



Code of Conduct – Standard

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1. INTRODUCTION

Powerlink's Code of Conduct (the **Code**) brings to life our Values, culture, and commitment to our customers and to the community. It sets out the standard of behaviour which is expected at Powerlink, to enable Workers to deliver against Powerlink's Purpose and Values. The Code also supports Powerlink's commitment to a diverse, equitable and inclusive workforce and working environment for our Workers. The Code makes clear everyone's responsibility to be accountable for their conduct and contribute to a constructive, productive and safe workplace.

The guiding principles and requirements of the Code need to be applied to each Worker's daily tasks and duties at Powerlink. Where a Worker has any questions or concerns about understanding or applying this Code, they should speak with a Powerlink Leader.

Likewise, if a Worker is aware of something that might be a breach of the Code, it should be raised with a Powerlink Leader so it can be addressed. Raising concerns plays an important role in improving Powerlink's culture, and is part of applying Powerlink's Values.

1.1 Scope

This Code applies to every Worker working for Powerlink.

This Code applies in the workplace, at places where there is a connection with work, or where the Worker's behaviour impacts, or has the potential to impact Powerlink, including (without limitation) when:

- at work/on duty for Powerlink (across all physical and virtual environments).
- attending and representing Powerlink at a work-related event or function. This includes, but is not limited, to conferences, award events, media briefings, meetings.
- wearing Powerlink-branded clothing and items including personal protective equipment, lanyards, photo IDs or identification cards that show the Powerlink brand.
- a Worker can be identified as working for Powerlink (including when away from work, driving a Powerlink vehicle or on Social Media).
- on Powerlink property or premises under the control of Powerlink.

Expectations of appropriate behaviour also extend to our Suppliers who are bound by the *Supplier Code of Conduct*.

1.2 References

There are a number of key pieces of legislation and national guides which underpin the Code of Conduct, which include but are not limited to:

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| Legislation, Codes of Practice and Guidelines |
|---|
| Age Discrimination Act 2004 (Cth) |
| Anti-discrimination Act 1991 (Qld) |
| Australian Human Rights Commission Act 1986 (Cth) |
| Code of Conduct and Conflicts of Interest Best Practice Guide for Government Owned Corporations |
| Corporations Act 2001 (Cth) |
| Disability Discrimination Act 1992 (Cth) |
| Environmental Protection Act 1994 (Qld) |
| Fair Work Act 2009 (Cth) |
| Guide for Preventing and Responding to Workplace Bullying - May 2016 (Safe Work Australia) |
| Human Rights Act 2019 (Qld) |
| Managing the Risk of Psychosocial Hazards at Work Code of Practice 2022 |
| Privacy Act 1988 (Cth) |
| Racial Discrimination Act 1975 (Cth) |
| Sex Discrimination Act 1984 (Cth) |
| Work Health and Safety Act 2011 (Qld) |

In addition to key pieces of legislation, there are also a number of key Powerlink agreements, policies, procedures, guidelines, charters and protocols which underpin the Code, and include but are not limited to:

| Document Code | Document Title |
|------------------|--|
| GOV-STD-A3271 | Compliance Manual |
| STM-FRM-A2488059 | Complaints Management Framework |
| GOV-POL-A1344502 | Corporate Entertainment & Hospitality Policy |
| PEO-P&C-A1498119 | Counselling and Discipline Procedure |
| A2866914 | Customer Service Charter |
| GOV-STD-A668584 | Dealing in Securities Standard |
| AM-POL-0450 | Digital Technology Usage Standard |
| PEO-PRO-A714486 | Employee Complaints Procedure |
| HSE-PRO-A2948327 | Fatigue Management Procedure |
| GOV-PRO-A4688870 | Human Rights Procedure |

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| INF-SR&CS-STD-A2453617 | Information Classification and Handling Standard |
| GOV-FRA-A2119553 | Integrity, Fraud and Corruption Control Framework |
| A2022885 | Land Access Protocol |
| WHS-P&C-PRO-A2151244 | Managing Alcohol and Other Drugs Procedure |
| STM-STD-A3039690 | Media Management Standard |
| INF-STD-A2848512 | Privacy Standard |
| FIN-PRO-A1499954 | Purchasing Card & Expense Reimbursement Procedure |
| A5502053 | Powerlink Managers Enterprise Agreement |
| GOV-FRA-A5411715 | Ring-fencing Framework |
| A5686025 | Sexual Harassment and Sex-based Harassment Procedure |
| STM-GDL-A2993922 | Social Media Conduct Guideline |
| A3116641 | Supplier Code of Conduct |
| A5502055 | Working at Powerlink Union Collective Agreement |
| A5686027 | Workplace Bullying and Anti-Discrimination Procedure |

