



TransGrid

TRANSGRID BUSINESS ETHICS

A Guide to Contractors, Customers and Suppliers





TransGrid Business Ethics – A Guide to Contractors, Customers and Suppliers

TransGrid is committed to the ethical standards and principles outlined in our Code of Ethics and Conduct and this Business Ethics Guide. Each contractor, customer and supplier is expected to maintain these standards and principles when undertaking work for, or on behalf of TransGrid.

A handwritten signature in black ink that reads "Paul Italiano". The signature is written in a cursive, flowing style.

Paul Italiano
Chief Executive Officer

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TransGrid's business

TransGrid in partnership with contractors, customers and suppliers provides safe, reliable and efficient transmission services to NSW, the ACT and the National Electrical Market.

TransGrid employees are required to award and supervise contracts as well as engage services to support TransGrid's activities.



TransGrid's values

TransGrid's Code of Ethics and Conduct, together with our values, guides our decisions and actions, and how we conduct business.

Committed

We deliver on our promises and are accountable for our actions.

Enterprising

We embrace new ideas and are not afraid to challenge the norm.

Collaborative

We work as one to achieve our vision.

Caring

We treat all people with respect and dignity.



Ethics check list

The following checklist presents a series of questions that any person, whether they be a TransGrid employee, contractor, customer or supplier can ask when unsure about any work-related ethical issue.

We should ask ourselves when making a decision:

- Is it an honest decision?
- Has the decision been made professionally?
- Has the decision been made fairly and compassionately?
- Who or what may be affected by this decision?
- Would I like to be treated in the same manner?
- Does this require for me to act in a way inconsistent with TransGrid's values?
- Could I justify the decision or action to others?
- Would I be comfortable reading about this in the newspaper?



Responsibilities and accountability

TransGrid staff

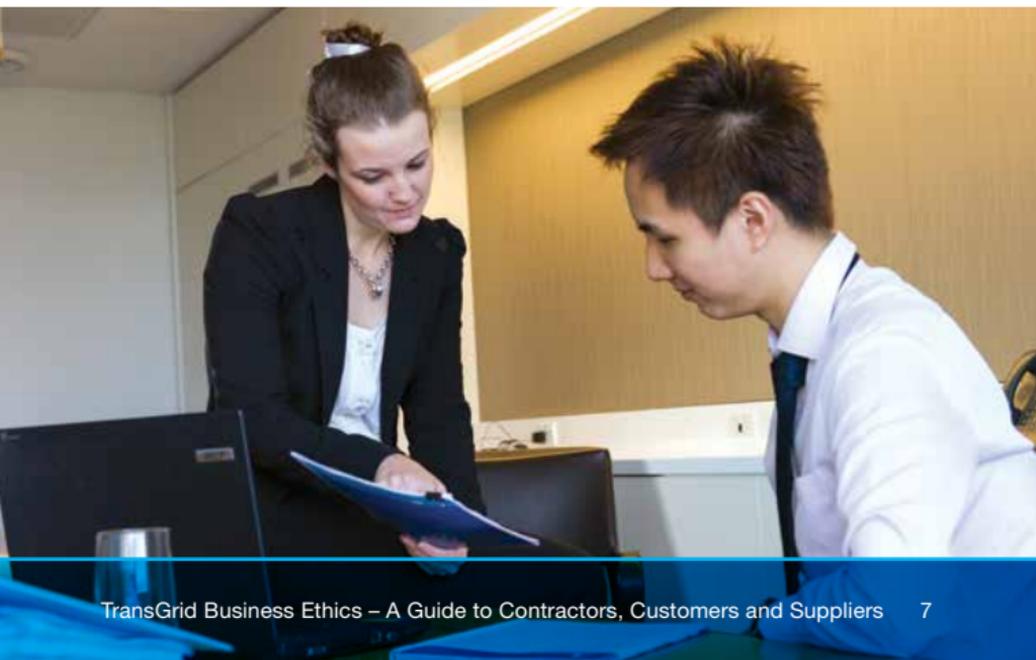
We expect our staff to abide by the law and all relevant TransGrid policies and procedures. Our staff are accountable for their actions and are expected to act in accordance with TransGrid's Code of Ethics and Conduct, which includes acting in good faith and with due care and diligence.

