

# CODE OF CONDUCT

## Background

South East Water has a proud history throughout its years of operation in delivering quality products and services. The community, stakeholders and regulators expect us to use our authority and responsibility professionally, fairly and with the highest level of integrity when delivering these products and services.

To assist in conducting our business within applicable laws, regulations and external and internal standards, the Code of Conduct is written as a set of general principles of employment and should be read in conjunction with supporting documents that can be found on the intranet and in the Code of Conduct.

The Code of Conduct provides a broad range of expected standards but cannot address every situation encountered. Therefore, when dealing with these situations and to assist in determining the appropriate course of action, ask yourself the following questions:

- 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 a reasonable person think it is acceptable?
- Are my actions transparent?
- Would it be portrayed positively in the media?

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

## What is the Code of Conduct?

The Code of Conduct sets acceptable standards and expectations for the way we work at South East Water, provides a practical set of principles to help you make decisions and demonstrates acceptable and unacceptable behaviours, in your day to day work. The Code of Conduct is linked our strategic framework and values (We put safety first, We're bold, We care, We're real, We discover and We deliver sustainably)..

The Code of Conduct also provides a binding link with the Victorian Public Sector Values (Integrity, Responsiveness, Impartiality, Accountability, Respect, Leadership, Human Rights), which are designed to foster the development of an efficient, integrated and responsive public sector that is highly ethical, accountable and professional in the way it delivers services to the community. South East Water has developed and implemented policies and processes tailored to our own operating environment, to support the application of the Code of Conduct for Victorian Public Sector Employees.



### **Who does the Code of Conduct apply to?**

The Code of Conduct applies to anyone who is employed by or works at South East Water including employees (both permanent and temporary), contractors and consultants and applied as a term of contract of employment. South East Water encourages our partners to adopt and maintain similar conduct and ethics principles to those outlined in the Code of Conduct.

### **When does the Code of Conduct apply?**

The Code of Conduct applies at any time you are identified as a representative of South East Water. This includes outside your immediate workplace 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 principles or the spirit of the Code of Conduct or associated policies will be considered a serious breach and will be investigated. Breaches of the Code of Conduct or policies may result in disciplinary action, ranging from a verbal warning through to the termination of your employment for serious breaches. All breaches of the Code of Conduct are required to be recorded and reported in line with South East Water policies and procedures.

### **How can I be sure my conduct complies with the Code of Conduct?**

While the Code of Conduct provides general guidance and expectations regarding conduct, no code or policy can ever cover every conceivable circumstance you may face. In everything you do, you are expected to listen to and act upon your conscience to help build and maintain South East Water's and your own reputation.

### **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 People and Safety representative.

### **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, must complete a declaration, to show that they understand the principles of the Code of Conduct, confirm that they have complied with them in the previous 12 months and agree to comply with them in the future.

### **What should I do if I suspect a breach of the Code of Conduct?**

Honestly report all actual or suspected breaches of this Code of Conduct, the law, policies and procedures immediately to your people leader. You are able to report actual or suspected breaches at any time under the Protected Disclosure Policy and Procedure where the conduct is dishonest, corrupt, fraudulent, illegal and unethical or any other type of reportable conduct.

## **Code of Conduct Principles**

### **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 are required to:

- Undertake your duties with due diligence and care. You are accountable for decisions and actions you take.
- Deal fairly, honestly, timely, respectfully and with objectivity with all colleagues, customers, suppliers, third parties and business partners.
- Exercise your authorities, including any relevant limits. You are responsible for understanding your authorities and are accountable for how they are used.
- 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 and reflects a professional image.

### **We act honestly, fairly and with integrity**

Our success and standing is dependent on honesty, fairness and integrity. Operating responsibly underpins everything we do. For that reason you are obliged to:

- 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.

