

# EMPLOYEE CODE OF CONDUCT POLICY



## PURPOSE

The purpose of this policy and any related documents is to set the standards expected of all persons working with Energy Queensland Limited 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 Energy Queensland Limited and building a partnership of trust between Energy Queensland Limited and its stakeholders.

## POLICY STATEMENT

It is a fundamental principle of Energy Queensland Limited that all its business affairs should be conducted legally, ethically and with strict observance of the highest standards of integrity and propriety. The Energy Queensland Limited 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

### Application/Scope

This policy applies to Energy Queensland Limited employees, employees of subsidiaries or related bodies, as well as contractors (where applicable) and any other personnel notified that this policy applies to them. This policy is intended to apply to a secondees to Energy Queensland Limited. However, if an equivalent policy of the seconded employee's employer creates an enforceable right, this policy will apply to that employee only to the extent that it can operate consistently with the equivalent policy.

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.

## REFERENCES / RELATED DOCUMENTS

P017 Fraud and Corruption Prevention Policy

[Code of Conduct \(Annexure A\)](#)

## DEFINITIONS

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

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## ENFORCEMENT

The Energy Queensland Limited 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 Energy Queensland Limited 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 or the Chief Executive Officer.

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).

Minor amendments reviewed and approved by the Company Secretary on 21 December 2020.

## CATEGORY

Governance.

## 1. ANNEXURE A – CODE OF CONDUCT

### **Energy Queensland Limited Code of Conduct**

The Energy Queensland Limited 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 Energy Queensland Limited provide a safe, healthy and productive work environment, where employees, contractors and visitors feel respected and supported.

This Code applies to Energy Queensland Limited, employees and contractors (where applicable) and any other personnel notified that this policy applies to them. This Code is intended to apply to a secondee to Energy Queensland Limited. However, if an equivalent code of conduct or policy of the seconded employee's employer creates an enforceable right, this Code will apply to that employee only to the extent that it can operate consistently with the equivalent policy.

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.

### **A note for leaders and supervisors**

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 Energy Queensland Limited 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.

### **We comply with the law and Energy Queensland Limited policies**

#### **The law**

No-one at Energy Queensland Limited 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.

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## **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 Appendix. 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 Energy Queensland Limited. 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.

**Ask yourself this question:** have you read and understood the policies and procedures that relate to your role at Energy Queensland Limited?

**Example of a breach of the Code:** deciding not to report an illegal or unlawful act that you witnessed at an Energy Queensland Limited workplace.

## **We value and maintain our professionalism**

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

- Behaving appropriately at work or work-related social functions.
- Being accountable for our decisions and actions.
- Keeping our skills and knowledge up-to-date so that we can achieve excellence in our roles. Energy Queensland Limited 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 at Energy Queensland Limited 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.

**Ask yourself this question:** what are the gaps in my skills in knowledge that I could work on to improve my performance in my role at Energy Queensland Limited?

**Example of a breach of the Code:** attending a work-related social function and deriding a decision made by Energy Queensland Limited.

## **We act with honesty and integrity**

We 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 our position or authority to take part in activities that could cause loss to Energy Queensland Limited, its customers, suppliers or the community.
- Consulting with stakeholders and communicating business decisions, as much as is practicable.

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**Ask yourself this question:** if a decision you made at work was made public, could you stand by your decision and say you acted with honesty, integrity and transparency?

**Example of a breach of the Code:** keeping out-dated IT equipment and selling it privately, rather than returning to the relevant internal department for re-use or disposal.

Another example: completing, signing and submitting a timesheet, knowing that you have overstated your hours worked or overtime.

## **We work as one team**

Energy Queensland Limited is committed to providing equal employment opportunity, and a fair, safe and rewarding workplace.

As such, discrimination based on culture, race, colour, religion, gender, age, marital status, disability, association, powers or functions of a person's role, or other factors unrelated to a person's merit or Energy Queensland Limited's legitimate business interests, may be unlawful and will not be tolerated.

Behaviours such as sexual harassment or bullying will not be tolerated.

All people are entitled to their personal preferences in private or political matters. No pressure should be placed on anyone to influence those preferences and no approval or disapproval should be shown by anyone in their Energy Queensland Limited role, of anybody's private or political preferences or activities.