Contractors, customers and suppliers

Similarly, you are responsible for maintaining high ethical standards in all dealings with, or on behalf of, TransGrid. TransGrid expects all parties to perform their duties with integrity. Your company's reputation – and that of TransGrid's – are dependent on your commitment to uphold our Business Ethics.

Behaviour should be courteous towards the public, TransGrid staff, TransGrid's customers and people from other contractors and government agencies, and should not bring TransGrid into disrepute.

All people must obey all relevant laws and contractual obligations.



Health and safety

Safety is paramount and therefore everyone should protect their own safety and that of others in the work environment and the public arena. TransGrid is responsible for providing a safe work environment and for putting first the health, safety and welfare of its employees, contractors, customers and the community who are affected by TransGrid operations. All contractors must abide by relevant health and safety legislation when conducting work for and on behalf of TransGrid.

Community, environmental and legal responsibilities

TransGrid has community, environmental and legal responsibilities, which you are expected to honour when doing business with and on behalf of TransGrid. All business associates and staff are responsible for their own conduct.

All people are expected to know and understand what their responsibilities are, what work they are to do, how it is to be done, and the results to be achieved in connection with TransGrid work.

Fairness and equity

All personnel are expected to be honest, fair and nondiscriminatory in their dealings with TransGrid staff, TransGrid's clients, other contractors, suppliers and their people, as well as the public. 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 other forms of harm, respect other people's individual differences and rights, and treat all people with courtesy and sensitivity.

Ethical decision making and behaviour

Where decisions involve your own judgment, you should make sure that the relevant facts are considered as are the ramifications that the decision may have on others.

You are expected to be honest, fair, compassionate and non-discriminatory in dealings with TransGrid employees and the public, and to treat all people with courtesy and sensitivity. You should avoid causing distress or other forms of harm to others, respect individual differences, and co-operate with each other as members of a team.



Reporting corruption, maladministration, wastage or government information contravention

When doing work with, for, or on behalf of TransGrid, all businesses and personnel have a responsibility to report any suspected corruption, maladministration, serious and substantial wastage, or contravention of government information management requirements involving TransGrid.

Suspected instances can be reported to TransGrid's **Manager Audit** on TransGrid's Ethics and Conduct Helpline, 1800 261 993 or 02 9284 3123.

**Breaches of
TransGrid
Business
Ethics Guide**

Any breach of this Guide may cause penalty clauses in the contract to be invoked and/or civil or criminal proceedings to be brought.



Ethics helpline

If you have any questions about TransGrid's Code of Ethics or Conduct, or this Business Ethics Guide, or privacy information that you are unsure of, contact the **Manager Audit** on the Ethics and Conduct Helpline on 1800 261 993 or 02 9284 3123.

TransGrid Ethics Helpline

Toll Free 1800 261 993

Phone 02 9284 3123

Web www.transgrid.com.au



EXCELLENCE IN ALL WE DO: EMPLOYEES AND CONTRACTORS

Anti-discrimination, harassment and bullying

In line with TransGrid's values, the organisation aims to foster a culture of mutual respect and provide an environment where employees and others in the workplace are treated fairly and are free from unlawful discrimination, harassment, vilification and bullying.

TransGrid has a zero tolerance policy regarding violence, assault and threats by employees against other people and property. This behaviour will not be condoned.

Treat others with respect

Under no circumstances will TransGrid condone its employees, contractors, customers or suppliers:

Discriminating against someone by treating a person less favourably, either directly or indirectly, because of a ground of discrimination.

Grounds of discrimination by which TransGrid may be bound include but are not limited to: race (including colour, nationality, descent, ethnic, ethno-religious or national origin), sex, pregnancy (including potential pregnancy), carers' responsibilities, family responsibilities, carer or parental status, being childless, breastfeeding, industrial/trade union membership or non membership or activity, employer association membership or non membership or activity, transexuality, transgender and gender identity, HIV/AIDS, religious belief or activity, marital status, relationship status, homosexuality, sexuality, sexual preference, lawful sexual activity, disability including physical, mental and intellectual, age, political belief or activity, compulsory retirement, irrelevant criminal record, irrelevant medical record, and association (that is, association with a person who has one or more of the attributes for which discrimination is prohibited).

