

# Aurora Energy's Code of Conduct

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- Ensure that Aurora assets and resources are only used for proper business purposes.
- Recognise the value and effectively utilise the diversity of our people.
- Demonstrate our care for the environment in the way we work.

# Aurora's Code of Conduct

Under the Code all people working at Aurora commit to:

1. Work safely and in accordance with the law;
2. Treat customers, the public and fellow workers with honesty, courtesy and respect;
3. Perform our duties with professionalism, integrity and efficiency;
4. Ensure our personal business and financial interests do not conflict with our duty to Aurora;
5. Ensure the security and privacy of all confidential information received in the course of our work;
6. Ensure we do not misuse our position;
7. Ensure that Aurora assets and resources are only used for proper business purposes;
8. Recognise, value and effectively utilise the diversity among our people; and
9. Demonstrate our care for the environment in the way we work.

## What is the Code of Conduct?

This Code sets the standard of behaviour for working at Aurora. It is a statement of what is acceptable behaviour and must be followed by everyone at Aurora Energy.

It reflects Aurora's commitment to the highest standards of honesty and integrity in meeting the needs of our external and internal customers, stakeholders and the wider community.

## What are the key elements?

Under the Code all people working at Aurora commit to:

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3. Perform our duties with professionalism, integrity and efficiency;
4. Ensure our personal business and financial interests do not conflict with our duty to Aurora;
5. Ensure the security and privacy of all confidential information received in the course of our work;
6. Ensure we do not misuse our position;
7. Ensure that Aurora assets and resources are only used for proper business purposes;
8. Recognise, value and effectively utilise the diversity among our people; and
9. Demonstrate our care for the environment in the way we work.

## Who does the Code Apply To?

This Code applies to anyone who is employed by or works at Aurora including workers, (both permanent and temporary), contractors and consultants.

The Code is a Policy of Aurora and all workers and contractors are required to comply with Aurora's policies and procedures. This ensures that Aurora approaches situations in a consistent and correct way each time they arise.

**Current Aurora Policies and Procedures are located on The Volt.**

As workers, it is our responsibility to be aware of these policies and how they impact upon our work. If you are unsure about where to locate these policies or what they mean, you should talk to your Manager or Team Leader.

## **When Does The Code Apply?**

The Code applies whenever workers, consultants or contractors are carrying out work for Aurora or are identified as representatives of Aurora. In some circumstances this will include times when workers, consultants or contractors are outside their immediate workplace or working hours, for example at work functions, out of hours work activities or even when they are out in the community on behalf of Aurora.

## **What Will Happen If I Breach The Code?**

Failure to comply with the Code will be considered a breach of Aurora policy and will be dealt with in accordance with our disciplinary policy, the consequences can vary from a verbal warning to termination of employment for serious breaches.

## **What if I think someone else has breached the Code ?**

If you believe another person has breached the Code you should inform your Manager, the Company Secretary or the People & Culture Division.

If you wish to you can report a breach under Aurora's Public Interest Disclosure (Whistleblowers) Policy, which protects you from adverse outcomes of your disclosure. Please refer to that Policy for more information.

## **How Can I Be Sure My Conduct Complies With The Code?**

While the Code provides general guidance and minimum expectations regarding your conduct, no code can ever cover every conceivable circumstance you may be faced while working at Aurora.

In all you do, you are expected to listen to and act upon your conscience to help build and maintain Aurora's reputation as a company.

If you find yourself in a situation where you are unclear as to the correct action, it is worthwhile considering the following:

- Discuss the situation with other people in your workplace to get an objective viewpoint;
- Consider what you would do if it was your money, time or equipment;
- Imagine changing places and being on the receiving end of your decision or action;
- Evaluate whether you could adequately defend your actions to your manager or team leader;
- Consider the potential consequences of your behaviour or action for your colleagues, family, customers and wider community including whether you would feel comfortable with it reported in the media; and
- Think about who will benefit – will it be fair to Aurora, the customer and yourself.

If you still have doubts about the correct thing to do, you should refer the matter to your team leader or manager for advice.

### **Who Can Support Me In Complying With The Code?**

If you need more information or are unsure about Aurora's expectations of you under the Code, we encourage you to speak with your team leader or manager. The People & Culture and Governance Divisions can also provide assistance where necessary. The Company Secretary is the owner of the Code of Conduct.

### **How Does Aurora Ensure The Code Is Applied Across The Workforce?**

The Company Secretary is responsible for ongoing review and development of the Code of Conduct. The Governance and People & Culture Divisions work to ensure the Code is communicated to everyone who works at or for Aurora.

On commencement of employment at Aurora, and every 12 months afterwards, every person who is employed by or works for Aurora must complete the Code of Conduct Declaration to demonstrate that they understand the principles of the Code, to confirm that they have complied with the Code in the previous 12 months and to agree to comply with it going forward.

# 1. Work safely and in accordance with the law

Aurora is subject to State and Federal laws. We are required to act within those laws.

No one can be directed to carry out an illegal act, and no one can justify an illegal act by claiming to be acting under the order of a manager, or to be simply complying with policy.

Aurora is committed to providing its workers with a work environment that is healthy and safe. This will only be achieved if all workers, consultants and contractors recognise that a safe workplace is everyone's responsibility. To this end we fully comply with and enforce all occupational health and safety legislation, regulations, Aurora rules and practices.

We will demonstrate this by:

- Complying with the Non-Negotiable safety rules;
- Intervening in at-risk situations (i.e. where there is risk of harm to people, property or the environment);
- Carrying out our duties in a safe manner in accordance with relevant policies, standards and work practices;
- Ensuring our team members are trained and competent to undertake their work activities;
- Ensuring plant and equipment is maintained in a safe condition for use;
- Using equipment for the purpose it was intended; and
- Actively reporting all health and safety incidents / issues, including near-hits.

