Western Power's Code of Conduct

5 June 2018
Introduction

Western Power’s vision is to deliver on the changing electricity needs of Western Australians, powered by community trust and the passion of our people. Central to this vision is trust, which is built on the values of ethical, responsible and professional behaviours.

This Code of Conduct (Code) has been established in accordance with the Electricity Corporations Act 2005 (WA) (Act), as a central guide to support day to day decision making undertaken within Western Power. It sets the standards and fundamental principles for appropriate ethical, responsible and professional behaviours of our Personnel.

Western Power endeavours to remain transparent with all stakeholders in relation to the manner in which we conduct our business by making this Code available to the public through our website.

Management strives to ensure that this Code is observed in word and in spirit by all who represent Western Power.

Who does this Code apply to?

This Code applies to all Western Power Personnel, including:

- Every employee, officer and director of Western Power
- Every embedded contractor
- Every other contractor (and their sub-contractors) contractually bound to apply the Code when performing activities on behalf of Western Power.

Western Power views all Personnel to whom this Code applies as ambassadors of the business, and expects that those individuals represent and promote Western Power in a positive and professional manner.

A reference to ‘we’ and ‘our’ in this Code is a reference to each and every member of Personnel.

If any employee or contractor is uncertain about the application of any aspect of this Code, they should seek immediate clarification from either their formal leader, the Corporate Compliance area or their contract manager.

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1 Contractors (and their sub-contractors) are excluded from complying with the Conflict of Interest Standard, however are expected to manage conflicts in a manner consistent with this Code of Conduct

Observing the Code of Conduct

You and all Personnel have an accountability and responsibility for understanding and complying with the principles stated within this Code - Compliance with this Code is mandatory.

Our Principles

Western Power seeks to maintain the highest ethical standards and professional conduct in both our internal interactions with each other and when representing the organisation to our stakeholders, our customers and the wider community.

As such, at all times we are expected to act consistently with the following principles:

1. We act with honesty, integrity and fairness and are accountable for our actions and decisions
2. We comply with laws, regulations and our policies
3. We act within our delegated authority
4. We put safety first, and are respectful of the environment
5. We identify and manage conflicts of interest
6. We respect, safeguard and do not misuse Western Power assets
7. We ensure privacy and confidentiality of information and accurately maintain records
8. We embrace diversity and treat others with respect.

We act with honesty, integrity and fairness and are accountable for our actions

In performing our duties, honesty, integrity and fairness should guide all of our decisions in order to ensure Western Power’s reputation is maintained, and the corporation remains a trusted service provider to the community.

We are expected to act in a professional manner by:

- dealing fairly with all of our colleagues, customers, suppliers and stakeholders
- performing our duties with care and diligence
- making business decisions in a fair, impartial and prompt manner, giving consideration to all available information and applicable compliance obligations
- being accountable for our decisions and actions
- putting Western Power’s interests before our own personal interests (including a personal business and other external employment interest)
• abstaining from taking actions that compromise Western Power’s name, reputation, legitimate interests and business objectives
• ensuring business relationships are maintained in a manner consistent with the principles and philosophies contained within this Code.

We comply with laws, regulations and our policies

We respect and observe all applicable laws and all Western Power corporate policies.

You and all Personnel must comply with and follow all lawful directions given by, and must refrain from hindering or obstructing, an officer who is acting in an official capacity pursuant to legislation.

You may contact Western Power’s Legal Services or Corporate Compliance areas for specific guidance, before any action or decision is undertaken, where you are uncertain as to the application or interpretation of laws or company policy.

For further details on the laws applicable to Western Power and for a list of the current Western Power policy documents, refer to the online compliance register and policy register accessible via the GRID.

Public Interest Disclosure
Western Power will support and protect anyone who makes a ‘public interest disclosure’ (PID).

A PID is a disclosure of information that indicates past, present or future wrongdoing by Western Power (including by its Personnel) whilst in the performance of its public functions. You can, at any time, make a public interest disclosure to one of Western Power’s PID Officers.

Fraud, corruption and other illegal activity
Western Power has zero tolerance for illegal behaviour or practices. We seek to prevent and detect fraud and corruption through the use of appropriate internal controls. Additionally, investigative techniques may be used by Western Power to determine whether misconduct is occurring or has occurred. For further information see Western Power’s Fraud and Corruption Control Plan and Standard.

You must disclose to your formal leader, a Public Interest Disclosure Officer (PID Officer), a Forensic Specialist, contract manager or the Corporate Compliance Manager any illegal behaviour (such as theft, fraud, corruption, conspiracy and maladministration) that comes to your attention.

Formal leaders that become aware of any illegal behaviour must report it to a Forensic Specialist, the Corporate Compliance Manager or a PID Officer.

Where appropriate, Western Power will refer illegal behaviour to law enforcement agencies.

