

PURPOSE

The purpose of this policy and any related documents is to set the standards expected of all persons working for the EQL Group and to provide information to assist in the understanding of the ethical values and the personal standards of behaviour expected. Adherence to these principles is fundamental to the reputation of the EQL Group and building a partnership of trust between the EQL Group and its stakeholders.

Scope

This policy applies to the EQL Group, Group personnel, as well as contractors and any other personnel notified that this policy applies to them. This policy is intended to apply to a secondee to Energy Queensland Limited (EQL).

POLICY STATEMENT

It is a fundamental principle of the EQL Group that all its business affairs should be conducted legally, ethically and with strict observance of the highest standards of integrity and propriety. The EQL Group Code of Conduct is based on this principle.

This Code provides, amongst other things, that we act with honesty, integrity and transparency, as this cultivates the trust of our customers, colleagues and the community.

IMPLEMENTATION

Governance and accountability

Specific roles and responsibilities for ensuring this Policy is implemented are set out in the table in Annexure A.

To everyone working with Energy Queensland Limited from the Chief Executive Officer through all levels in the organisation, we are all equal when it comes to observing this Code. If you are unsure of any particular aspect of the Code, you should discuss this with your manager.

There is a separate Code of Conduct policy for Directors of Energy Queensland Limited.

EXTERNAL REFERENCES

Crime and Corruption Act 2001 (Qld)
Fair Work Act 2009 (Cth)
Fair Work Regulations 2009 (Cth)
Anti-Discrimination Act 1991 (Qld)
Sex Discrimination Act 1984 (Qld)
Work Health and Safety Act 2011 (Qld)
Privacy Act 1988 (Cth)

REFERENCE DOCUMENTS

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

Code of Conduct (Annexure A)
Confidential Information Policy P034 - 691791
Diversity and Inclusion Policy P016 - 690058
Employee Conflicts of Interest Policy P005 - 692221

EMPLOYEE CODE OF CONDUCT POLICY

Employee Entertainment, Hospitality and Gifts Policy P006 - 687216

Environmental Sustainability and Cultural Heritage Policy P058 - 691101

Fraud and Corruption Prevention Policy P017 - 681818

Governance and Delegations Policy P013 - 691426

Health and Safety Policy P009 - 692225

Information Security Policy P028 - 690070

Investigation and Discipline R034 - 691276

Out of Hours Conduct Policy P007 - 691081

Performance Improvement R033 - 690148

Personal and Intellectual Property Policy P055 - 690415

Prevention of Discrimination, Bullying and Harassment Policy P030 - 691089

Prevention of Sexual Harassment Policy P020 - 690066

Privacy Policy P040 - 691438

Social Media Guideline R145 - 690965

Use of Systems Policy - 21740778

Please note there are other policies that are specific to particular roles and/or risks.

Please speak to your leader or supervisor to clarify which policies relate to your role at the EQL Group.

DEFINITIONS

In this policy and any related documents,

Term	Definition
Board	The board of directors of Energy Queensland Limited
Code	The EQL Group Code of Conduct
EQL Group	Energy Queensland Limited and its subsidiaries
This policy	This policy and any related documents

ENFORCEMENT

The EQL Group Code of Conduct sets down standards of behaviour. Consequences for breaching the Code will vary depending on the extent of the breach, with every breach assessed on a case-by-case basis. In the most serious circumstances, breaches could result in dismissal and where required, notification to the Crime and Corruption Commission and/or the Police for investigation. Less serious breaches may be dealt with by disciplinary processes, relevant warnings or otherwise.

In addition, in relevant cases Energy Queensland Limited has an obligation under its Fraud and Corruption Prevention Policy to notify appropriate authorities such as the Crime and Corruption Commission.

If you believe that another person is breaching the EQL Group Code of Conduct, you are encouraged to notify Energy Queensland Limited. Reports can be made in the most suitable way – such as to line management i.e. direct supervisor, workgroup manager, the Chief Executive Officer, HR or the Integrity Hotline.

EMPLOYEE CODE OF CONDUCT POLICY

Once notified, all matters should be kept confidential by the persons involved, including any complainant, except as required or authorised by law or to enforce legal rights.

