

together as
one group



Zinfra
Your trusted partner
in energy



Jemena
bringing energy to life

Doing the right thing

Code of Conduct (March 2025)

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A message from our MD

Our Group has a proud history of delivering energy services – safely and reliably to millions of Australian homes and businesses. As we work together towards achieving our Group’s shared vision of **‘creating sustainable energy solutions with communities’**, we hold ourselves to the highest standards of business conduct.

We meet these standards through the commitment of every team member (our employees and contractors) to conduct ourselves according to this Code of Conduct.

This Code and our Values guide our day-to-day actions, how we make decisions, and how we expect to be treated by our colleagues and leaders. Diversity and respect are fundamental to who we are as a business and we are committed to enabling a workplace that’s safe, inclusive and supportive and where everyone can truly belong.

I encourage you to read this Code carefully and talk about it with your peers and teams. Respect it, live it and be courageous if you have questions and concerns, or where you see actions, decisions, or interactions that do not meet the expectations set out in the Code.

Thank you for doing your part to live and uphold our Code.

David Gillespie
Managing Director

Our Values

It’s not just about what we do, but how we do it. Our Values underpin everything we do. They define the way we think, speak and act and are a consistent guide for team members regarding what we expect. They will underpin our journey in the next one to two years to work – better and stronger together – to become a **high performing, sustainable, benchmarked efficient** business.

We want our people to love working for our Group, feel inspired to do their best every day and be recognised in the industry as the best in their field. We want our people to feel safe to express their opinions, be accountable for their actions and treat each other with respect.

We support one another but have zero tolerance for fraudulent, corrupt or unethical behaviour.



Better together
We value the diversity of our people, working together to achieve great outcomes



Be accountable
We accept responsibility to deliver our commitments



Find a better way
We find improved and innovative ways to work



Think like a customer
Our actions consider our customers, community, and other stakeholders



We care
We value safety and wellbeing for ourselves, our community and environment

Our Code of Conduct

The Group is committed to doing the right thing and by being consistent and ethical we will continue to strengthen the loyalty and trust that exists between each of us and our stakeholders.

What is our Code of Conduct?

We set certain standards within the Group for the way we behave as a business, and the way we expect our team members to behave in the performance of their roles and when representing the Group. At the most fundamental level we require all of our people to be simply *doing the right thing* and this Code of Conduct sets out what that means for you.

The Code of Conduct explains the standard of behaviour that is required to act in accordance with our values, comply with all relevant laws, regulations, policies and procedures and operate in accordance with our desired culture of good corporate governance.

Our Code of Conduct is to guide all of our people to make informed, ethical decisions in going about their day to day work.

How to use our Code of Conduct

Whilst we expect compliance with our policies and procedures, this Code of Conduct is the overarching document of the Group Management System. Our policies and procedures cannot anticipate every situation, so we rely on you to use good judgement and to speak up when you have questions or concerns.

Each section within the Code of Conduct provides team members with the information about why the topic is important to us. It provides expectations of team members, where to go for support and additional resources that provide more details, such as policies and procedures, found under “other important resources”.

Who does the code apply to?

Every team member - employees, directors, officers, contractors and suppliers must adhere to the Code of Conduct, regardless of location or role (even outside of business hours where activity relates to, or reflects on the Group).

Raising conduct concerns

Questioning conduct is essential to protect the integrity of our team and business.

If you think a decision or action is not consistent with our Code of Conduct or our Values, you have the right and responsibility to see that concern raised. You will be supported all the way. You do not need to be directly affected by an issue to raise it.

Where to raise conduct concerns

Under each section of our Code of Conduct there is a section on “where to go for support” which provides the relevant contacts within the Group to assist you. If you are in any doubt, contact your people leader in the first instance who can assist you.

If you are ever unsure about what is required of you or are confused about the meaning and application of legal or other requirements, please raise your questions in person, in writing or over the phone with your leader, colleagues or General Manager.

1. Our people

Health, Safety and Environment

We seek out healthier and safer ways of doing work and respect the natural and built environments in which we operate.