Personal safety and the safety of others in the workplace will never be compromised. Nothing is more important.

All workers are responsible for their own and others safety and must understand Aurora's safety systems. Full participation in safety training and education activities as requested by your Manager is required.

We will work safely by looking after ourselves, our workmates, customers and members of the community to ensure that our actions do not adversely impact their health, safety or wellbeing.

## **2. Treat customers, the public and fellow workers with honesty, courtesy and respect**

We will be truthful and considerate of others when carrying out our work. We will do what we said we would do. We will treat all people with respect

## **3. Perform our duties with professionalism, integrity and efficiency**

We work together as a team and always apply due care and diligence in everything we do, use appropriate language and behaviour and work co-operatively together to achieve Aurora's goals and the needs of our customers. We will act with integrity by being truthful, fair and honest.

We must always take responsibility for our actions and be accountable for the consequences, and we will not tolerate dishonest behaviour by our colleagues or customers.

## 4. Ensure our personal, business and financial interests do not conflict with our Aurora's interests or our duty to Aurora

At all times we will support a positive image of Aurora, through the things we do and say and the perception created by the things we do and say.

### Conflicts of Duty or Interest

We have a general obligation to avoid conflicts of interest or duty - this means we will not take on personal business or financial interests that compete or conflict with Aurora's interests or our duty to Aurora.

We will ensure that our personal, business or financial interests and those of our immediate family do not influence, or might be perceived to influence, the objective performance of our duties and responsibilities to Aurora.

If an Aurora employee or contractor or their immediate family has a real or perceived conflict of interest or duty no matter how small, they will declare it to their Manager as soon as they become aware of it, and their Manager will determine how it is best managed.

Aurora workers and contractors must not be involved in any commercial dealings on behalf of Aurora where they have a real or perceived conflict of interest or duty, unless the full nature of the conflict has been disclosed to their Manager, and the Manager has approved the involvement.

Where necessary workers will make written declarations to confirm whether they have a conflict of interest or duty on appointment to a role and otherwise to enable Aurora to confirm there are no conflicts of interest or duty prior to a particular task commencing.

### **Gifts, Favours or Entertainment**

We will not solicit, accept or offer money, gifts, favours or entertainment which might influence, or might be perceived to influence, our work judgment. The way we will demonstrate this will include:

- Not accepting or offering money or items readily exchanged for money under any circumstances;
- Not giving or accepting gifts, favours or entertainment where there are current or immediately pending commercial outcomes which we are likely to, or might be perceived to be, involved in or have influence over; and
- Not accepting gifts, favours or entertainment in any other circumstances unless it is valued at less than \$250 or has been discussed with our Manager, and we will ask our Manager when we are unclear on what to do.

### **Public comment**

We will ensure that comments made by us in our personal capacity in public forums, including to media and via social media, are seen as personal comments and are not related to our position or work at Aurora.

### **Other work**

Employees and contractors will not undertake work outside Aurora without first gaining approval from their Manager. We must refuse outside work if it conflicts with the business Aurora is in or interferes with our capacity to work effectively.

## 5. Ensure security and privacy of all confidential information received in the course of our work

We must maintain the privacy of business information and protect it from disclosure. Much of our information relates to customers, who expect, on both legal and ethical grounds, that this information be protected.

We must treat as confidential, information in relation to Aurora's business affairs and those of our customers, colleagues and business associates.

We must comply with laws in relation to the use and disclosure of information, including privacy laws and the terms of our contracts and agreements. We must only access and use information for authorised work related purposes and not in a manner detrimental to the interests of Aurora, its customers, or other workers and contractors.

Aurora employees, consultants and contractors, must not use Aurora information for personal gain, or the gain of others such as friends, relatives or business associates.

Aurora's records must be created, saved, secured, retained and destroyed as required by Aurora's Information Management Policy.

Aurora employees, consultants and contractors must maintain Aurora's confidentiality even after ceasing work for the Aurora Group, and before ceasing work must return any information in their possession.

## 6. Ensure we do not misuse our Position

We will not use our position, title or authority at Aurora to benefit us or others personally, or to coerce or induce such a benefit.

We will not misuse Aurora time. This includes our own time as well as the time of someone who works with us.

## 7. Ensure that Aurora assets and resources are only used for proper business purposes

We all share the responsibility for looking after Aurora assets, whether it be funds, information or property, especially if it is under our control. Aurora assets must not be removed without authorisation or used for personal benefit or any improper use.

Aurora's property, no matter how old or damaged, may only be given away, lent, destroyed or otherwise disposed of, if this action is in accordance with Aurora's asset use policies and is properly authorised.

Every worker who has control of Aurora funds and property is personally accountable for them. 'Funds' can mean cash or valuables such as company purchasing cards.

## 8. Recognise, value and effectively utilise the diversity among our people

The phrase 'diversity among our people' recognises that individuals within our workforce differ. They have a wide range of skills and experiences. Having a diverse workforce means that Aurora is a more effective organisation as these different skills and experiences help us to better meet the needs of our diverse customer base.

As a result of this, Aurora is committed to equity and diversity in the workplace. Discrimination or harassment in relation to anyone we work with or deal with will not be tolerated.

## 9. Demonstrate our care for the environment in the way we work

We are all responsible for maintaining and improving the environment by working in a sustainable way. We can do this by:

- Complying with environmental legislation;
- Making full and proper use of materials, encouraging recycling and avoiding waste; and
- Considering environmental factors in the development and implementation of new processes.