Organising or threatening to organise or take any action against another person with intent to coerce or mislead the other person, will not be tolerated.

**Ask yourself this question:** could the things that you and your friends consider 'appropriate' or 'funny' outside of work, offend those with whom you share a workplace?

**Example of a breach of the Code:** calling someone a nickname because you see it as a term of endearment or acceptance, even though they have asked you to stop.

Another example: excluding someone from team gatherings because you disapprove of their activities outside of work.

## **We respect Energy Queensland assets and property**

Energy Queensland Limited 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 Energy Queensland Limited 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.

**Ask yourself this question:** would you be comfortable sending an explicit, lewd, offensive or insulting email to your leader or the Chief Executive Officer? If the answer is

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no, then the email is inappropriate, and should not be sent to anyone at all over Energy Queensland Limited's email servers.

**Example of a breach of the Code:** using Energy Queensland Limited computers and devices (such as mobile phones) to view offensive and explicit material.

Another example: taking Energy Queensland Limited tools or office equipment, home to use over the weekend without appropriate workplace approval.

## **We respect confidentiality and do not misuse 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 Energy Queensland Limited. 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 Energy Queensland Limited 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 Energy Queensland Limited premises or otherwise (for example ensuring budget-related documents are filed away and not left 'open' on your desk for others to see).

**Ask yourself this question:** would you like your personal affairs to be shared with others? We should treat confidential business information with the same level of confidentiality and privacy as we do our own personal information.

**Example of a breach of the Code:** telling one supplier the value of a contract that Energy Queensland Limited awarded to another supplier.

Another example: knowing confidential details about a colleague, through the nature of your role, and sharing that information without their consent.

## **We acknowledge our responsibilities as a Government Owned Corporation and acknowledge the need for appropriate communications with media, government, public and other key stakeholders**

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 Energy Queensland Limited'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 Energy Queensland Limited's behalf. These spokespeople include members of the Board, members of the Executive



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Leadership Team and any delegated roles in the relevant business units. Queries regarding approved media spokespeople should be directed to the General Counsel.

**Ask yourself this question:** have you been given permission to speak on Energy Queensland Limited's behalf?

**Example of a breach of the Code:** making a comment to the media on Energy Queensland Limited's behalf, without permission, and expressing your own personal views which are contrary to the views of the company.

## **We manage conflicts of interest responsibly**

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.

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

**Ask yourself this question:** are your loyalties divided in coming to a professional and ethical decision?

**Example of a breach of the Code:** telling a customer which contracting company to use, knowing that the company you are recommending is owned by a relative of yours.

Another example: accepting tickets to an event from one of your suppliers, in return for the promise of ongoing Energy Queensland Limited business.

## **We support the community and we are committed to sustainability**

### **Supporting the community**

As a responsible corporate citizen, Energy Queensland Limited supports employee participation in professional associations, industry unions, charitable or service organisations and other community activities. Energy Queensland Limited 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.

### **Commitment to sustainability**

Energy Queensland Limited 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.

**Ask yourself this question:** are you cutting corners to save time at the expense of community or environmental safety?

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**Example of a breach of the Code:** printing out unnecessary and excessive volumes of printed documentation when email distribution would suffice.

Another example: finding a tap leaking on the floor and not reporting it to facilities management, thereby allowing wastage to continue while creating a safety risk for your colleagues.

## **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 Leadership Team or the CEO directly; 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 Energy Queensland Limited 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, Energy Queensland Limited 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.



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## Appendix

The following are key Energy Queensland Limited policies. All employees have a responsibility for making themselves aware of these policies:

### Policy Name

- Employee Conflicts of Interest Policy
- Fraud and Corruption Prevention Policy
- Privacy Policy
- Entertainment, Hospitality and Gifts Policy
- Environmental Sustainability and Cultural Heritage Policy
- Diversity and Inclusion Policy

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 Energy Queensland Limited.

If you believe that the Code of Conduct should be modified, please contact Human Resources.

Amendments to the Code of Conduct are to be approved by the Board (or by the specified Board delegate for administrative amendments).