

Code of Conduct

The purpose of our Code of Conduct is to ensure that South East Water fosters a harmonious, inclusive and positive environment. The Code is underpinned by our values and expects that we always act with dignity and respect. We have a proud history of delivering quality products and services to our customers and the community – this code establishes that we will achieve that by using our authority and responsibility professionally, fairly and with the highest level of integrity that is expected by our customers, stakeholders and regulators.

South East Water employees are bound by the *Code of Conduct for Victorian Public Sector Employees (VPS Code)*, the purpose of which is to promote adherence to the Victorian Public Sector Values (Integrity, Responsiveness, Impartiality, Accountability, Respect, Leadership, Human Rights). South East Water has developed its own Code of Conduct, together with supporting policies and procedures, to support the application of the VPS Code in South East Water's operating environment.

To ensure we conduct ourselves within applicable laws, standards and our values, our Code of Conduct is written as a set of general principles to assist us as we deliver on our purpose - To deliver healthy water for life for our customers, community and environment. Material that supports these principles is available on the intranet and within this Code of Conduct.

Our Code of Conduct provides a broad range of expected standards, but it can't address every situation. Therefore, when dealing with these situations, and to assist in deciding the right course of action, ask yourself the following:

- Is it legal?
- Am I proud of what I have done?
- Is it consistent with South East Water's values, policies and standards?
- Is it the right thing to do?
- Would it be viewed positively by our customers, the community and other stakeholders?
- Would a reasonable person think it is acceptable?
- Are my actions transparent?

If the answer to any of these questions is 'no', don't do it. If you are still unsure, seek advice.

What is the Code of Conduct?

Our Code of Conduct sets acceptable standards and expectations for the way we work at South East Water. It provides a practical set of principles to help you make decisions and it demonstrates acceptable and unacceptable behaviours, in your day-to-day work. Our Code of Conduct is linked to our corporate strategy, our vision (Innovate with purpose. Act with care.) and values (We put safety first, We're bold, We care, We're real, We discover and We deliver sustainably).

Who does the Code of Conduct apply to?

It applies to anyone who is employed by or works at South East Water, including employees (both permanent and temporary), fixed term workers and consultants who represent South East Water. We encourage our partners to adopt and maintain similar conduct and ethics principles to those outlined in our Code of Conduct.

When does the Code of Conduct apply?

It applies at any time you are identified as a representative of South East Water or where your behaviour has the potential to impact South East Water's reputation, workplace Safety or relationships and industrial relations, including outside your immediate workplace, remote work location or working hours. For example, at work functions, out of hours work activities or when you are out in the community on behalf of South East Water.

What will happen if I breach the Code of Conduct?

Failure to comply with the Code of Conduct or associated policies will be considered a serious matter and will be investigated by the relevant body. Breaches of our Code of Conduct or policies may result in disciplinary action, including termination of employment. All breaches of the Code of Conduct are required to be recorded and reported in line with South East Water procedures.

Who can support me in complying with the Code of Conduct?

If you need more information or are unsure of South East Water's expectations or your obligations, we encourage you to speak with your people leader or a member of the People Partnership team.

How does South East Water ensure the Code of Conduct is effective?

The Risk, Quality and Assurance team is responsible for ongoing review and development of the Code of Conduct. On commencement of employment and yearly, everyone who is employed by, or works at South East Water, completes a declaration, to show that they understand the Code of Conduct,



confirm that they have complied with it in the previous year and agree to comply with it in the future.

What must I do if I suspect a breach of the Code of Conduct?

You must immediately report all actual or suspected breaches of our Code of Conduct, the law, or policies to your people leader or the People Partnership team. Where you feel uncomfortable to report the actual or suspected breaches to these representatives for whatever reason (e.g.: the person is more senior than you, it involves these representatives), you may report actual or suspected breaches at any time under the Public Interest Disclosure Policy and Procedure where the conduct is dishonest, corrupt, fraudulent, illegal and unethical or any other type of reportable conduct.