1.3 Defined terms

| Terms | Definition |
|-----------------------------|--|
| Conflict of Interest | <p>Where a Worker has competing interests or loyalties and these competing interests could interfere with the proper and impartial performance of the Worker's duties at Powerlink, or could have the appearance of affecting the Worker's judgement, objectivity or independence.</p> <p>Conflicts of interest can be actual, perceived, or potential as outlined in detail in this Code.</p> |
| Powerlink Leaders | Includes all Team Leaders, Managers, General Managers, Executive General Managers and the Chief Executive. |

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| Terms | Definition |
|--------------------------|--|
| Sexual Harassment | <p>Sexual Harassment takes the definition in the Sex Discrimination Act 1984 (Cth).</p> <p>A person sexually harasses another person (the person harassed) if:</p> <ul style="list-style-type: none"> a) the person makes an unwelcome sexual advance, or an unwelcome request for sexual favours, to the person harassed; or b) engages in other unwelcome conduct of a sexual nature in relation to the person harassed; <p>in circumstances in which a reasonable person, having regard to all the circumstances, would have anticipated the possibility that the person harassed would be offended, humiliated or intimidated.</p> <p>Other parts of speech and grammatical forms of “sexual harassment” (for example, “sexually harass”) have a corresponding meaning.</p> <p>Please refer to the <i>Sexual Harassment and Sex-based Harassment Procedure</i> for further detail.</p> |

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|---|--|
| Sex-based Harassment (Gender-based Harassment) | <p>Sex-based Harassment takes the definition of 'harassment on the ground of sex' in the Sex Discrimination Act 1984 (Cth).</p> <p>A person harasses another person (the person harassed) on the ground of sex if:</p> <ul style="list-style-type: none"> (a) by reason of: <ul style="list-style-type: none"> i. the sex of the person harassed; or ii. a characteristic that appertains generally to persons of the sex of the person harassed; or iii. a characteristic that is generally imputed to persons of the sex of the person harassed; <p>the person engages in unwelcome conduct of a demeaning nature in relation to the person harassed; and</p> <ul style="list-style-type: none"> (b) the person does so in circumstances in which a reasonable person, having regard to all the circumstances, would have anticipated the possibility that the person harassed would be offended, humiliated or intimidated. <p>The circumstances to be taken into account include, but are not limited to:</p> <ul style="list-style-type: none"> (a) the sex, age, sexual orientation, gender identity, intersex status, marital or relationship status, religious belief, race, colour, or national or ethnic origin, of the person harassed; (b) the relationship between the person harassed and the person who engaged in the conduct; (c) any disability of the person harassed; (d) any power imbalance in the relationship between the person harassed and the person who engaged in the conduct; (e) the seriousness of the conduct; (f) whether the conduct has been repeated; (g) any other relevant circumstance. <p>'conduct' includes making a statement to a person, or in the presence of a person, whether the statement is made orally or in writing.</p> <p>Please refer to the <i>Sexual Harassment and Sex-based Harassment Procedure</i> for further detail.</p> |
| Social Media | <p>The range of web-based communication tools that enable people to interact and share information and ideas online.</p> |

| Terms | Definition |
|--------------------------------|---|
| Unlawful Discrimination | <p>Unlawful Discrimination includes ‘Direct Discrimination’ and ‘Indirect Discrimination’ as defined in the Anti-Discrimination Act 1991 (Qld).</p> <p>Direct discrimination: A person directly discriminates against another person if the person treats, or proposes to treat, the other person unfavourably because the other person has a Protected Attribute.</p> <p>Indirect discrimination: A person indirectly discriminates against another person if the person imposes, or proposes to impose, a condition, requirement or practice that:</p> <ul style="list-style-type: none"> a) has, or is likely to have, the effect of disadvantaging the other person because the other person has a Protected Attribute; and b) is not reasonable. |
| Worker | Any Powerlink employee, or any volunteer, student, contractor, consultant, labour hire worker, apprentice, trainee or anyone who works in any other capacity directly engaged by Powerlink. |
| Workplace Bullying | <p>Workplace Bullying takes the definition in the Fair Work Act 2009 (Cth).</p> <p>Workplace Bullying is repeated and unreasonable behaviour directed towards a Worker, or a group of Workers of which the Worker is a member, that creates a risk to their health and safety.</p> <p>Unreasonable behaviour includes behaviour that a reasonable person, having considered the circumstances, would see as unreasonable, including behaviour that is victimising, humiliating, intimidating or threatening.</p> |