Harassing

someone by exhibiting unwelcome behavior that a reasonable person would expect to offend, humiliate, threaten or intimidate another. Creating a hostile working environment can also be unlawful.

Vilifying

someone by inciting hatred, severe contempt or severe ridicule of a person or group because they are or are thought to be of a particular race, sexual orientation, transgender or to have HIV/AIDS.

Sexually harassing

someone by exhibiting unwelcome conduct of a sexual nature, which makes a person feel offended, humiliated or intimidated. Behaviour which creates a hostile working environment can also be unlawful.

Bullying

someone by exhibiting repeated, unreasonable behaviour directed towards an individual or group that creates a risk to health and safety.

Victimising

someone by retaliating against a person, or subjecting a person to a detriment because they have lodged a complaint, they intended to lodge a complaint or they are involved in a complaint of unlawful conduct.

Remember

- Aiding, abetting or encouraging others to engage in the above conduct is also unlawful.
- If contractors, customers and suppliers are in doubt, they should discuss any issues with their TransGrid client, TransGrid's People and Culture Group or contact the Workplace Behaviour Hotline on 1800 252 855.

Drugs and alcohol

TransGrid has a responsibility in ensuring that safety in the workplace is not compromised due to the effects of drugs and alcohol. There is an expectation that workers will be fit for duty, ensuring that they do not, by the consumption of drugs or alcohol, endanger their own safety or the safety of any other person, including customers or clients, in the workplace.

Consequently, whilst at TransGrid workplaces, contractors, customers and suppliers must not:

- Be under the influence of alcohol or be under the influence of illegal drugs;
- Consume alcohol or consume or be in possession of illegal drugs;
- Distribute illegal drugs;
- Sell alcohol or illegal drugs; or
- Perform any work without informing their TransGrid client or Team Leader/**Manager** if they are taking prescribed drugs, or non prescribed drugs, that may adversely affect their performance or conduct.



EXCELLENCE IN ALL WE DO: USING TRANSGRID'S RESOURCES

TransGrid resources may only be used to do your work for TransGrid with TransGrid's approval. TransGrid's resources include material, equipment, vehicles, money (including cheques, credit cards, accounts and securities), documents, records, data and information, time and employees.

Protecting and using resources

You may be entrusted with TransGrid resources and honouring that trust is a basic responsibility. You must protect these resources from loss, damage, misuse or theft. All actual and suspected losses must be reported in writing.

Electronic data and equipment

Personal use of resources

Appropriate and limited personal use of TransGrid's resources such as telephones, mobile phones, digital cameras, faxes, photocopiers, desktop portable computers 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 harm TransGrid or bring it into disrepute.

Corporate information and intellectual property

Contractors, customers and suppliers must take care to maintain the security of TransGrid's corporate information that they become aware of in their work with TransGrid. Intellectual property rights cannot be assumed and these requirements need to be expressly addressed in contractual arrangements.

Confidential information

TransGrid's confidential information shall not be accessed, used, disclosed, or made available without the authorisation of TransGrid. There is no automatic right to pass on confidential information to a third party.

Examples of potentially confidential information that you may encounter at TransGrid include:

- Contracts and contract-related documentation (such as communication with a customer or tenderer);
- Information provided to us by our customers or potential customers;
- Information relating to our business strategies, practices or tactics; and
- Information about the physical location and security of our assets.

Personal information

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 you should acquaint yourself with and adhere to the privacy principles in privacy legislation.

Personal information can include information, or even an opinion, on someone that is documented in a database or a hard or soft copy file such as a performance review.

Reporting of misuse or security breaches

Any breach of the security of TransGrid's confidential or personal information, or any misuse of confidential or personal information will be reported to TransGrid's Corporate Audit and Risk Manager.

