

Business Ethics

A guide for contractors,
customers and suppliers

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01

Purpose of the Business Ethics Guide

1.1 Why do we have a Business Ethics Guide?

TransGrid works in partnership to provide safe, reliable and efficient transmission services to NSW, the ACT and the National Electricity Market. Our employees are required to award and supervise contracts as well as engage services to support TransGrid's activities.

Our Business Ethics Guide and Code of Ethics and Conduct outline the principles, standards and values that guide our decisions and behaviours. We expect all contractors, customers and suppliers to maintain these standards and principles when working with us. Any breach of this Guide or the Code may cause us to invoke penalty clauses in your contract and/or bring civil or criminal proceedings.

If you have any questions about our Code of Ethics or Conduct or this Business Ethics Guide, contact our Head of Internal Audit by calling 02 9284 3000.

1.2 Our values

Our Code of Ethics and Conduct, together with our values, guides our decisions, actions, and the way we conduct business.



Committed

We are determined to do the right thing and always do what we say we will.



Collaborative

We willingly share our knowledge and expertise and seek diverse opinions to create the best solutions.



Enterprising

We foster a culture of creativity to drive innovation so that everyone can contribute to business growth.



Caring

We care for our people, our customers and our community and we support each other to get the work done safely.

1.3 Ethics checklist

When making decisions, you should consider the relevant facts as well as the ramifications of the decision on others. The following checklist presents a series of questions that you can ask yourself when unsure about any work-related ethical issue.

- » Is this an honest decision?
- » Am I making this decision professionally, fairly and compassionately?
- » Who or what may be affected by my decision?
- » Would I like to be treated in the same manner?
- » Is my decision or action consistent with TransGrid's values?
- » Could I justify the decision or action to my friends and family?
- » Would I be comfortable reading about this in the newspaper?

1.4 Reporting corruption, maladministration, wastage or compliance breaches

When working with TransGrid, you are responsible for reporting any suspected fraud or corrupt activities, maladministration, serious and/or substantial wastage, regulatory compliance breach (potential or otherwise) or a breach of our Code of Ethics and Conduct involving our business.

You should report matters of this nature to your TransGrid representative. If you do not feel comfortable with this approach, you may report the matter to the Head of Internal Audit directly by calling 02 9284 3000 or you may follow the Whistleblower process below.

1.5 Whistleblower service

Our Whistleblower Service provides you with the opportunity to raise the concerns outlined above anonymously. In line with our values, we will treat anyone who reports issues, or anyone who is the subject of a report, with respect and dignity.

Phone	1800 826 109 (toll free, available 24/7)
Email	transgridwhistleblow@deloitte.com.au
Online	www.transgridwhistleblow.deloitte.com.au » Username: TransGrid » Password: Whistleblower (note password is case sensitive)
Mail	TransGrid, reply paid 12628 A'Beckett Street, Melbourne Victoria 8006

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Our responsibilities and accountabilities

2.1 TransGrid staff

Our staff are accountable for their actions. We expect them to abide by the law and act in accordance with our policies, procedures and Code of Ethics and Conduct.

2.2 Contractors, customers and suppliers

You are responsible for maintaining high ethical standards and for performing your duties with integrity. You should:

- » be courteous towards the public, our staff, our customers, our suppliers and our contractors.
- » obey all relevant laws and contractual obligations
- » not bring TransGrid into disrepute.

Both TransGrid's reputation and your company's reputation depend on your commitment to upholding our Guide to Business Ethics.

2.3 Core responsibilities



Health and Safety

Safety is our number one priority. We are responsible for providing a safe work environment and for putting the health, safety and welfare of our employees, contractors, customers and the community first.

You must abide by relevant health and safety legislation when working with TransGrid.



Community, environmental and legal responsibilities

TransGrid has community, environmental and legal responsibilities, which we expect you to honour when doing business with us. You are responsible for your own conduct. We expect you to know and understand your responsibilities, the work you are to do, how it is to be done, and the required results.