1.4 Roles and responsibilities

| Who | What |
|------------------------------------|--|
| Powerlink Board | Responsible for overseeing and ensuring compliance with the Code of Conduct, while holding Powerlink Leaders accountable for fostering a respectful and safe work environment. |
| EGM People & Corporate Services | Accountable for the sponsorship and implementation of the Code of Conduct. |
| General Manager People and Culture | Responsible for ensuring that the Code of Conduct is fit for purpose, maintained and reviewed regularly with inputs from respective business areas. |

| Who | What |
|--|---|
| Manager Employee Relations and Business Partners | Responsible for developing the training materials and providing specialist input to training delivery on the Code of Conduct. |
| Powerlink Leaders | <p>Responsible for modelling and promoting this Code. Leaders have the ability to influence others by fostering an ethical environment and demonstrate this awareness in performing their duties, and in making decisions.</p> <p>Responsible for ensuring that their team/s understand the requirements of the Code and that Powerlink Leaders are reinforcing the requirements of the Code. Leaders have an obligation to manage any non-compliance in accordance with the <i>Counselling and Discipline Procedure</i>.</p> |
| Workers | <p>Responsible for complying with the requirements of the Code, taking personal responsibility to uphold the Code and demonstrate the principles and Values in the performance of their duties.</p> <p>Responsible for completing initial and refresher training on the Code as directed.</p> <p>Responsible for raising concerns where there is believed to be non-compliance with the Code.</p> |

1.5 Monitoring and compliance

All Powerlink Workers will be required to undertake Code of Conduct awareness training at least every two years. Powerlink leaders are responsible for ensuring that Workers understand the Code requirements and that Powerlink Leaders are reinforcing the requirements of the Code.

Periodic control reviews, employee feedback and incident reports will be examined to ensure compliance with legal standards and effectiveness in preventing harm.

1.6 Risk management

The Code enables workers to perform their duties in a safe and productive environment where diversity is valued.

The Code operates in conjunction with Powerlink's Enterprise Agreements, other standards and procedures to ensure that risks associated with inappropriate behaviour are identified early and managed effectively.

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2. GUIDING PRINCIPLES

Workers are required to act in accordance with the following guiding principles in the performance of their duties, and at all times when representing Powerlink:

2.1 Worker's Responsibilities

Workers will:

a) Uphold Powerlink's Values:

- Accountability
 - I own outcomes and get results.
 - We focus on achieving the best results for our customers and Powerlink.
 - I speak up and am empowered to make a difference.
- Customer
 - We engage with our customers to inform our decisions.
 - I seek innovative solutions to improve customer outcomes.
 - We spend our dollars wisely to drive value for Queenslanders.
- Teamwork
 - We work as one team across Powerlink to achieve more.
 - We build trust through working together.
 - I am open to new ideas and share my knowledge and experience.
- Safety
 - We stop for safety, safety is essential.
 - I care for my wellbeing and others.
 - We plan for safety and seek improvements in our performance.

b) Maintain professional conduct:

- i. Present fit for duty and maintain professionalism, honesty, and diligence in all tasks and interactions.
- ii. Treat everyone with dignity, courtesy, and respect, and remain open to feedback.
- iii. Collaborate to solve problems, seek diverse perspectives, and manage conflicts constructively and respectfully.
- iv. Make decisions within your authority that serve Powerlink's best interests.
- v. Respect and care for Powerlink's property, safeguarding it from theft or misuse.
- vi. Declare conflicts of interest and dedicate work hours to your duties.
- vii. Uphold Powerlink's brand, performance, values, and reputation.

c) Ensure compliance:

- i. Adhere to all relevant Powerlink enterprise agreements, policies, procedures, guidelines, charters protocols and applicable laws.
- ii. Report any suspected wrongdoing and support a workplace that is diverse, equitable and inclusive.

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- iii. Maintain all required skills, licences and qualifications.
- iv. Accurately record attendance and leave.
- v. Follow lawful and reasonable directions.
- vi. Ensure all decisions align with human rights obligations.

2.2 Leader Responsibilities

In addition to the guiding principles outlined above, Powerlink Leaders must:

- a) Reasonably promote the Code within their area and take steps to ensure that any breaches or potential breaches are identified, taken seriously and acted upon appropriately.
- b) Give clear instructions to Workers.
- c) Be approachable and make time to discuss and resolve problems with their team or other Workers.
- d) Include Workers in the decision-making process and ensure that decisions and information is passed on.
- e) Act as a leader and positive role model at all times.
- f) Conduct themselves in a manner that supports Powerlink objectives and is consistent with their role.
- g) Encourage, and be a role model for, a workplace that is inclusive and free from inappropriate conduct.

3. MAINTAINING A SAFE AND PRODUCTIVE WORK ENVIRONMENT

Powerlink is committed to providing a work environment where people are treated fairly, respectfully, and with dignity, free from inappropriate conduct.