The Group is committed to caring for our people, the environment, and the communities in which we operate. This means that we take care when conducting our business activities so that every employee and contractor returns home safe every day and we positively contribute to the environments and communities where we work.

We understand the work we do has health, safety and environmental risk and everyone within the Group must take responsibility to actively identify and manage those risks.

What can you expect from the Group

We are committed to providing you with a safe working environment and with the resources, training and tools to enable you to do your work safely.

Health, safety and environment practices are governed by our policy, standards and procedures by which every employee and contractor must abide.

In all cases, these resources are established with the objective to meet our values and

recognised legal and technical obligations, as we have no appetite for harm to our people or the environment in our business operations.

What we need from you

- Understand and follow all relevant health, safety and environment requirements;
- Stop work and report any circumstances that represent an immediate risk to health, safety or the environment;
- Identify opportunities for improvement and participate in developing and implementing health, safety and environmental solutions;
- Follow Group policies, standards and procedures;
- Use the resources and supporting systems that are in place to meet our health, safety and environment requirements;
- Consider your own physical and psychological safety and health and that of others in all that you do;
- Encourage and support team members to participate in health, safety and environment activities, and

- Report any health, safety or environment related incidents, near misses and hazards.

Where to go for support

- Your People Leader
- Health and Safety Representative (HSR)
- Health, Safety and Environmental Business Partner
- Human Resources Business Partner
- Legal Team
- Business Resilience & Compliance Team

Other important resources

- Health, Safety, Environment and Quality Policy
- Crisis and Emergency Management Framework and plans
- [Group Health Safety and Environment intranet page](#)
- Group HSEQ Manual
- Safe Work Method Statements
- Your site-based Health, Safety and Environment Management Plan

Diversity and Inclusion

We are committed to embedding inclusive practices that drive inclusion in our workplace, build a sense of belonging for all and support all team members to realise their full potential and contribute to the Group's success.

Every team member will be afforded the basic human rights of equitable access to opportunities to develop and succeed in their role irrespective of race, ethnicity, age, gender, work status, relationship status, sexual orientation, gender identity, culture, religion, family status, disability or social background.

We know that diversity of thought is good for our business, it creates opportunities for innovation, enables us to solve problems better and delivers meaningful benefits to our people, customers and the diverse communities we serve.

What can you expect from the Group

The Group's commitment to Diversity, Inclusion and Belonging means that we:

- seek to attract and retain a diverse workforce that reflects, respects and supports the diversity of our communities
- create a culture and workplace environment where our diverse workforce feels included, can realise their potential and are able to contribute fully
- facilitate equal opportunity in all employment, development and promotion decisions, free of bias
- provide an environment where people feel safe to speak up when others are excluded,

or treated unfairly on the basis of their identity

- meet all legislative obligations that serve to protect our people and the business from harm
- must not tolerate behaviours such as illegal discrimination, harassment, sexual harassment, bullying, victimisation, vilification in any circumstance or from anyone in our business

In situations where relevant laws and regulations differ from the Group's values and standards, the higher requirement must be observed and People Leaders will provide clear guidance to team members regarding acceptable behaviours.

What we need from you

- Be inclusive, collaborative and supportive of every person you interact with in the course of doing your job, in accordance with our Values and this Code of Conduct
- Ensure that you have a clear understanding of what is required of you to perform at your best in your role and participate actively in our performance and development processes
- Treat team members, customers and clients fairly, with respect, dignity, and without discrimination;

- Be mindful of the implications of your decisions and actions at all times and support your fellow team members in speaking up and raising concerns.

Where to go for support

- Your People Leader
- Human Resources Business Partner or Manager
- Group Employee Experience & Capability Manager
- Diversity, Inclusion and Belonging Manager
- Employee Assistance Program (external)

Other important resources

- Diversity and Inclusion Intranet Page
- Issue Resolution Intranet Page
- Workplace Behaviour Standard
- Group Leave standard
- Workplace Adjustment Guidelines
- Group Approach to Remote Working
- Acacia Employee Assistance Program

Bullying, Harassment and Sexual Harassment

The Group is committed to providing a safe and respectful work environment for team members and others interacting with the Group. We aim to provide an environment free from bullying, harassment, sexual harassment, unlawful discrimination, racial and religious vilification and victimisation.