Our Code of Conduct Principles

The seven Principles below set out expectations for how we conduct ourselves and our business. Each Principle includes, but is not limited to, a range of examples that bring these Principles to life.

We uphold a professional image, practice and reputation

South East Water's stakeholders, customers, partners and our own colleagues expect us to be accountable for our actions and behaviours and uphold our reputation. Therefore, you must:

- Undertake your duties with due diligence and care. Make decisions fairly, without bias and based on facts. You are accountable for your decisions and actions you take.
- Deal fairly, honestly, respectfully, impartially and in a timely manner with all colleagues, customers, suppliers and other third parties.
- Exercise your authorities in accordance with the Instrument of Delegation, including any relevant limits. You are responsible for understanding your authorities, accountable for how they are used and substantiating them.

- Behave in a way that takes into account our impact on the broader community and the environment in both the short and long term.
- Use all of our, partner and customer assets, including tangible, intellectual and electronic, as well as corporate credit cards, for proper legal and authorised purposes, and keep accurate and transparent records.
- Never participate in activities or functions in a way that may damage our reputation.
- Conduct yourself in an apolitical manner and avoid participation in political activity in the course of your work.
- Maintain a standard of dress which is neat, clean and appropriate for the type of work undertaken.

We act honestly, fairly and with integrity

Our success and standing are dependent on acting with honesty, fairness and integrity. Operating responsibly underpins everything we do. For that reason, you must:

- Immediately report any suspicions of fraud, theft or other dishonest behaviour by others.
- Never improperly use your position, or any information you receive through your work, to further your own personal interests, or help others to do so.
- Never help anyone to break or evade the law.
- Treat colleagues, customers and others with whom you do business with respect, dignity, fairness and courtesy.
- Ensure all dealings with customers, suppliers or third parties are properly recorded and transparent.
- Never initiate or respond to online and public comments about South East Water or its employees as a representative of South East Water without approval.

We respect people and our work environment

We value and invest in a diverse, safe, inclusive and empowered workplace for all. To provide our services, our assets are appropriately managed and employed for authorised purposes. Accordingly, you must:

- Contribute to promoting a safe working environment by taking responsibility for workplace health and safety, following procedures and reporting any issues as soon as possible.
- Treat all people you deal with through your work with dignity and respect. Don't misuse your position or authority.
- Make employment decisions based on merit, and not on attributes that are irrelevant to the role or work performed.
- Never discriminate, harass or bully colleagues, customers, visitors or anyone else.
- Respect other's opinions, differences, perspectives and expertise.
- Actively participate in the performance planning and development process.
- Obtain written permission from your people leader (per the Instrument of Delegations) before undertaking work with another organisation.

- Take responsibility for the protection and care of our assets and the assets of others. Never engage in acts of sabotage, theft or damage to any assets.
- Be fair and inclusive by acknowledging the skills, abilities and backgrounds of others.
- Adhere to all relevant policies and processes regarding working with children and vulnerable customers.
- Comply with all lawful and reasonable directions given to you by South East Water.

We actively manage conflicts of interest

Perceived, potential or actual conflicts of interest can harm associations and reputation as well as exposing South East Water to legal risk. We do not exploit relationships for personal advantage. You must:

- Be alert to actual, perceived or potential conflicts of interest, disclose them in accordance with our Conflicts of Interest Declaration process and cooperate in their management.
- Seek approval for any outside business interest (paid or unpaid), directorships, partnerships or a direct or indirect financial interest which has the potential to be in conflict with your employment, the interests of South East Water or its partners, customers or suppliers.
- Keep an arm's length relationship when dealing with customers or suppliers and obtain written approval to do business, transact with or hold a direct or indirect financial interest in entities (including customers or suppliers) you deal with in the course of your work.
- Disclose any personal associations with a third party that you are involved in evaluating or negotiating with, whether for employment, as a customer or supplier or any other reason which may compromise you, the third party or South East Water.
- Declare any close personal relationships involving people in a direct hierarchical relationship (i.e. in the same reporting line, where one person has supervisory or decision-making authority over the other) through our Conflicts of Interest Declaration process.
- Declare any close personal relationships with other employees, whether inside or outside a direct hierarchical relationship, and monitor the risk of a conflict of interest arising.