3.1 Workplace Bullying, Unlawful Discrimination, Sexual Harassment and Sex or Gender-Based Harassment

Workplace Bullying, Unlawful Discrimination, Sexual Harassment and Sex or Gender-Based Harassment is prohibited at Powerlink.

Refer to the *Sexual Harassment and Sex-based Harassment Procedure* and *Workplace Bullying and Anti-Discrimination Procedure* for more details.

Anyone experiencing or witnessing such behaviour should discuss this with their Powerlink Leader (or one up manager where appropriate), Senior People & Culture Business Partner, or Senior Employee Relations Consultant. Workers may also choose to seek additional support from Powerlink's Employee Assistance Program (EAP) and/or the Health and Wellbeing team. The process for making a complaint is detailed in the *Employee Complaints Procedure*.

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Note: Workplace Bullying should not be confused with reasonable management action taken in a reasonable way, such as constructive feedback, performance management, or individual or group development.

4. HEALTH, SAFETY AND ENVIRONMENT AT POWERLINK

The health and safety of Powerlink's Workers and the communities in which Powerlink operates is essential and forms part of Powerlink's guiding principles and Values.

Powerlink is committed to the protection of the environment and management of adverse environmental impacts as a result of Powerlink activities.

Every individual is responsible and accountable for health, safety and environmental management, and Powerlink Leaders are required to be active role models of this commitment.

4.1 Safe for Life

Safe for Life is about everyone, everywhere, every day.

Safety is essential for all Powerlink Workers and members of the community.

Powerlink will continue working towards improving its safety performance and safety culture.

Safe for Life means demonstrating safe behaviours at all times, being a 'safety leader' who openly reports, discusses and resolves incidents and events in a timely manner, and proactively managing health, safety and environmental risks.

No matter where or what work is performed for Powerlink, Workers must stop for safety if they believe there is an issue.

Workers will:

- stop for safety, safety is essential.
- demonstrate safe behaviours at all times.
- foster psychological safety at all times.
- take responsibility and care for their wellbeing, and the wellbeing of others.
- proactively manage health, safety, environmental and psychosocial risks.
- plan for safety, and seek improvements in Powerlink's safety performance.
- comply with Powerlink's health, safety and environment policies and procedures set out in Powerlink's *Health Safety Environment Management System* and assist others to do the same.
- identify, assess and take steps to control and escalate health, safety, environmental and psychosocial hazards associated with Powerlink work and duties.
- report any accident, injury, illness, near hit or incident to the appropriate Powerlink Leader so that appropriate action can be taken.

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- use the Personal Protective Equipment required for the task being performed, and strongly encourage others to do the same.
- know what to do in the case of an emergency and ensure that visitors are familiar with Powerlink's emergency procedures.
- not undertake work unless they are trained, competent, medically fit and sufficiently rested and alert to do so.
- not assume that someone else will report a risk or concern, and that as a result it does not need to be raised.

4.2 Fitness for Work

All Workers are required to be physically and mentally capable of performing their role, without undue risk of harm to themselves or others, and not adversely affected by drugs, alcohol or fatigue.

Workers contribute to safety by ensuring that they are fit for work and able to perform their role when presenting to work, when on duty, when rostered on call and when representing Powerlink.

Workers will advise their Powerlink Leader of any condition, medical condition and/or medication that negatively affects their ability to undertake their work in a safe and effective manner.

Workers should notify their Powerlink Leader if they have concerns relating to their own fitness for work, or regarding another worker thought not to be fit for work.

Workers will:

- come to work fit and ready to perform work.
- have a discussion with their Powerlink Leader if taking prescribed medication that affects their ability to perform work safely.
- comply with Powerlink's *Managing Alcohol and Other Drugs Procedure*, including the limits and testing procedures outlined within the procedure.
- manage their fatigue appropriately by complying with Powerlink's *Fatigue Management Procedure*.
- not possess, use, or transfer illegal drugs or substances when performing work on behalf of Powerlink.
- not smoke at a Powerlink site except as permitted in a designated smoking area.

4.3 Environmental Management Obligations

Powerlink considers responsible environmental management to be an integral part of its business activities.

Powerlink demonstrates environmental responsibility by minimising environmental impacts and contributing to the long-term benefits of biodiversity, ecosystems and other environmental resources.

Workers must observe Powerlink's environmental processes and procedures when performing Powerlink duties.