Harassment, bullying, sexual harassment, racism and other disrespectful behaviours can cause harm. Our commitment to health, safety and wellbeing means these behaviours have no place at the Group and will not be tolerated in our workplace.

We all have the right to work in a healthy, safe, respectful and inclusive environment where we are treated with dignity and courtesy.

What can you expect from the Group

Our commitment is to provide a safe and respectful environment for employees and any other person, including our customers, contractors and visitors, who interact with our organisation.

We will take a proactive approach to:

- develop and implement initiatives to eliminate unacceptable behaviours;
- educate all team members about the behaviours expected in our workplace, how to safely and positively intervene when inappropriate behaviour is witnessed or experienced, and how to report inappropriate workplace behaviour

At all times we will be supportive and provide compassion and encouragement to any colleagues (employees or contractors) who speak up.

What we need from you

- Lead by example and role model behaviours that are consistent with our Code and Values;
- Always be aware of cultural considerations and demonstrate respect,
- Report any incidents of unacceptable conduct including bullying, harassment and sexual harassment whether directed towards you or other team members;
- If you see someone being subject to bullying, harassment or sexual harassment, step up and take action to provide support.

Where to go for support

- Your People Leader
- Human Resources Business Partner
- Employee Assistance Program (Acacia)
- Legal Team

Other important resources

- Workplace Behaviour Standard
- Respect@Work SharePoint Site

Privacy and Personal Information

We respect the privacy and the personal information of individuals.

Personal information means any information that could identify an individual, either from that information alone, or in combination with other information which is reasonably likely to come into the possession of the Group through our day to day operations.

We also collect and hold information about our team members for managing information for employment purposes.

What can you expect from the Group

We respect the personal information we hold about our team members and our customers and expect you to respect the information we hold in the same way. We manage personal information in accordance with the Company's Privacy Policy and applicable Privacy laws.

What we need from you

- Always ensure personal information of individuals is used and protected in accordance with the Privacy Policy and Procedures;
- Understand our standards and procedures on collecting and storing personal information

Where to go for support

- Your People Leader
- The Legal Team

Other important resources

- Privacy Policy
- Privacy Procedure

Breaches of the Code of Conduct

All queries about the interpretation and application of the Code of Conduct will be treated seriously, respectfully and assessed in a timely manner.

Our People Leaders are held accountable for their own behaviour and also for the conduct of their employees. Any suspected or known breaches of the Code of Conduct should be reported to your people leader or can be raised through the Whistleblower Policy.

What can you expect from the Group

If a breach has occurred, the appropriate corrective or disciplinary action will be determined after individual circumstances and severity of the breach have been taken into account.

Examples of corrective or disciplinary action can include:

- verbal or written warnings;
- termination of employment.

Misconduct that may result in disciplinary action can include (but is not limited to):

- directly engaging in and/or either requesting or directing others to engage in conduct which would breach the Code of Conduct and/or policies or procedures;
- failure to raise known or suspected breaches;
- retaliating against another person for reporting a conduct concern;
- failure to demonstrate leadership and diligence to ensure the Code of Conduct, Our Values and the law are upheld.

Breaches which potentially constitute criminal or illegal conduct may also result in referral to appropriate authorities and/or legal recovery.

In some instances the Group has a requirement to report potential criminal breaches, outcomes of such reports are outside of the Group's control.

Breaches of fraud, bribery and anti-corruption laws are serious offences, which can result in fines, and/or imprisonment and significant reputational damage for both the Group and its employees. Any breach will be treated as serious misconduct warranting disciplinary action.

What we need from you

- To abide by the Code of Conduct at all times
- Raise and report concerns promptly
- Fully cooperate with investigations as required

Where to go for help

- Your People Leader
- Human Resources Business Partner
- Legal Team

Other important resources

- Whistleblower Policy
- Compliance with the Law Policy
- Disciplinary Procedure
- Compliance Management Framework

2. Our corporate responsibilities

Relationships with authorities

The Group respects the authority of governments and regulators wherever we conduct business.

