 2022	Document No:	2451120-v4
SME:	Chief People Officer	Next Revision Date:	July 2024	Reference No:	CORP POL 01