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Workers will:

- comply with Powerlink's environmental processes and procedures.
- identify, assess and take steps to minimise environmental impacts associated with Powerlink duties.
- immediately stop any work that may contribute to an environmental incident.
- report to the relevant Powerlink Leader any actual or potential impact to the environment from an accident, incident, spill or release of material so that appropriate action can be taken to prevent, correct and/or control those conditions.
- not ignore a potential or actual environmental incident, or assume that someone else will report it.
- not undertake work that has the potential to impact on the environment unless the Worker is trained and competent to do so, and controls are in place to minimise environmental impacts.

5. REPRESENTING POWERLINK

When representing Powerlink, Workers should behave courteously and professionally. A Worker's conduct reflects on Powerlink and should promote Powerlink as an organisation of highly-skilled professionals.

Workers will wear the applicable current issued uniform where required. Workers will maintain a neat appearance and maintain personal hygiene.

5.1 Public Comment

When communicating externally, Workers must not speak on behalf of Powerlink unless authorised by the Chief Executive or the General Manager Communications, Customer and Engagement.

Before making any comment in public forums (including Social Media forums), or contributing to the analysis and debate of political party policies, or any other public debate in a private capacity, Workers must ensure that they are complying with Powerlink's *Social Media Conduct Guideline*, *Digital Technology Usage Standard*, and *Media Management Standard* where there is a connection between the Worker's external communications and Powerlink.

5.2 Social Media

Workers using Social Media in the course of their duties, or where the Worker's use of Social Media is connected with Powerlink, must ensure their online behaviour remains consistent with this Code, Powerlink's *Social Media Conduct Guideline*, *Digital Technology Usage Standard*, *Media Management Standard* and relevant legislation relating to defamation, privacy and copyright.

Appropriate use of Social Media is a requirement where the worker's use of Social Media is connected to Powerlink, even when it is out of work hours, on private and restricted networks, and on personal technologies and equipment.

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Workers will:

- report media and public comment enquiries promptly to the Communications, Customer and Engagement team, and not respond unless specifically authorised by the Chief Executive or the General Manager Communications, Customer and Engagement.
- take all reasonable steps to ensure that any comments which are made as a private citizen are clearly understood to be personal viewpoints, or those of a separate organisation.
- if representing a trade union or professional association, ensure that it is made clear that any view expressed publicly is on behalf of the union or association.
- not use any Powerlink trademarks, brand or the identity or images of colleagues and other individuals in external communications, including Social Media (and hashtags), unless specifically authorised to do so.
- not post photographs and/or videos of work locations, processes or activities (that would not ordinarily be visible to the public), on Social Media sites without approval.
- Not make any personal comments when representing Powerlink that may negatively impact on Powerlink's reputation.

6. CONFLICTS OF INTEREST

As a government owned corporation with a public ownership status, Powerlink has a high level of public accountability.

Workers are expected to conduct themselves and operate at a high level of ethical standards and for Powerlink to be open, transparent and accountable for how it manages Conflicts of Interest. Workers are expected to conduct themselves impartially, ethically and fairly when performing their duties.

Powerlink is bound by the Corporate Governance Guidelines for Government Owned Corporations which align to the ASX Corporate Governance Principles. This includes Principle 3 – Promote lawful, ethical and responsible decision-making, and in addition includes the *Code of Conduct and Conflicts of Interest Best Practice Guide for Government Owned Corporations*. The Code sets out the standards which are expected of Workers in managing Conflicts of Interests.

Conflicts of Interest can be actual, perceived or potential:

- An **actual** Conflict of Interest involves a current issue that results in a direct conflict between a Worker's current duties and responsibilities and existing private interests.
- A **perceived** Conflict of Interest exists where it could be perceived, or appears, that a Worker's private interests could improperly influence the performance of their duties – regardless of whether or not that is in fact the case.
- A **potential** Conflict of Interest arises where a Worker has an interest that could conflict with their duties in the future.

Powerlink has in place procedures to identify, disclose and manage Conflicts of Interest to reduce the risk of improper behaviour and efficiently deal with any accusations of bias.

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6.1 Identifying and Managing Conflicts of Interest

All Workers are required to avoid Conflicts of Interest where possible. Where a Conflict of Interest cannot be avoided, it must be managed by promptly identifying, disclosing and managing it.

Not all conflicts are 'material' in nature. To be 'material' there needs to exist a credible Conflict of Interest arising, not simply a remote or theoretical possibility. If a reasonable person could not draw a plausible connection between the employee's personal interest and their duties, then the conflict is not 'material'.

See the *Compliance Manual* for more information and examples of non-material conflicts that do not need to be declared.