Ceasing employment

If a person ceases employment or contract work with TransGrid, they must not use or take advantage of any confidential or personal information obtained in the course of their employment or contract with TransGrid. Before ceasing work they must return all TransGrid equipment, property and documentation provided as part of their work.

Reference: Privacy Act 1988

EXCELLENCE IN ALL WE DO: SUPPLIERS AND BUSINESSES

Gifts, benefits and hospitality

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) must not be offered to any TransGrid employee.

Token gifts, benefits or hospitality

Token gifts may be given or accepted if the gift is not likely to be seen as compromising. Token gifts do not have a significant monetary value, are inconsequential or trivial, and are not offered on a frequent basis. Token gifts may include chocolates, calendars, pens, cups or gifts up to an approximate value of \$50.00.

Non-token gifts, benefits or hospitality

Generally non-token gifts, benefits and hospitality of any kind should not be offered so as to avoid staff being placed in any position which may potentially be the subject of challenge.

If a gift, benefit or hospitality is considered to be more than token and acceptable, permission will be sought within TransGrid from the relevant Team Leader/Manager. Non-token gifts may include hospitality such as free attendance at sporting events or an invitation to a meal at a restaurant, and gifts such as pens.

Gifts of cash (in any amount) are never acceptable.

Staff involved in evaluating tenders must not be offered any form of gift, benefit or hospitality from tenderers or potential tenderers nor should offers be made to contract administration (that is, day to day management of contracts / orders, certifying payments or approving expenditure).

**Ramifications
of attempting
to influence
TransGrid staff**

If a gift, benefit or hospitality is offered to influence the way TransGrid does its work, it will be reported immediately to an employee's manager or the **Manager Audit**.

If money or gifts are offered in order to obtain a benefit or favour it is illegal. It is called bribery and is one form of corruption. Similarly, if a bribe is sought or accepted, it is corruption and will be reported.

All non-token gifts, benefits or hospitality will be recorded in the TransGrid Gifts, Benefits and Hospitality register immediately following the gift, benefit or hospitality being received/offered, noting whether the item was accepted or not.



Conflicts of interest

If a conflict of interest in your work for TransGrid exists or arises, you must disclose it to TransGrid. A conflict of interest arises if your own interests, or those of other people close to you, conflict with your obligations to TransGrid.

A conflict would exist where you have a personal interest, or your relative, company, employer or other person known to you has an interest, that could lead you to be influenced in the way you carry out your duties to TransGrid.



EXCELLENCE IN ALL WE DO: USING TRANSGRID'S RESOURCES

Our community

TransGrid places great value on engaging with the wider community. Yet, in seeking to engage, contractors, customers and suppliers we must not only be open and honest with our stakeholders, but also be mindful of how our words or actions can impact upon TransGrid's and our own reputation.

Public comment or statement

Non-TransGrid personnel must not make any public comment or statement that would lead anyone to believe that they are representing TransGrid, or expressing its views or policies unless they have been given permission by an authorised officer of TransGrid.

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.

The use of social media

TransGrid embraces social media as an important tool for corporate and business engagement. Whilst, it is important to note that TransGrid's policy on social media platforms does not apply to personal use – where TransGrid is not mentioned - the lines between public, business and professional can become easily blurred. Consequently all contractors, customers and suppliers should be acquainted with the summary provided below of TransGrid's expectations.



Be transparent A person should disclose their name and their association with TransGrid. A disclaimer should be used when referring to work done by TransGrid, commenting on a TransGrid issue or providing a link to a TransGrid website.

Be honest Only comment on topics within your own area of responsibility at TransGrid.
Expertise For other matters, contact the relevant subject matter expert who has been accredited for social media engagement.

Use of other's material Identify all copyrighted or borrowed material with citations and links. Ensure that any content published is factually accurate and compliant with TransGrid policies (e.g. on confidentiality, privacy, copyright).

Be mindful and respectful A person should be mindful of the impact their contribution might make to people's perceptions of TransGrid, itself, or towards some or all of its employees.

Sensitive information Do not reveal confidential or commercially sensitive information about TransGrid (e.g. financial forecasts, future business performance).



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