Fairness and equity

We expect you to be honest, fair, compassionate and non-discriminatory when dealing with our staff, clients, contractors, suppliers and the public, and to treat everyone with courtesy and sensitivity. We endeavour to be fair by ensuring our processes are appropriate, open, transparent and accountable.



Respect for the individual

You should avoid causing distress or harm to others, respect individual differences, and co-operate with others as members of a team.

2.4 Anti-discrimination, harassment and bullying

We aim to foster a culture of mutual respect and provide an environment where employees and others in the workplace are treated fairly. Everyone should feel free from unlawful discrimination, harassment, vilification, and bullying. We have a zero tolerance approach to violence, assault and threats against people and property.

We will not condone the following under any circumstances:



Discrimination

This includes discrimination based on race, sex, age, religion, national origin, sexual orientation, gender identity, religious beliefs, political beliefs, carer or parental responsibilities, relationship or family status, industrial/trade union/ employer association membership or non-membership or activity, or disability.



Harassment (including sexual harassment), bullying and vilification

This includes:

- » Unwelcome conduct, including of a sexual nature, which makes a person feel offended, humiliated or intimidated.
- » Creating a hostile working environment.
- » Behaving in a way that a reasonable person would find offensive, humiliating, threatening or intimidating.
- » Unreasonable behaviour directed towards an individual or group that creates a risk to health and safety.
- » Inciting hatred, severe contempt or severe ridicule of a person or group.



Victimisation

This occurs, for example, when a person is retaliated against because they have lodged a complaint or they intend to lodge a complaint.

Aiding, abetting or encouraging others to engage in the above conduct is also unlawful. If you are in doubt, discuss any issues with your TransGrid representative.

2.5 Drugs and alcohol

We have a duty of care to provide a safe working environment. We expect you to be fit for duty when working with TransGrid, and not endanger your own safety or the safety of others in the workplace.

While at a TransGrid workplace, you must not consume, possess, distribute, sell or be under the influence of alcohol or illegal drugs. You must not perform any work without informing us if you are taking prescribed or non-prescribed drugs that may adversely affect you.

2.6 Using and safeguarding our resources

You may only use TransGrid resources to do your work if you have prior approval. Our resources include material, equipment, vehicles, money (including cheques, credit cards, accounts and securities), documents, records, data and information, time and employees.

You must protect these resources from loss, damage, misuse or theft and report any actual and suspected losses in writing.

2.6.1 Electronic and data equipment

Appropriate and limited personal use of TransGrid's resources such as telephones, photocopiers, laptops and tablets is acceptable. However, all use needs to comply with corporate guidelines on security and inappropriate use. You must not use the internet or email to view and/or send any offensive, defamatory, confidential material or material which would bring TransGrid into disrepute.

2.7 Corporate information and intellectual property

You must take care to maintain the security of TransGrid's corporate information. When you provide services to TransGrid under contract, you should not assume that you retain the rights to intellectual property created as part of those services. The contractual arrangements you have with TransGrid will expressly address the retention of intellectual property.

2.7.1 Confidential information

You should not access, use or share TransGrid's confidential information without TransGrid's prior permission. There is no automatic right to retain or pass on confidential information to a third party.

Examples of confidential information include:

- » Contracts and related documentation
- » Information provided to us by our customers or potential customers
- » Information relating to our business strategies, potential new business opportunities, practices or tactics
- » Information on the operation of the transmission system including data on outages, system operating limits, congestion, constraints and load
- » Network planning information on the development of the network to facilitate future connections
- » Information that you become aware of that may be part of draft documents by TransGrid or other parties but have not yet been published
- » Information on planned investment in the transmission system including line routes
- » Information about the physical location and security of our assets.

2.7.2 Personal information

Personal information includes personal contact information, facts or opinions about people, salary information, information about land holders, or a hard or soft copy file such as a performance review.

You must abide by privacy legislation governing the collection, holding, use, correction, disclosure or transfer of personal information obtained through your dealings with TransGrid and all such information must be retained in Australia. You must also adhere to the Australian Privacy Principles in privacy legislation.