There are four principles that apply when considering the management of Conflicts of Interest:

- a) **Protect the public interest** – values such as impartiality, integrity and serving the public interest are paramount.
- b) **Support transparency and accountability** – Conflicts of Interest must be managed fairly and effectively with disclosure of private interests or affiliations that could, or could be seen to, comprise unbiased work performance. A consistent and open approach to resolving or managing conflicts of interest provides confidence to Workers and stakeholders that decisions are made and issues are managed appropriately.
- c) **Promote individual responsibility and personal example** - Private interests are generally known only to individuals so Workers must take responsibility for identifying and managing any Conflicts of Interest in accordance with the principles in this Code and Powerlink's procedures.
- d) **Building a supportive organisational culture** – a culture of integrity is supported by Powerlink Leaders holding open communications and dialogue with their Workers to ensure they are comfortable disclosing and discussing Conflicts of Interest in the workplace and protecting disclosed Conflicts of Interest from misuse by others.

6.2 Personal Relationships at Powerlink.

A material Conflict of Interest will exist where there is a power imbalance between the Workers, or if one Worker can influence the other Worker's work and/or work-related benefits.

In carrying out their duties, Workers may find themselves in situations where a decision has to be made that would directly affect a person with whom the decision-maker has a relationship or has had a relationship in the past.

These circumstances are considered a material Conflict of Interest and must be disclosed. While it is not uncommon or wrong for couples or other family members to be working in the same team or division, it is not appropriate for one to have any line responsibility over another.

Where an individual recognises there may be a Conflict of Interest they must advise their Powerlink Leader and notify Powerlink by completing a *Conflict of Interest Declaration Form* and submitting it for

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review and approval so the Conflict of Interest can be recorded and managed in an open and responsible manner.

While having a Conflict of Interest is not a breach of the Code of Conduct, failure to declare and manage a Conflict of Interest may be a breach.

Further information regarding Conflicts of Interest can be found in Powerlink’s *Compliance Manual* and the *Integrity, Fraud and Corruption Control Framework*.

Workers will:

- conduct all business relationships in a lawful, ethical and professional manner.
- avoid business dealings and personal relationships that cause, or may cause, Conflicts of Interest, or create the appearance of a Conflict of Interest.
- excuse themselves from any decision-making process (e.g. procurement, recruitment) where they have an interest that influences, or is perceived as influencing their ability to make an objective and appropriate decision.
- excuse themselves from any work-related decision making that directly involves a Worker’s direct family member or personal relationship.
- not hold positions or investments in organisations that have business dealings with Powerlink if the Worker is in a position to influence transactions, or if the relationship itself creates an actual, potential or perceived Conflict of Interest.
- not hire, promote or directly supervise a relative, unless this has been specifically authorised by the relevant General Manager or Chief Financial Officer, in accordance with the *Conflict of Interest Declaration Form*.
- not misuse Powerlink resources or the Worker’s position to promote or assist an external activity or party.
- not personally undertake any opportunities in which Powerlink could have an interest, and that are identified through the use of Powerlink information, property or resources.
- not directly or indirectly act on inside information (refer to the *Dealing in Securities Standard*).

6.3 Engaging in Secondary/Outside Employment

Prior to engaging in secondary/outside employment, or private business interests outside of Powerlink, Workers must notify their Powerlink Leader, and ensure that the activity will not:

- conflict or interfere with the Worker’s Powerlink duties.
- adversely affect the Worker’s work performance.
- involve information or resources obtained or available through work with Powerlink
- discredit or disadvantage Powerlink.
- provide unfair advantage or benefit to the Worker, or another party.
- occur during Powerlink working hours.

If there is a possibility that any of the above could apply, or there could be an actual, potential or perceived Conflict of Interest, the Worker must:

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- talk with their Powerlink Leader and obtain their written approval to engage in the outside employment/interest.
- have a record of how any Conflict of Interest, or impact, will be managed.
- declare the Conflict of Interest by completing a *Conflict of Interest Declaration Form* and submitting it for approval.

Powerlink resources such as telephones, photocopiers and computers must not be used for the purposes of secondary employment or private business interests. The use of Powerlink resources for personal commercial gain or profit is not permitted at any time.

7. CONFIDENTIALITY AND USE OF POWERLINK INFORMATION

7.1 Worker Obligations

When performing work on behalf of Powerlink, Workers have an obligation to protect Powerlink's confidential information and to use it for its intended purpose. 'Information' refers to all internal and external data, held in either physical or electronic formats. During the course of their duties, Workers may acquire information about Powerlink, its customers, other Workers, suppliers, or other third parties that is confidential, competitively sensitive and/or proprietary. Workers should assume that company information is confidential or competitively sensitive and not for external distribution unless they have a clear indication that Powerlink has publicly released the information.

Information must only be used in accordance with the requirements of the *Information Classification and Handling Standard*. It must not be used for personal benefit, or for the benefit of anyone outside Powerlink, and should only be accessed and used if necessary in the performance of Powerlink duties.