Energy Queensland Limited does not tolerate victimisation or reprisals against persons who report suspected breach of this policy.

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 Limited 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).

ANNEXURE A – CODE OF CONDUCT

Energy Queensland Group Code of Conduct

The EQL Group Code of Conduct is designed to guide how we all conduct ourselves at work.

It sets the minimum standard of behaviour that our customers and shareholders expect of us, and that we should expect of each other.

It provides these standards to help us make the right choices.

The Code also helps the EQL Group provide a safe, healthy and productive work environment, where employees, contractors and visitors feel respected and supported.

This Code applies to the EQL Group, Group personnel, as well as contractors and any other personnel notified that this policy applies to them. This Code is intended to apply to a secondee to Energy Queensland Limited (EQL).

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

It is expected that all employees and contractors will comply with the below:

1. Energy Queensland's Values

At the heart of our organisation, our people are central to our workplace culture.

Our values, known as *What matters most to us*, are more than just words. They reflect the principles for how we want our people to work each and every day, together with one another, and alongside the customers and communities we serve.

What's most important is that *What matters most to us* is embodied in how we conduct ourselves each and every day.

Our *What matters most to us* is supported by our core behaviours. These behaviours provide a guide of what the values look like when we are behaving in a values-aligned way.

- **We're safe** – We prioritise the physical safety and mental wellbeing of our people, customers, and communities.
- **We belong** – We embrace diversity, empower all to excel, and unite to become stronger together.
- **We grow** – We foster both personal growth for collective success and innovation to build Queensland's energy future.
- **We deliver** – We deliver on personal commitments to build our shared achievements.

2. Discrimination, Bullying and Harassment

Everyone in the workplace has a responsibility to ensure discrimination, bullying and harassment does not occur. Without exception, everyone is expected to behave in ways that are safe, respectful and inclusive.

The EQL Group has implemented the Prevention of Discrimination, Bullying and Harassment Policy P030 - 691089 that all employees must comply with.

3. Sexual Harassment

Everyone in the workplace has a responsibility to ensure sexual harassment does not occur. Without exception, everyone is expected to behave in ways that are safe, respectful and inclusive.

Energy Queensland Limited has implemented the Prevention of Sexual Harassment Policy P020 - 690066 that all employees must comply with.

4. Appropriate Workplace Behaviour

Everyone in the workplace has a responsibility to ensure inappropriate workplace behaviour does not occur. Without exception, everyone is expected to behave in ways that are safe, respectful and inclusive.

In addition to an obligation to comply with the Prevention of Discrimination, Bullying and Harassment Policy P030 - 691089 and the Prevention of Sexual Harassment Policy P020 - 690066, everyone must ensure they behave appropriately at work.

Whilst behaviour may not constitute discrimination, bullying, harassment or sexual harassment, it may still be inappropriate behaviour for the workplace and will not be tolerated. Examples of inappropriate workplace behaviour include but are not limited to the following:

- Abusive, insulting or offensive language or snide comments or jibes which humiliate
- Unjustified criticism or complaints
- Undermining, white-anting or victimising someone
- Continuous and/or deliberate exclusion from workplace activities
- Withholding information vital for effective work performance
- Setting unreasonable timeframes or constantly changing deadlines
- Setting tasks unreasonably below or beyond a person's skill level
- Denying access to information, supervision, consultation or resources
- Spreading misinformation or malicious rumours
- Excessive scrutiny at work
- Communication that is aggressive, passive aggressive, abusive or intimidating

5. Comply with the law and Energy Queensland Group policies

5.1. The law

No one at the EQL Group should be directed or expected to carry out an illegal or unlawful act. All employees are required to comply with applicable laws and legal responsibilities.

Energy Queensland Limited also has a responsibility to report and act on any illegal acts and is obliged to fully co-operate with investigations by law enforcement or regulatory authorities. If we fail to comply with laws and regulations both Energy Queensland Limited and individual employees may face criminal sanctions or other serious consequences.