The Group's ability to conduct business is directly affected by the decisions made by governments and regulators as external stakeholders.

The Group regularly shares information and opinions with external stakeholders on issues that affect our operations and our industry in general. Such exchanges are essential to enabling informed decision-making by all.

What can you expect from the Group

We work to maintain positive and constructive relationships with governments, regulators, their agencies, officials and personnel.

What we need from you

- If you provide information to an external stakeholder on behalf of the Group, you must ensure that all information is accurate and appropriate for the purpose. Errors or omissions may damage our reputation or could constitute a breach of the law;
- If you are required to make representations on behalf of the Group on matters involving government officials or regulators, you must comply with all applicable laws and regulations, and ensure all representations are in line with the Group's requirements;
- If you are unsure about whether the information you are sharing externally to the Group is appropriate to be shared, speak with your people leader.

Where to go for support

- Your People Leader
- Legal Team
- Corporate Affairs Team

Fraud and Corruption

We do our best to ensure our actions are consistent with our Values. We demand of ourselves and of each other the highest standards of individual and corporate integrity. This means we have zero tolerance towards fraud and corruption. Compliance with anti-corruption laws is essential to protect the Group's reputation and to preserve our social licence to operate.

Fraudulent and corrupt conduct in the course of business operations will not be tolerated in any form or degree. Apart from significant performance, financial and reputational impacts, such behaviour undermines engagement, our culture and may compromise welfare and safety.

Fraud means a dishonest act or omission causing actual or potential financial loss to a SGSPAA entity, customer, supplier or stakeholder:

- where deception is used at the time, immediately before or immediately following the act or omission; or
- through a deliberate falsification, concealment, destruction or use of falsified documentation used or intended for use for a normal business purpose; or
- through the improper use of information or position for personal financial benefit; or
- including theft of cash or assets.

Corruption means dishonest activity in which employees/contractors/3rd parties act contrary to the interests of the business and abuse their position of trust in order to achieve some personal gain or advantage for themselves or for another person or entity.

Financial misstatement, manipulation of any financial reporting or acts or omissions to avoid financial controls may constitute fraud or corrupt conduct.

What can you expect from the Group

In addition, the guiding principles below apply across the Group:

- zero tolerance towards any level of fraud and corruption;
- maintain a culture of a high level of fraud risk awareness at all times;
- compliance with establishment and implementation of sound internal controls to prevent and detect fraud and corruption.

What we need from you

- Ensure you understand how the requirements apply to your role, behaviour and business decisions.
- Ensure you comply with procedures and requirements in the procurement of goods and services.

- Seek approval before:
 - providing commercially sensitive information to an external person;
 - engaging a supplier who will interact with others on our behalf;
 - offering to undertake a community donation, sponsorship of an event or project.
- Maintain the integrity of our financial records by ensuring all financial transactions you make in doing your job are accurately recorded and sufficiently detailed.
- Stay vigilant for warning signs of fraud and corruption and promptly report any red flags for further investigation.

Where to go for support

- Your People Leader
- Procurement Team
- Legal Team
- Internal Audit Team
- Human Resources Business Partner
- Group Compliance Management Team

Other important resources

- Fraud Control Plan
- Whistleblower Policy
- Procurement and Contract Management Procedure

Ring-fencing

In the course of your job you may learn of information about the Group, our customers and other organisations we work with. Sharing this information with others may make us non-compliant with our electricity or gas ring-fencing obligations.

Ring-fencing is a suite of structural and operational separation requirements that apply to pipeline service providers (including JGN as well as Jemena's gas transmission pipelines¹) and electricity distribution network service providers (such as JEN). Ring-fencing is designed to prevent the misuse of market power by monopoly businesses in a way which may affect competition in contestable parts of the market.