- Treat all people you deal with through your work with dignity and respect. Do not misuse your position or authority.
- Make employment decisions based on merit, and not on attributes that are irrelevant to employment or performance.
- Never unlawfully discriminate, harass or bully colleagues, customers, visitors or anyone else in the workplace.
- Respect other's opinions, differences, perspectives and expertise.
- Contribute to promoting a safe working environment by taking responsibility for health and safety, adhering to procedures and reporting any issues as soon as possible.
- Actively participate in the performance planning and development process.
- Obtain written permission from your people leader before undertaking work with another organisation.
- Intellectual property created or invented in the course of your employment remains the property of South East Water unless otherwise agreed.
- Take responsibility for the protection and care of our and others assets. Never engage in acts of sabotage, theft or damage to our and others assets.
- Be fair and inclusive by acknowledging the skills, abilities and background of others.
- If your activities involve children, vulnerable customers, etc. adhere to our related policies and processes to protect them from harm.

### **We actively manage conflicts of interest**

Perceived or actual conflicts of interest can harm associations and reputation as well as exposing South East Water to legal damage.

- Be alert to actual, perceived or potential conflicts of interest and disclose them as per our processes.
- Seek approval for any outside business interest (paid or unpaid), business ventures, 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 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 customers or suppliers you deal with in the course of your work.
- Disclose to your people leader 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.

### **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 on our reputation and customer trust.

- Keep information secure. This includes not sharing private or confidential information with other employees unless they need it to perform their work.

- Never record or release private or unsubstantiated information about customers or colleagues to third parties unless the person the information relates to has agreed or if South East Water is required to release the information under the law.
- Follow all policies and procedures 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 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.

- Never accept any gift, reward or entertainment, including discounted products or services, if it could create any 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 applicable policies and processes.
- Only entertain customers and business associates with lunches, dinners etc., if the nature and value of the entertainment is reasonable in light of the nature and value of the business relationship with South East Water and the seniority of the parties attending.
- 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.

- Do not take, or fail to take any action, that may breach this Code of Conduct, the law, policies, procedures or practices. Always operate within legal boundaries and follow the spirit as well as the letter of the law.
- 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.
- If you are unsure whether a particular law, policy, procedure or practice applies, seek guidance from your people leader.

### **Supporting documents to the Code of Conduct that provide more information on obligations**

[Acceptable Use of Social Media](#)

[Compliance Policy](#)

[Conflicts of Interest Declaration Process](#)

[Conduct & Counselling Policy](#)

[Diversity & Inclusion Policy](#)

[Drug & Alcohol Policy](#)

[Environment Policy](#)

[Fraud & Corruption Policy](#)

[Gifts, Benefits & Hospitality Policy](#)

[ICT Acceptable Use Policy](#)

[Instrument of delegation](#)

[Performance Management Policy](#)

[Privacy Charter](#)

[Protected Disclosure Policy & Procedure](#)

[Quality Policy](#)

[Safety & Wellbeing Policy](#)

Age Discrimination Act 2004 (Cth)

Australian Human Rights Commission Regulations 1989 (Cth)

Charter of Human Rights and Responsibilities Act 2006 (Vic)

Child Safe Standards

Code of Conduct for Victorian Public Sector Employees

Conflict of Interest Policy Framework (Victorian Public Sector)

Disability Discrimination Act 1992 (Cth)

Equal Opportunity Act 2010 (Vic)

Gifts, Benefits & Hospitality Policy Framework (Victorian Public Sector)

Guidance for Use of Social Media in the Victorian Public Sector

Racial Discrimination Act 1975 (Cth)

Sex Discrimination Act 1984 (Cth)

**Code of Conduct declaration**

I,           [name and surname]          

fully understand the standards and principles of responsibility and conduct outlined in the Code of Conduct and related policies which are expected of me when working on behalf of South East Water.

I understand that my people leader or People and Safety are available to answer any questions I have and/or have satisfactorily addressed any questions that I have raised.

While working at South East Water, I will ensure that at all times I have and will continue to adhere to the South East Water required standards, principles and policies, which are available on our intranet, from my people leader or People and Safety.

I am fully aware that my employment may be reviewed and disciplinary action may be taken should I not adhere to these requirements.

Name           [name and surname]          

Signed           [signature]          

Date           [date]