We act within our delegated authority

Western Power’s Board has approved a Delegated Financial Authority Policy and Authority to Execute Documents which authorise prescribed Personnel to undertake various activities on behalf of the business. You have a responsibility to understand and act within any limits of any authority delegated to your position and any relevant associated company policy. In particular, when engaging with suppliers and contractors, you must be aware of and comply with Western Power’s Procurement Policy and Conflict of Interest Standard.

If you are uncertain as to the application of the Delegated Financial Authority, Authority to Execute Documents or corporate policies, you must seek clarification from your formal leader or the Corporate Compliance or Financial Accounting areas.

We put safety first and are respectful of the environment

We put safety first by respecting and taking care of each other, our community and the environment. We choose safety – if it’s not safe we don’t do it. We believe that everyone who works for us has the right to return home from work free from injury and harm. We also understand that this goes beyond physical safety, and covers overall health and wellness.

Our Personnel are expected to take responsibility for safety in the workplace by speaking up and stopping work where they have determined it is unsafe to proceed.

You are responsible for ensuring you are fit for work when you attend the workplace. Western Power has set mandatory requirements for drug and alcohol to ensure we can perform our work in a safe and competent manner.

2 Legislation, regulations, codes of practice, and Australian or other standards incorporated into legislation.

3 All policies and supporting frameworks, standards, guidelines and work instructions.
Western Power is committed to protecting the environment in the conduct of its operations. Our Personnel are expected to minimise environmental impact, preserve biodiversity, prevent pollution, promote the efficient use of electricity and resources and reduce waste and emissions. When conducting our activities, Western Power will cooperate with Government, local residents and traditional owners to ensure relevant environmental issues are addressed.

You have an obligation to comply with all environment, health and safety legislation, Western Power’s Safety, Health and Environment Policy, and all associated health and safety systems, frameworks, standards and procedures.

Contractors (and their sub-contractors) must implement their own safety, health and environment management systems (and associated documentation), which meet or exceed Western Power’s minimum standards.

**We identify and manage conflicts of interest**

**Conflicts of interest**
Our personal interests should not conflict with our duties and obligations to Western Power and we must not allow any actual, potential or perceived conflict of interest to affect our operations, decisions or reputation.

Western Power’s Conflict of Interest Standard and Conflict of Interest Procedure describes what an actual, potential and perceived conflict of interest is, in addition to outlining the process as to how and when they must be disclosed and managed by you.

**Gifts and hospitality**
We will not seek, offer or accept any gifts, benefits or hospitality that fall outside the Gifts rules established by the organisation. To do so may create an actual, potential or perceived conflict of interest, which can undermine Western Power’s reputation and business effectiveness. It may also expose Western Power and/or you to legal action and possible criminal charges.

Western Power’s Conflict of Interest Standard provides more information on what to do if a gift, benefit or hospitality is offered. A gift or hospitality may be accepted by you only in accordance with Western Power’s Conflict of Interest Standard. Where a gift does not meet the requirements of that Standard, they must be declined.

Western Power prohibits, and you must not be involved in, the giving or receipt of facilitation payments.

**Political involvement**
Western Power does not directly or indirectly participate in party politics nor make payments to political parties or individual politicians. Western Power does not seek to restrict you from participating in the political process if you are acting in your personal capacity as a private citizen. However, where that participation creates an actual or perceived conflict of interest to your duty to Western Power, you must manage that conflict in accordance with Western Power’s Conflict of Interest Standard.

**We respect, safeguard and do not misuse Western Power assets**

Personnel must use Western Power assets, including funds, tools and equipment, in an authorised, efficient and appropriate way, and only for business purposes.

This includes:
- preventing the misuse of assets and information
- controlling and securing assets and information appropriately
- avoiding extravagance or wastefulness
- complying with the Western Power Travel Guideline
- applying commercial principles when purchasing and disposing of assets
- adhering to the Procurement Policy
- reporting damage and losses immediately.

**Information technology**
We must use Western Power Information and Communication Technology (ICT) assets and facilities for business purposes and ensure that personal use is minimised in accordance with the Information and Communication Policy. ICT assets and facilities provided by Western Power must be used responsibly, appropriately and ethically.

You must keep confidential all access details to your Western Power ICT accounts and various programs and files, and not manipulate, interfere with or access unauthorised computer systems.

Inappropriate use of ICT assets is regarded as misconduct, and will be dealt with accordingly. Western Power reserves the right to monitor and block the use of the internet, email and other electronic resources at any time to the extent permitted by legislation.

**Use of social media & other networks**
Western Power recognises that you may interact with various forms of social media in your personal capacity,
such as Facebook, YouTube, Twitter, and other sites where you can publish or exchange information and messages with others.

Posting on external social media in the name, or on behalf, of Western Power may only be conducted by you if you have the express authority to do so pursuant to the Communications Policy and Social Media Guidelines.

Western Power also promotes the use of internal social networking tools, such as Yammer, for business purposes. We must ensure we act within the principles of this Code, particularly those involving diversity and treating others with respect, in all such communications and interactions.