Where Workers are not sure what information they can share, they should speak with their Powerlink Leader and refer to the *Information Classification and Handling Standard* for further guidance.

Workers will:

- maintain the confidentiality of Powerlink's information.
- report any improper use of, or unauthorised access to Powerlink information to a Powerlink Leader.
- seek advice if considering dealing in securities associated with Powerlink's operations.
- carefully consider the nature of the information they are sharing with those external to Powerlink.
- not disclose inside information to anyone outside Powerlink (with the exception of any disclosures made in accordance with any whistle-blower or public interest disclosure frameworks), including family and friends, unless it is appropriately authorised, documented and is necessary. This does not include disclosures made to a Worker's union or legal advisors for the purposes of seeking support or advice on a personal matter related to their own employment or on behalf of a union member. In such cases information should be shared in confidence.
- not store or transmit confidential information outside of Powerlink's network/system without approval.

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- not recommend or suggest that anyone else buy, sell or deal in the securities of any company, while having inside information about the company
- not trade in the shares of companies when the Worker has access to inside information that, if made public, could reasonably be expected to affect that company's share price.

8. PRIVACY

Powerlink remains committed to only collecting, using, disclosing and retaining personal information that is necessary to meet business requirements, in accordance with the Australian Privacy Principles (APPs) and the Commonwealth *Privacy Act 1988* and the *Human Rights Act 2019*.

'Personal information' is regarded as information or opinion about an identified individual, or an individual who can be readily identified from such information. Examples include name, address, date of birth, telephone number, Tax File Number and bank account details.

Powerlink's Privacy Officer holds delegated authority in relation to privacy and Right to Information (RTI) decision making (currently General Manager Governance).

When performing work on behalf of Powerlink, Workers must adhere to the requirements relating to the collection, storage, use and disclosure of personal information as contained within the *Powerlink Information Classification and Handling Standard* and *Privacy Standard*. Powerlink respects Worker's personal information and privacy and expects Workers to respect the personal information and privacy of others.

If a Worker is aware of any actual or suspected violations or risks to personal information it must be reported as soon as possible to a Powerlink Leader.

Workers will:

- comply with all legal requirements that apply to the collection, use, disclosure and retention of personal information.
- only collect, use, disclose and retain personal information that is necessary for legitimate activities and functions.
- use personal information in a way that is consistent and compatible with the purpose for which it was collected, unless otherwise approved by the relevant individual.
- utilise safeguards to help protect personal information against risks such as loss or destruction or unauthorised access, or the use, modification or disclosure of personal information.
- maintain the accuracy of personal information.
- not access personal information unless they have appropriate approval and a clear business need to do so.
- not provide personal information to anyone inside or outside of Powerlink without proper approval.

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9. GIFTS, BENEFITS AND ENTERTAINMENT

9.1 Business Entertainment

On occasions it will be appropriate for Powerlink to offer entertainment and hospitality to corporate customers, Workers and key stakeholders. As a Government Owned Corporation, Powerlink and its Workers need to be transparent and accountable for such expenditure.

Corporate entertainment and hospitality occurs when meals and/or entertainment is provided that is more than light meals/refreshments associated with a Powerlink business related activity.

Approval for expenditure on corporate entertainment and hospitality will in most instances need to be obtained in advance. Guidance on activities which constitute entertainment can be found in Powerlink's *Corporate Entertainment and Hospitality Policy*, along with details on limits and approval requirements.

Wherever expenditure on corporate entertainment and hospitality occurs, supporting documentation must be obtained and retained for tax and reporting purposes.

9.2 Receiving and Giving of Gifts and Donations

Accepting gifts from contractors and suppliers may be a legitimate way of building good business relationships, however as a Government Owned Corporation Powerlink does not encourage the receiving of gifts, as this could lead to the creation of a Conflict of Interest. Workers must never accept a gift or benefit if it is possible that this may influence their decision making, the way in which their job is performed, or cause others to perceive that there has been improper influence.

Token gifts, such as chocolates, a bottle of wine, diaries and souvenirs are generally acceptable provided they are not accepted from the same source on a regular basis.

If offered a gift with a value greater than \$100, the Worker must advise their Powerlink Leader and submit a *Reportable Gifts Declaration* to the relevant General Manager or Chief Financial Officer for assessment.

'Reportable gifts' include all externally provided gifts of items or property, gifts of travel, entertainment, hospitality, or any other benefit with a value greater than \$100.

A Powerlink Leader must be informed immediately if a substantial gift or benefit is offered in an attempt to influence the Worker's decision making.