We adhere to privacy and confidentiality obligations

South East Water maintains private and confidential customer and commercial information. Misuse of this information can have severe consequences for our reputation and customer trust. You must:

- Keep information secure. This includes not sharing confidential information with other employees unless they need it to perform their work.
- Never record or release confidential information about customers or colleagues to third parties unless the person the information relates to has agreed or if it is required under law.
- Follow all policies relating to the maintenance of passwords and user profile setup. Never allow someone else to log on using your individual details.
- Collect, use, store, handle, update and destroy information, particularly personal information, in line with applicable laws, policies and processes at all times.
- Never disclose any information about South East Water that is not already in the public

domain without the proper authority to do so.

We don't receive or make inappropriate payments, benefits or gains

The giving and receiving of payments, benefits or gaining an improper advantage may make it difficult to remain impartial about persons or organisations providing them. You must:

- Reject any gift, reward or entertainment, including discounted products or services, for yourself or others, if it could create an obligation or expectation that could conflict with your work.
- Never try to improperly influence the outcome of an official decision, by offering a gift, payment or benefit that is not legitimately due.
- Only accept gifts, benefits or entertainment hospitality in line with our policies.
- Obtain proper approval for and properly record any donations, sponsorships, charitable contributions, gifts and entertainment you accept from, or give to, a third party on behalf of South East Water.
- Refuse all offers of gifts, benefits or hospitality from people or organisations about whom we are likely to be making decisions involving tender processes, procurement, enforcement, licensing or regulation.

We meet our regulatory and internal compliance obligations

Effective compliance management reduces risks associated with reputation, financial loss, inefficiencies and safety. You must:

- Follow all applicable health, safety and wellbeing obligations that apply to your work.
- Don't take, or fail to take, any action that may breach this Code of Conduct, the law, our policies, procedures or practices.
- Complete all required training and education programs to build and maintain your awareness and understanding of relevant laws, policies, procedures and practices.
- Understand your responsibilities, expected performance and behavioural standards.
- Seek guidance from your people leader if you are unsure whether a particular law, policy, procedure or practice applies.

Supporting documents to our Code of Conduct

- Acceptable Use of Social Media
- Age Discrimination Act 2004 (Cth)
- Anti-Discrimination, Harassment & Bullying Policy & Grievance Procedure
- Allegations Policy
- Charter of Human Rights and Responsibilities Act 2006 (Vic)
- Child Safe Standards
- Code of Conduct for Victorian Public Sector Employees
- Compliance Policy
- Conflicts of Interest Declaration Process
- Conflict of Interest Policy Framework (Victorian Public Sector)
- Disability Discrimination Act 1992 (Cth)
- Diversity & Inclusion Policy
- Drug & Alcohol Policy
- Environment Policy
- Equal Opportunity Act 2010 (Vic)
- Fraud & Corrupt Conduct Policy
- Gifts, Benefits & Hospitality Policy
- Gifts, Benefits & Hospitality Policy Framework (Vic. Public Sector)
- Guidance for Use of Social Media in the Victorian Public Sector
- ICT Acceptable Use Policy
- Instrument of Delegation
- Performance, Conduct & Disciplinary Policy & Process
- Performance Management Policy
- Privacy Charter
- Public Interest Disclosure Policy
- Quality Policy
- Racial Discrimination Act 1975 (Cth)
- Safety & Wellbeing Policy
- Sex Discrimination Act 1984 (Cth)