2.7.3 Reporting of misuse or security breaches

You must report any breach of security or misuse of TransGrid's confidential or personal information to TransGrid's Compliance or Internal Audit teams.

2.7.4 Leaving TransGrid

If you cease working with TransGrid, you must not use or take advantage of any confidential or work-related information obtained during your tenure. You must also return all TransGrid equipment, property and documentation.

2.8 Gifts, benefits and hospitality

You must not offer hospitality, gifts or benefits which are designed to gain any advantage for yourself or your organisation (or which the public could reasonably see as likely to cause a TransGrid employee to depart from his or her proper course of duty) to any TransGrid employee.

2.8.1 Token gifts, benefits or hospitality

Token gifts do not have a significant monetary value, are inconsequential or trivial, and are not offered on a frequent basis. You may give or accept a token gift up to the value of \$100 if it is not likely to be seen as compromising. Gifts of cash (in any amount) are never acceptable.

2.8.2 Non-token gifts, benefits or hospitality

To avoid placing staff in a position which could be challenged, you should avoid offering them non-token gifts, benefits and hospitality (such as free attendance at sporting events or restaurant invitations).

Employees are obliged to record all offers of non-token gifts, benefits or hospitality in the TransGrid Gifts, Benefits and Hospitality register immediately, and note whether they accepted the item or not.

2.8.3 Ramifications of trying to influence TransGrid staff

Offering money or gifts to obtain a benefit or favour is a form of corruption and is illegal. Similarly, seeking or accepting a bribe is unlawful. Employees are obliged to immediately report any gift, benefit or hospitality that has been offered to obtain a benefit or influence how TransGrid operates.

You must not offer staff involved in evaluating tenders, or contract administrators (such as staff who manage contracts/orders, certify payments or approve expenditure) any form of gift, benefit or hospitality.

2.9 Conflicts of interest

A conflict of interest arises if your own interests, or those of other people close to you, conflict with your obligations to TransGrid. For example, a conflict would exist where you, your relative, company, employer or other person known to you has an interest, perceived or otherwise, that could lead you to be influenced in the way you carry out your duties with TransGrid.

When you have a conflict of interest, perceived or otherwise, you must disclose it to TransGrid.

2.10 Engaging externally

TransGrid places great value on engaging with the wider community. We must be open and honest with our stakeholders, but remain mindful of how our words or actions can impact upon our reputation.

You must not make any public comment or statement that would lead anyone to believe you are representing TransGrid, or expressing its views or policies unless you have been given permission by TransGrid's Head of Corporate Affairs.

This includes comments or statements made at public and community meetings; via the media; or when it is reasonably foreseeable that the comments or statements will become known to the public at large.

2.10.1 Using social media

TransGrid embraces social media as an important tool for corporate and business engagement. Our policy on social media platforms does not apply to personal use – where TransGrid is not mentioned - however the lines between public, business and professional can easily become blurred. You should abide by the following expectations:

» **Be transparent**

- If commenting on TransGrid in a private capacity, disclose your name and your association with TransGrid. Use a disclaimer when referring to work done by TransGrid, commenting on a TransGrid issue or providing a link to a TransGrid website.

» **Be honest**

- If you are authorised to comment on behalf of TransGrid in a business capacity, only comment on topics within your own area of responsibility at TransGrid. For other matters, contact the Head of Corporate Affairs or the Media and Communications Manager in the Corporate Affairs team.
- Identify all copyrighted or borrowed material with citations and links. Ensure that any content published is factually accurate and complies with TransGrid policies.

» **Be aware and respectful**

- Consider the impact your contribution might have on public perceptions of TransGrid or towards its employees.
- Never reveal confidential or commercially sensitive information about TransGrid, such as financial forecasts or projected business performance.

Revision no	Date	Approved by	Amendment
1	1 May 2020	Brian Salter, Executive Manager – Legal, Governance and Risk	