What can you expect from the Group

We aim to avoid a situation where our activities on our gas and electricity network businesses, or our transmission pipeline businesses, give other Group businesses (including our contestable electricity business, or gas processing businesses) an unfair advantage over their competitors. This means we must ensure:

- that entities within the Group do not disclose confidential information, or use it for other, unauthorised purposes;
- there is appropriate cost allocation between the Group's assets and businesses;

- no marketing staff of the Group's gas transportation businesses (JGN or Jemena's gas transmission pipelines²) are involved in a related business that produces, purchases or sells gas, and vice versa;
- no staff involved in the provision or marketing of direct control services for JEN are involved in the provision or marketing of contestable electricity services by a related electricity service provider (such as Ovida); there is no cross promotion of contestable electricity functions (such as Ovida) by Jemena Electricity Network (JEN) staff, and separate and distinct brands are used for contestable electricity functions and for JEN.

What we need from you

Ensure you understand our electricity and gas ring-fencing obligations and know how they apply. Additionally, you must:

- do your annual gas and electricity ring-fencing compliance training;
- time write, fund and allocate costs appropriately;

- not recommend our contestable electricity works functions (such as Ovida) to JEN customers;
- not share JEN leads to contestable electricity works functions;
- be careful with sharing confidential information when interacting with other internal teams;
- protect confidential electricity and gas information, and not use it for unauthorised purposes;
- immediately report any suspected non-compliance of a ring-fencing obligation to your People Leader and the Regulatory Compliance team.

Where to go for support

- Your People Leader
- Regulatory Compliance Team via regcompliance@jemema.com.au
- Legal team

¹ DDP, Atlas lateral, and Roma North lateral have time limited transitional exemptions from the ringfencing requirements until 2 Mar 26. The NGP

is currently exempt from the ringfencing provisions for a period of 15 years from its commissioning date.

² As above.

Other important Resources

- AER Electricity Distribution Ring-Fencing Guideline
- Electricity Ring-Fencing Guideline Compliance Manual (ELE LEG MA 0001)
- Gas Ring-Fencing training
- Compliance Management Framework
- JGN Ring-fencing Guideline Compliance Manual
- Gas Transmission and Processing Ring-fencing Compliance Manual (GAS-999-OM-QA-001)
- Confidential Information Manual

Conflict of interest

Always be mindful of any relationship or association which may be, or appear to be, a conflict of interest with the Group.

A conflict of interest arises when a team member's position within the Group, or their financial or other personal considerations / interests outside of work, has the potential to affect, or could have the appearance of affecting, their judgement, objectivity or independence.

Common examples of potential or perceived conflicts of interest include:

- having a personal relationship with another employee or with a third party who can influence decisions such as salary, performance rating or promotion;
- investments or personal interest, including those of close relatives, which might influence or appear to influence your judgement;
- pursuing, awarding or maintaining business opportunities for non-legitimate business purposes;
- receiving money, information, property or services or other forms of personal benefits (directly or indirectly) from suppliers or other third parties doing, or proposing to do, business with the Group;
- holding outside jobs and affiliations;
- offering or accepting gifts, hospitality and entertainment.

What can you expect from the Group

Your People Leader will follow processes to ensure any question of a potential conflict of interest raised by a team member is properly reviewed and a decision made about the right course of action.

What we need from you

- While on the job or in your personal time, nothing you do should conflict with your responsibilities to the Group or compromise the quality of your work performance, your commitment to your work, or your ability to make impartial business decisions;
- Always excuse yourself from any decision-making process if there is a possibility of your objectivity appearing compromised, for example, supplier evaluation, tendering process, suppliers performance management and commercial negotiations;
- Promptly advise your People Leader of any outside activities, financial interests or relationships that may involve you directly or indirectly either in an actual conflict of interest or the appearance of one.

Where to go for support

- Your People Leader
- Procurement Team
- Legal Team
- Human Resources Business Partner

Other important resources

- Procurement and Contract Management Procedure
- Compliance with the Law Policy
- Compliance Management Framework
- Gift Register

Procurement and Contracting

We strive to engage with our suppliers to enhance value and outcomes for mutual benefit. We are committed to the highest standards of corporate responsibility, particularly our health, safety and environmental obligations, including ethical behaviour, human rights and social responsibilities.