When using social media in your personal capacity you must not:
- compromise your productivity or effectiveness at work
- imply or suggest that Western Power endorses or supports your views
- disclose confidential information without express authority
- bring Western Power into disrepute.

**We ensure privacy and confidentiality of information and accurately maintain records**

The accuracy, use and handling of information is critical to Western Power’s integrity and reputation, and achieving our vision.

To protect information, reports and other data, you must ensure that:
- all records made in the course of employment with Western Power are saved in the appropriate record management system in line with the Records Management Standard, ensuring that only those Personnel authorised to use or access sensitive or confidential information in the course of their role at Western Power are given permissions to access that information
- all records are accurate in their description and purpose, and no false or misleading records are created or maintained
- personal information is accurate, complete, up to date
- the confidentiality and privacy of information about Western Power, its customers and employees is respected and maintained
- sensitive or confidential information is securely stored
- appropriate confidentiality of information is maintained after ceasing to have a relationship, working or otherwise, with Western Power
- we will only release information externally where legislation permits or requires it
- information is used only for the purposes required as part of designated Western Power duties
- confidential information that is not publicly available is not used for private gain or advantage of others
- the government is provided with timely, accurate and well-considered information and policy advice.

**External communications and official information**

To maintain Western Power’s integrity and corporate reputation, we recognise the importance of communicating accurate and consistent information.

In particular, only appropriately authorised Personnel may communicate with the media, key stakeholders (including the Minister for Energy), regulators and customers in relation to matters that relate to Western Power. You should familiarise yourself with the requirements of Western Power’s Communications Policy and the frameworks, standards and protocols that underpin that policy.

**We embrace diversity and treat others with respect**

Western Power recognises and embraces the diversity among its people and members of the public. We seek to understand, are accepting of, and have respect for all cultures and related heritage. All forms of bullying, discrimination, harassment and victimisation are prohibited. We will not unlawfully discriminate on the grounds of:
- gender
- marital status
- sexual orientation
- pregnancy
- race or ethnic origin
- religious beliefs
- political beliefs
- disability
- family responsibilities
- family status
- age
- an employee or a member of the public raising a concern or making a complaint.

You must apply these principles in all dealings with work colleagues or any persons who you engage with in the performance of your role at Western Power. Western Power also promotes the use of appropriate terminology, representations and protocols when acknowledging Aboriginal and Torres Strait Islander
people. Further guidance can be found in the Equity and Diversity Standard for further details.

Electricity Corporations Act and the role of Directors

The Electricity Corporations Act 2005 (WA) (Act) contains specific duties and obligations that are applicable to directors, officers and employees of Western Power. The principles outlined in this Code are in addition to these specific statutory duties and obligations. Where there is a conflict between the Act and this Code, the Act prevails to the extent of any inconsistency.

The Board has established the Guide to Directors’ and Executive Officers’ Obligations & Responsibilities, which outlines expected behaviours that assist directors and executive officers in the successful discharge of fiduciary and other duties.

Consequences of breaching this Code

All Personnel have the responsibility to report to their formal leader (or Board Chair in the case of a non-executive director) every breach of this Code, or any matter of serious concern, that they are aware of.

In the case of contractors (and their sub-contractors) performing activities on behalf of Western Power, breaches of this Code should be reported through to the relevant contract manager.

Personnel who breach this Code or any of the policies, guidelines or procedures made under it, or Personnel who authorise or permit any breach by a subordinate, may be subject to disciplinary action, including dismissal.

Accountabilities

Policy content owner

The content owner of this Code, in conjunction with the head of Governance, Risk & Compliance, is accountable for:
• providing refresher training on the content of the Code on an annual basis
• monitoring the continuing relevance and currency of this Code to Western Power
• publishing the approved version of this Code in Western Power’s corporate policies register.

Formal leaders

Every Formal Leader within Western Power is accountable for ensuring that all Personnel in their areas of responsibility are aware of and are provided with appropriate education on each of their obligations under this Code. Formal leaders are also required to report breaches of this Code to Corporate Compliance.

Head of Human Resources

The Head of Human Resources is accountable for:
• in consultation with Corporate Compliance, assigning Code of Conduct induction training to new members of Western Power Personnel
• administering disciplinary and remedial actions in respect to breaches of this Code.

Document control

Review

This Code will be reviewed and evaluated by the Board at least once in every three year period taking into account the purpose of the Code and the outcome of the compliance review.

Content Owner

General Counsel

Related Documents

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<td>Assurance and Risk Policy</td>
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<td>Communications Policy</td>
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<td>Conflict of Interest Procedure</td>
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<td>Conflict of Interest Standard</td>
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<td>Delegated Financial Authority</td>
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<td>Equity and Diversity Standard</td>
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<td>Financial Management Policy</td>
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<td>Fraud and Corruption Control Plan</td>
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<td>Guide to director’s and executive officer’s duties &amp; responsibilities</td>
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<td>Travel Guideline</td>
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**Approval history**

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