

Code of conduct



Executive responsible: Managing Director

Version date: 11 September 2019 **Version:** 5 **Next review date:** 11 September 2021

1. Introduction

- 1.1 This Code of Conduct (Code) applies to all Icon Water workers¹.
- 1.2 This Code is in addition to any fiduciary and other legal duties which may apply to Icon Water workers. Icon Water workers must comply with all Icon Water policies and procedures.

2. Purpose

- 2.1 This code underpins Icon Water's values of safety, excellence and openness. Its purpose is to:
 - a. articulate the high standards of honesty, integrity, ethical and law-abiding behaviour expected of Icon Water workers
 - b. encourage the observance of those standards to protect and promote the interests of Icon Water's Shareholders and other stakeholders (including employees, customers, suppliers, the community and creditors)
 - c. encourage Icon Water workers to report any reported violations of this Code or unethical or unlawful behaviour in accordance with Icon Water's processes for public interest disclosures and whistleblowing.

3. Application

- 3.1 The Code applies to Icon Water workers when they are:
 - a. performing their duties
 - b. engaging with existing and prospective suppliers
 - c. representing Icon Water
 - d. attending work-related social events.

4. Standards of conduct

- 4.1 Icon Water expects each Icon Water worker to:
 - a. behave at all times in a way that upholds Icon Water's values, integrity and corporate reputation
 - b. observe high standards of honesty, integrity and ethical and law-abiding behaviour when performing their duties
 - c. act with care and diligence when performing their duties, working cohesively with colleagues to achieve Icon Water's corporate goals
 - d. treat other Icon Water workers, contractors, customers and community members with fairness, respect and courtesy
 - e. contribute to a workplace culture that is free from harassment, discrimination and bullying
 - f. observe human rights across all parts of Icon Water's business and supply chains and report any alleged human rights violation
 - g. support Icon Water's commitment to tackling modern slavery
 - h. comply with all applicable laws and regulations covering Icon Water's operations
 - i. comply with Icon Water's policies and procedures
 - j. not start work or return to work with a BrAC greater than 0.00%

¹ As defined in the *Work Health and Safety Act 2011* (ACT) a worker is a person/s who carries out work in any capacity including an employee, contractor, employees of sub-contractors, labour hire workers, apprentices, students or volunteers.

- k. not start work or return to work while under the influence of illicit drugs
- l. not use, store or bring alcohol and/or illicit drugs onto any Icon Water workplace
- m. avoid placing themselves in a position that may lead to an actual or potential conflict of interest, or the reasonable perception of a conflict of interest
- n. fully and frankly inform their supervisor of any personal or external business interest that may lead to an actual or potential conflict of interest
- o. keep any personal or external business dealings separate from Icon Water's business dealings
- p. not improperly use their position, property or information acquired through their position, for personal gain or gain of an associate or to compete with or harm Icon Water
- q. use all reasonable endeavours to protect Icon Water assets and ensure their efficient use
- r. only use an Icon Water asset (including a vehicle, computer, tablet, phone or money) for legitimate business purposes or other approved purposes
- s. not accept any gift, including hospitality, from a third party (including existing or potential customers or suppliers) that may have been intended as an inducement to place the worker or Icon Water under an obligation to the donor.

5. Addressing possible breaches of the code

- 5.1 Icon Water expects Icon Water workers to report promptly and in good faith any actual or suspected violation by a worker of the standards, requirements or expectations set out in this code.
- 5.2 Any legal and compliance issues are to be reported without delay to the relevant Executive and, where appropriate, the Board. Where non-compliance is identified, appropriate rectification or other appropriate action and steps shall be taken to prevent any repetition of a non-compliance.
- 5.3 Reports of other potential code breaches should be made to one of the following:
 - a. the worker's supervisor
 - b. your supervisor
 - c. Manager Risk and Emergency Management²
 - d. the Group Manager People, Solutions and Support or the People, Solutions and Support Business Partner³
 - e. the relevant General Manager
 - f. the Managing Director
 - g. through the Whistleblower Program or grievance process.
- 5.4 In responding to complaints, Icon Water will:
 - a. take all complaints seriously
 - b. investigate complaints either internally or through an independent service provider, following applicable procedures
 - c. take steps to ensure that any worker who makes a complaint in good faith is protected from victimisation or discrimination for making the complaint.
- 5.5 Icon Water workers who breach any of the behaviours and conditions outlined in the Code may face disciplinary action up to and including termination of employment, in accordance with the misconduct provisions of the *Icon Water Limited and Combined Unions Enterprise Agreement 2014*.

² Responsible for fraud and corruption control.

³ ActewAGL's People and Legal Group provides a range of human resource services to Icon Water under the Corporate Services Agreement.