When giving gifts or donations, prior approval from the Chief Executive will be required for any donation of services, materials, or money (other than approved Powerlink gifts) to external persons, institutions, organisations or charities where the value of the gift or benefit exceeds the limits set out in Powerlink's *Compliance Manual*.

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Further guidance surrounding the giving of gifts and donations can be found in Powerlink's *Compliance Manual*.

Workers will:

- declare and record any gift offered and accepted with a value greater than \$100
- clearly articulate Powerlink's requirements on accepting gifts at the beginning of new business relationships, especially where cultural norms may be different from those outlined in the Code
- assess the potential for a Conflict of Interest when accepting gifts
- be prepared to decline politely any offer not in line with Powerlink's standards
- regard gifts received through an intermediary as being the same as those given directly
- not request a gift of any kind from a supplier, customer or other party. This includes both direct requests and giving the impression that the offer of a gift or hospitality would be appropriate or desirable
- not retain a gift over \$100 without obtaining approval
- not receive gifts or favours in return for business services, or information, or a business advantage
- not accept gifts, not designed to further a valid business purpose or relationship.

10. USE OF COMPANY RESOURCES

Powerlink's resources exist in various forms and include physical and non-physical resources including but not limited to facilities, equipment, information, data, and a Worker's time at work. Each Worker has an obligation to protect Powerlink's resources and to use them honestly, economically, efficiently and for their intended purpose.

Union delegates may use Powerlink resources in the performance of their role as delegate, as outlined within the applicable Powerlink Enterprise Agreement.

The use of Powerlink equipment, materials or other resources for private reasons is generally not permitted unless prior approval is obtained from the relevant Powerlink Leader. Within reason, a limited amount of personal use of telephones, photocopiers and computers is acceptable, provided this does not interfere with work, and is not connected with a second job, or any private business interests i.e. anything where a profit may be made via the use of Powerlink resources.

Powerlink resources are not to be used for any offensive, obscene, illegal or otherwise inappropriate purposes (e.g. online / internet gambling), and Powerlink will not be responsible for any such acts committed using Powerlink assets.

Powerlink's internet and email systems are to be used in accordance with the Powerlink *Digital Technology Usage Standard*.

In addition to the above, Powerlink Corporate Credit Cards must only be used for genuine work related expenses in accordance with the Powerlink *Purchasing Card & Expense Reimbursement Procedure*.

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Workers will:

- use Powerlink resources responsibly, economically and for their intended purpose.
- protect Powerlink's resources from waste, damage, misuse, loss, fraud or theft.
- prevent non-authorised personnel from accessing Powerlink facilities, information, data or other assets where possible, and report immediately any use of resources where there is a suspected breach.
- not use Powerlink resources for personal gain.
- not enter into any fraudulent or illegal transactions involving Powerlink's resources.
- not permit unauthorised entry to a Powerlink site or office, or access to Powerlink's information technology.
- not deliberately access, store, send, post or publish inappropriate material, or ignore others doing so.
- not use Powerlink resources for secondary employment or private business interests.

11. MAKING A COMPLAINT

Where a Worker believes or suspects a breach of this Code, they should raise their concern in one of the following ways:

- directly with the individual, if appropriate, and where the Worker feels comfortable to do so.
- with their Powerlink Leader.
- with their one up manager if in relation to their Powerlink Leader.
- with their Senior People & Culture Business Partner or a member of the Employee Relations team.
- if a worker wishes to stay anonymous, they may contact an integrity hotline, which provides a confidential way for Workers to report concerns (free call 1800 490 708 or email powerlinkqldhotline@pkf.com.au).

The process for making a complaint is set out in the *Employee Complaints Procedure* and the *Complaints Management Framework*.

Workers may seek additional support from Powerlink's Employee Assistance Program and/or the Health and Wellbeing team.

12. VICTIMISATION AND VILIFICATION

Powerlink does not permit or condone any form of victimisation or vilification. Complaints of alleged victimisation and vilification will be dealt with under the *Employee Complaints Procedure*.

Retaliation against employees who report Sexual Harassment or participate in incident reviews is strictly prohibited. In line with legal and organisational requirements, we are committed to a psychologically safe workplace where concerns can be raised without fear of reprisal. Any retaliation will be dealt with under the *Employee Complaints Procedure*.

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13. CONSEQUENCES OF A BREACH

Powerlink is committed to the standards and principles outlined in this Code. The Code is designed to attract the highest level of confidence from Workers, shareholders, customers and suppliers. It is also there to protect Workers by providing guidelines on expected standards of behaviour.

Any breach of the Code will be managed in accordance with the *Counselling and Discipline Procedure*. Breaches of the Code may result in disciplinary action, up to and including termination of employment.

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