5.2. Our policies

There are a number of documented obligations, including this Code that applies to all employees. We must comply with these obligations and they are referenced in the Section 4 of this Policy. While your leader or supervisor is responsible for ensuring that you are aware of these policies, you also have a responsibility to comply with them. If you do not understand the policies, then contact your leader or supervisor.

There are also policies and procedures applicable to different roles at the EQL Group. We must comply with relevant role-related policies and procedures. While your leader or supervisor is responsible for ensuring that you understand these, you also have a responsibility for making yourself aware of them.

6. Maintain professional behaviour

At all times everyone must act in a safe, professional and ethical manner. Some examples of ways to maintain professionalism include:

- Behaving appropriately at work and work-related social functions.
- Being accountable for your decisions and actions.
- Keeping your skills and knowledge up-to-date so that we can achieve excellence in our roles. The EQL Group supports the development of its employees through training plans (speak to your supervisor / manager for more information).
- Not participating in business activity outside of your employment or role with the EQL Group if it impacts on your ability to work ethically or creates a conflict of interest that cannot be managed or removed.
- Appropriately reporting gifts offered in the course of our duties, that we may accept, and not accepting those which might influence, or be seen to influence, our ethical business judgement.
- Abiding by the principles of Social Media Guideline when using Workplace or personal social media.
- Ensuring that conduct which occurs outside of the workplace does not negatively impact upon the EQL Group.

7. Honesty and integrity

At all times everyone must act with honesty, integrity and transparency, as this cultivates the trust of our customers, colleagues and the community.

Some examples of ways in which we act with honesty and integrity include:

- Not engaging in any fraud, corruption, unethical or improper practices or irregular transactions.
- Not using false representations or deception to avoid an obligation or to gain an unjust advantage.
- Not misusing your position or authority to take part in activities that could cause loss to the EQL Group, its customers, suppliers or the community.
- Consulting with stakeholders and communicating business decisions, as much as is practicable.

8. Respecting Energy Queensland Group assets and property

The EQL Group assets, including motor vehicles, goods, money, intellectual property (e.g. business sensitive work processes) or the services of others (including employees and contractors) must be used professionally and for the benefit of the EQL Group and our customers, and not for personal gain.

This includes, but is not limited to:

- telephones, computers, information and telecommunications systems and technology,
- business records,

- vehicles,
- credit cards, expense accounts or other similar accounts, and
- tools and equipment.

9. Confidentiality and use of information

We must respect the trust placed in us by our company, our customers, suppliers and other third parties. This means we must respect the confidential and sensitive nature of the information we become aware of during our employment with the EQL Group. If you are uncertain as to whether or not something is confidential, you should presume that it is.

We should also exercise care in relation to unauthorised disclosure of information, for example:

- Discussing sensitive or confidential work matters with family, friends or business associates, particularly with people who are not EQL Group employees (for example information that if made public, could damage Energy Queensland Limited's reputation).
- Taking care to ensure sensitive or confidential documents are reasonably safeguarded whether on EQL Group premises or otherwise (for example ensuring budget-related documents are filed away and not left 'open' on your desk for others to see).

Energy Queensland Limited has implemented the Confidential Information Policy, the Personal and Intellectual Property Policy and the Privacy Policy that all employees must comply with.

10. Use of Systems

Energy Queensland is committed to providing Systems and ICT to help employees perform their duties safely, effectively and efficiently.

Energy Queensland Limited has implemented the Use of Systems Policy - 21740778 which outlines the rights and responsibilities that applies to employees when using Energy Queensland Systems.

11. Responsibilities as a Government Owned Corporation

As a Government Owned Corporation, we operate in a commercially and politically sensitive environment. We are committed to the prevention of misconduct and to promoting a strong culture of corporate governance. This involves reporting reasonable suspicions of corrupt conduct as required by the *Crime and Corruption Act 2001* (Qld) or public interest disclosures under the *Public Interest Disclosure Act 2010* (Qld).

To protect the EQL Group's reputation and brand, as well as its commercial interests, only authorised material is to be communicated to the public, the media and other key stakeholders.

