

COMPLIANCE MANAGEMENT POLICY



PURPOSE

This policy articulates Energy Queensland Limited's (Energy Queensland) expectations for compliance across Energy Queensland and its subsidiaries (the EQL Group). This policy is fundamental to Energy Queensland being a safe, successful and sustainable organisation.

Scope

The EQL Group is subject to a wide range of legal, regulatory and governance requirements, as well as best practice standards, ethics and community expectations. This policy covers all EQL Group's compliance obligations, including:

- legislative obligations, including State and Commonwealth Acts, Regulations, local laws, by-laws, planning schemes and rules
- permits, licences, approvals and other authorisations
- contractual obligations
- regulatory policies, guidelines (such as the Australian Energy Regulator's Electricity Distribution Ring-Fencing Guideline) and codes
- industry codes and standards
- shareholding Minister and other State and Commonwealth government requirements
- Energy Queensland's policies, procedures, Code of Conduct, strategies, plans and delegations.

This policy applies across the EQL Group to directors, officers, employees, contractors and service providers (where applicable) and any other person notified that this policy applies to them.

POLICY STATEMENT

Energy Queensland is committed to having an effective compliance management framework and an enterprise-wide culture of good corporate governance, ethics, integrity and compliance. Compliance across the EQL Group is achieved by actively fostering continuous improvement in our compliance performance, supported by effective, sustainable systems, processes and tools.

All EQL Group personnel are required to:

- take personal responsibility and accountability for satisfying compliance obligations in their day-to-day activities; and
- contribute to a positive and proactive compliance culture of best practice governance, ethics and integrity.

Compliance is supported and encouraged across all levels of the EQL Group. Compliance is integrated across all business functions and day-to-day operations. Compliance issues, compliance risks and non-compliances are communicated early and transparently. External reporting of non-compliances is performed within required timeframes.

IMPLEMENTATION

Principles

Energy Queensland's compliance management is based on the following principles:

1. Leadership

Leadership at all levels demonstrating a commitment to, and promotion of, integrity, ethics and compliant behaviour; compliance is supported and encouraged across all levels of the organisation.

2. Awareness

Compliance obligations are identified; compliance risks evaluated; compliance issues and compliance risks are addressed through sustainable, effective controls.

3. Integration

Compliance management is integrated across all business functions and day-to-day operations through effective controls such as systems, processes, tools, education and awareness-raising activities.

4. Evaluation

Adequacy, effectiveness and efficiency of controls are evaluated and improved (where necessary); compliance issues, compliance risks and non-compliances are managed, analysed and reported early and transparently; compliance performance measured and improved (where necessary).

Governance and accountability

Compliance is everyone's responsibility. Energy Queensland expects all directors, officers, employees, contractors and service providers across the EQL Group to:

- be aware of and adhere to this policy, other policies and procedures relating to their workplace activities and compliance obligations
- act in accordance with the Code of Conduct and perform their duties in an ethical, lawful and safe manner
- satisfy all compliance obligations in their day-to-day activities
- contribute to the EQL Group's positive compliance culture
- integrate compliance management into their day-to-day activities
- undertake training and education to support compliance
- pro-actively communicate, report internally and externally (if required) and escalate all compliance issues, compliance risks and non-compliances as appropriate.

Compliance issues, compliance risks and non-compliances should be assessed using the EQL Risk Evaluation Matrix and escalated in accordance with the Enterprise Risk Management Standard R271 - 689958. Any compliance issues, compliance risks and non-compliances with a High or Extreme risk level should also be reported to the General Manager Risk and Organisational Resilience.

Specific compliance responsibilities are set out in the table in **Annexure A**.

EXTERNAL REFERENCES

The following document applies to this Policy:

AS ISO 37301:2023 Compliance management systems – *Requirements with guidance for use*

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REFERENCE DOCUMENTS

This Policy should be read in conjunction with the following documents:

Audit and Risk Committee Charter R260 - 691699

Compliance Management Guide R308 - 690216

Director Code of Conduct Policy P001 - 687212

Employee Code of Conduct Policy P004 - 691422

Enterprise Risk Management Standard R271 - 689958

EQL Risk Appetite Q015 - 691603

Risk Evaluation Matrix R056 - 691861

Risk Management Policy P043 - 690750

DEFINITIONS

In this Policy and any related documents:

Term	Definition
Compliance	Outcome of the EQL Group meeting all compliance obligations
Compliance Management	A process by which Management plans, organises, controls and leads activities that ensure compliance with compliance obligations. Compliance management is supported by effective, sustainable systems, policies, procedures and tools to ensure compliance obligations are met and that the EQL Group appropriately responds to any compliance issue, compliance risk or non-compliance
Compliance issue	Any concern, event or incident relating to a compliance obligation
Compliance obligations	Requirements the EQL Group either must comply with (such as legislative obligations and licence conditions or chooses to comply with (such as industry codes and standards)
Compliance risk	Likelihood of occurrence and the consequences of non-compliance with compliance obligations
Compliance culture	Values, ethics, beliefs and behaviours that create and support compliance across the EQL Group
Non-compliance	A failure to meet compliance obligations

ENFORCEMENT

The EQL Group will not tolerate breaches of this Policy. Any instances of non-compliance with this Policy will be investigated and appropriate action taken. A breach of this Policy may also constitute a breach of other EQL Group policies and procedures and should be reported to your line manager (i.e. direct supervisor, workgroup manager or the Chief Executive

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Officer) or where this is not appropriate, to your manager once removed. Breaches are also to be reported to the person responsible for managing enquiries regarding this Policy.

Non-compliance with this Policy may result in disciplinary action, including termination of employment.

VARIATION

This Policy is not intended to detract from, or add to, any rights held by a person covered by this Policy under a contract of employment or enterprise agreement. Subject to any consultation obligations, Energy Queensland may vary, add to, withdraw, or replace this Policy, at its discretion, at any time.

This Policy should be reviewed at least every two years.

This Policy may only be varied by the Board or appropriately delegated Board sub-committee. The CEO or the Company Secretary can approve administrative changes to Board approved policies (i.e. minor updates, amendments or corrections not involving changes to delegations or the provisions of the policy).

Administrative changes to this Policy were noted by the Audit and Risk Committee on 5 September 2024.

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ANNEXURE A – ROLES & RESPONSIBILITIES

The table below sets out specific roles and responsibilities for ensuring this Policy is implemented. These responsibilities are in addition to those that apply to everyone as set out in the Policy.

Role/Position	Responsibility
EQL Board	Oversee and monitor compliance.
Audit and Risk Committee	Assist the EQL Board in fulfilling its compliance oversight responsibility, as articulated in the Audit and Risk Committee Charter.
CEO	Accountable to the EQL Board for ensuring EQL's compliance. This includes: <ul style="list-style-type: none">• Supporting and encouraging proactive, transparent and accountable compliance management;• Promoting a positive compliance culture within the EQL Group; and• Requiring everyone across the EQL Group to carry out their duties in an ethical and responsible manner, protecting the community interest and the organisation's integrity.
Company Secretary	Appointing and retaining an adequately resourced and skilled Enterprise Compliance Team that has the authority and capacity to act independently.
Executive General Managers	Each Executive General Manager is: <ul style="list-style-type: none">• Accountable to the CEO for compliance obligations for which they are responsible (both within their Divisions and across the EQL Group);• Responsible for overseeing the proactive management of those compliance obligations for which they are responsible, the ongoing identification, assessment, management, reporting internally and externally (if required), review and monitoring of compliance issues, compliance risks and non-compliances; and• Responsible for ensuring adherence to this Policy and providing periodic compliance certification.
General Manager Risk and Organisational Resilience	Accountable for: <ul style="list-style-type: none">• Implementation, review and management of the EQL Group's compliance management framework; and• Reporting on compliance issues, compliance risks and non-compliances directly to the Executive General Managers, the CEO, the Audit and Risk Committee and the relevant subsidiary Boards as required. Has the support of the CEO to access: <ul style="list-style-type: none">• all levels of the EQL Group, including direct access to the Chair of the Board, Board, Audit and Risk Committee, CEO, Executive General Managers and General Managers;

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Role/Position	Responsibility
	<ul style="list-style-type: none">• all documented information and data needed to support compliance management; and• expert advice on relevant laws, regulations, codes and standards (as required).
General Managers, Managers and Supervisors	<p>Responsible for:</p> <ul style="list-style-type: none">• Ensuring identification of compliance obligations, compliance issues, compliance risks and non-compliances;• Implementation and maintenance of effective compliance controls and/or processes; and• Adherence to this Policy and associated procedures, systems and guidelines (including reporting of compliance issues, compliance risks and non-compliances). <p>Encouraged to identify and raise areas of concern and/or improvement with the General Manager Risk and Organisational Resilience.</p>