We have an integrated approach to commercial procurement and contract management. This means we can maximise our strategic and competitive value, build and maintain effective supplier relationships and grow our business in a managed and responsible way.

What can you expect from the Group

We will take great care to:

- promote equity, inclusion and diversity in our processes by encouraging the purchase of goods and services from businesses owned by, or that assist underrepresented groups.
- undertake honest, competitive, fair, transparent, commercially sound and planned approach when engaging with, assessing, selecting, contracting and managing our suppliers,
- ensure our business operations and dealings comply with all relevant laws and regulations and meet the contractual obligations of clients, customers and suppliers.
- apply formal governance processes - to consistently identify, assess and manage commercial and legal compliance risks.
- engage with pre-qualified suppliers who demonstrate competency and can deliver quality goods and/or services on time,

safely, scope according to all contractual, legal and regulatory obligations and who comply with our Code of Conduct. Suppliers will be assessed prior to engagement and re-evaluated at regular intervals throughout the term of the relationship.

What can you expect from the Group

- We will set clear objectives and targets.
- Promote fair and effective competition tailored to the circumstances.
- Engage stakeholders, supplier groups and peers in a timely and collaborative manner.
- Ensure that everything we procure, where possible, has the lowest negative and highest positive social, environmental and economic impacts.
- Ensure supplier engagements contain clear requirements and effective change management processes across their lifecycle.

What we need from you

Ensure supplier relationships maximise value by managing and maintaining quality and safety, improving productivity and identifying opportunities for improvements and innovations.

Ensure we uphold our stance on business ethics, and maintain our zero tolerance for bribery, corruption or fraud.

Work together to identify, assess and address operations and supply chain risks including:

- Modern Slavery
- Third Party Risk
- Asset, Health, Safety, Environment & Sustainability

Provide any supplier you engage, on behalf of the Group, with access to our Code of Conduct.

Where to go for support

- Your People Leader
- Procurement Team
- Legal Team

Other important resources

- Procurement and Contract Management Policy
- Procurement and Contract Management Procedure
- [Modern Slavery Statement](#)
- Group Annual Sustainability Report
- Supply Chain Risk Management Framework

3. Our assets and resources

Protecting our assets

We all have an obligation to protect the Group's assets and use them for their intended purpose.

The Group's assets are both physical and non-physical, and include property, facilities, funds, equipment, information technology, sensitive information and Intellectual property (IP).

Sensitive information and IP includes:

- strategic plans
- operational data, particularly information about our critical gas and electricity assets
- research and other technical data
- business continuity information
- corporate financial data
- employee information
- customer information
- trademarks and designs
- copyright for original material, and
- confidential or 'trade secrets', including know-how and other confidential or Company owned information.

What can you expect from the Group

All assets are essential to the success of the Group and due to their commercial value, precautions are taken to protect them from theft, damage, unauthorised access, use, modification or disclosure.

What we need from you

You are responsible for appropriately using and safeguarding the Group's assets, both physical and non-physical by:

- only using the Group's assets for the purpose and in the manner intended;
- taking precautions to prevent theft, misappropriation, damage or misuse of any of the Group's assets;
- ensuring assets are not provided externally without appropriate approvals;
- never sharing any competitively sensitive 'SGSPAA-owned' information unless authorised to do so. If you are not sure what you can share, check with your People Leader;
- normalising a polite challenge culture as it relates to the wearing or carrying visible or digital ID badges at all times whilst in Group facilities;
- feeling empowered to challenge individuals you don't recognise around their authority to be onsite; and
- reporting all actual or suspected security-related incidents immediately.

You must respect both the non-physical and physical assets of others, and never

knowingly damage or misappropriate those assets.

Where to go for support

- Your People Leader
- Business Resilience & Compliance Team
- Security Monitoring Centre -24/7
- Human Resources Business Partner
- Legal Team
- IT Representative

Other important resources

- Information Security Policy
- Financial Management Policy
- Physical Security Framework
- Physical Access Control Procedures
- Crime Reporting Procedure

Technology and data security

The Group is committed to personal and corporate security by increasing team members' information security awareness and taking measures to protect our information systems.