To ensure that consistent and accurate messages are publicly communicated, only a limited number of people are authorised to speak on behalf of the EQL Group. These spokespeople include members of the Board, members of the Executive Committee and any delegated roles in the relevant business units. Queries regarding approved media spokespeople should be directed to the General Counsel.

12. Conflict of Interest

Potential conflicts of interest can arise every day. To help recognise and deal with conflicts of interest appropriately, we must stay diligent. This means we should not participate in activities that cause a conflict of interest between our personal interests and our duties and obligations to Energy Queensland Limited.

Any situation potentially involving conflict of interest between an employee and Energy Queensland Limited should be avoided. However, any conflicts that cannot be avoided should be disclosed to Energy Queensland Limited in a timely manner and managed in accordance with the Employee Conflicts of Interest Policy P005 - 692221.

If you are unsure about potential conflicts of interest, speak to your supervisor or manager.

13. Community and Sustainability

13.1. Supporting the community

As a responsible corporate citizen, the EQL Group supports employee participation in professional associations, industry unions, charitable or service organisations and other community activities. The EQL Group also recognises that employees may from time to time wish to participate in political activity and / or serve in public office.

If you are unsure about your involvement in community or political activities, please speak to your supervisor or manager.

13.2. Commitment to sustainability

The EQL Group is committed to promoting and demonstrating sustainability by responsible environmental, social and economic practices in our operations. This means all employees are also responsible for maintaining and protecting the environment when carrying out their work duties. Employees should always consider the impact of their activities on the environment and the local community, including the way in which waste is disposed of, chemicals are used and stored, and natural resources are used.

Energy Queensland Limited has implemented the Environmental Sustainability and Cultural Heritage Policy which all employees must comply with.

14. Employee Responsibilities

Our standards are set by the Code and we will report breaches

This Code has the full support of the Board and the CEO and we take compliance with the Code very seriously.

You are encouraged to take the following steps if you observe behaviour or a situation that may be considered a breach of this Code, its supporting policies or the law:

‘Call it’. This means having a discussion with the person involved in the potential breach, so that the behaviour or situation can be quickly addressed.

If you do not feel comfortable having a discussion with those involved, potential breaches can also be reported to any of the following:

- your supervisor or manager;
- a member of the Executive Committee or the CEO directly;
- HR;
- The Integrity Hotline; or
- the General Counsel.

If you report a breach

You are required to keep the matter confidential, except as authorised by law or to enforce legal rights.

Be aware that the EQL Group does not tolerate bullying or the provision of false or misleading information used to bring someone into disrepute (i.e. those claims found to be unsubstantiated and made with the intention of causing detriment to another person).

In a similar manner, the EQL Group does not tolerate the victimisation of, or reprisals against, employees who report a potential breach. There are serious penalties under the *Crime and Corruption Act 2001* (Qld) for any person who threatens, intimidates or harasses (or attempts to do so) any person who gives evidence or helps the Crime and Corruption Commission in the performance of its functions. There are also penalties under the *Public Interest Disclosure Act 2010* (Qld) for anyone who commits a reprisal against a person who has made a public interest disclosure.

Energy Queensland Limited must inform its shareholding Ministers in a timely manner of any potential or actual breach of the Code of Conduct by Directors, the CEO, Senior Executives, and where material, by employees.

Consequences for breaching the Code

Consequences for breaching the Code will vary depending on the extent of the breach, with every breach assessed on a case-by-case basis. In the most serious circumstances, breaches could result in dismissal and where required, notification to the Crime and Corruption Commission and/or the Police for investigation. Less serious breaches may be dealt with by disciplinary processes, relevant warnings or otherwise.

15. Leaders and Supervisors Responsibilities

Leaders and supervisors have a responsibility to model and promote this Code, as managerial behaviour sets the tone for the conduct of all employees.

Leaders and supervisors have the ability to influence others by fostering an ethical environment and demonstrating this awareness in performing their duties and making decisions. It is important that leaders and supervisors lead by example.

Leaders and supervisors have a responsibility to ensure the EQL Group employees are aware of the Code, as well as the policies and procedures that apply to their roles. They also have a responsibility for ensuring that appropriate development and training is provided to allow employees to perform their duties.