We provide our team members with information technology to undertake work for the Group. This technology must be used in a secure and responsible way and adequately protected against damage, loss, theft, alteration or unauthorised access or disclosure. Computer hardware, software and stored business information (even when located on personal devices) is, exclusively the property of the Group.

What can you expect from the Group

We have controls and measures in place to assist the Group and its team members with managing the risks associated with inappropriate use of information technology or data. These risks include malware and security breaches that could potentially compromise the confidentiality, integrity and availability of systems and information as well as the safety of team members and customers.

All data created and maintained by our team members and business partners must accurately reflect the underlying transactions and events. Falsifying, concealing, altering, destroying or creating misleading information is not tolerated.

Respecting all relevant laws, the Group reserves the right to monitor, report and where required block the team member use of Group information systems, electronic communications and stored information to satisfy business needs, legal or policy requirements.

What we need from you

The safeguarding of business information is the responsibility of every Group team member and includes:

- adhering to the information security policies;
- reporting actual or suspected security incidents; and
- staying up-to-date with provided information security awareness and training.

Inappropriate use of our technology and data includes:

- using it for unlawful purposes;
- disclosing or publishing the Group's data without permission;
- using the Group's information technology or data against the interest of the Group; and

- accessing or removing the Group's data or intellectual property without authorisation to do so.

If you are responsible for reporting information, whether financial or non- financial, ensure that adequate internal controls exist to support truthful, accurate, complete, consistent, timely and understandable reports.

If you have any concerns about the validity of any reporting process or record-keeping activity, or believe you are being asked to create false or misleading information, report it immediately.

Where to go for support

- Your People Leader
- Digital Security & Risk Team
- Service Desk
- Legal Team

Other important resources

- Information Security Policy
- End User Information Security Policy
- Technical Information Security Policy

Communicating Publicly

From time-to-time, the Group may provide third parties with information or disclosures. These representations must always be clear and transparent and made by company-authorised team members only.

The Group reserves the right and responsibility to make its position known on relevant issues.

What can you expect from the Group

Any publicly available written or verbal communication that can be attributed to the Group or to one of our employees may amount to a public representation. Such acts must only be made by authorised spokespersons and in accordance with relevant policies.

Methods of communicating publicly may include:

- regulatory or policy submissions;
- interviews, speeches, articles and reports;
- information contained on the Group website and other communications channels including social media.

Failing to disclose material information or disclosing inappropriate or inconsistent information has the potential to damage our reputation.

What we need from you

- Official public statements must only be made by authorised spokespersons;
- It may be appropriate to comment on industry matters and the Group's projects via your own social media accounts. When communicating externally, our Values and the Code of Conduct apply if your words or actions are likely to be associated with the Group;
- Commenting on all media on sensitive Group issues requires prior approval from the Corporate Affairs team, examples include:
 - financial information
 - business relationship details
 - negotiations
 - disputes or deals with other parties
 - information on customers
 - shareholder information; or
 - information that discredits the Group or its customers.

If in any doubt, please contact the Corporate Affairs team for guidance.

Where to go for support

- Your People Leader
- Corporate Affairs Team
- Legal Team
- Community Partnership Steering Committee

Other Important Resources

- Media Engagement Policy

Document controls

Approval

Title	Name	Date
GM Human Resources	Nicole Miller	31/03/2025

History

Rev#	Date	Amended By	Document Changes
n.a	15/11/2021	Fiona Haymes	Annual review including adjustments in line with the Sex Discrimination and Fair Work (Respect at Work) Amendment Act 2021 Document Controls section added
n.a	14/11/2022	Fiona Haymes	Annual Review
n.a	1/05/2023	Fiona Haymes	Clarification of expectations on the Group and employees regarding responses to sexual harassment
n.a	21/02/24	Vicki Brennan	End to end review and updating of the entire document to ensure alignment with any legislative requirements and/or process or role changes.
n.a	28/02/2025	Vicki Brennan	End to end review and updating of the entire document to ensure alignment with any legislative requirements and/or process or role changes.