

# Supplier Code of Conduct

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[energyaustralia.com.au](http://energyaustralia.com.au)



**EnergyAustralia**  
LIGHT THE WAY

# 1. Introduction

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At EnergyAustralia there are three overarching values we hold that are important in everything we do:



Our customers  
are our priority.



Do the  
right thing.



Lead  
change.

It is important to us that the people and businesses we work with share our values, and this Supplier Code of Conduct sets out our expectations for suppliers in the areas of legal compliance, ethics and business conduct, respect for people, responsible environmental stewardship, care for communities and customers, and privacy.

EnergyAustralia expects all our suppliers to read, understand and ensure that their business, suppliers and subcontractors meets these standards, understand and comply with this Code.

By supplier, EnergyAustralia means any entity that supplies goods or services to EnergyAustralia Holdings Limited, its wholly owned subsidiaries and controlled entities.

## 2. Legal Compliance

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Our Suppliers (including their suppliers and subcontractors) must comply with the laws and regulations of the jurisdictions in which they operate, and exported products must comply with laws in force in destination countries.

## 3. Ethics and Business Conduct

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At EnergyAustralia, we act with honesty and integrity and don't make or receive improper payments, benefits or gains. Suppliers must act ethically and be honest, transparent and trustworthy in all their dealings with others.

EnergyAustralia expects decisions throughout the supply chain to be made without perceived or actual conflicts of interest.

### Bribery and Corruption

Suppliers must comply with applicable anti-bribery and anti-corruption laws, and must have adequate policies and procedures in place to monitor compliance with such laws.

EnergyAustralia strictly prohibits bribes, pay-offs, "facilitation payments" (payments to speed up routine actions), secret, unjustified or inflated commissions, kickbacks and any like payments or improper benefits, whether directly or indirectly, no matter how large or small in value.

This includes payments to or from any person (including public officials, foreign officials, foreign political parties or candidate for foreign political office) for the purpose of assisting a party to obtain or retain business for or with, or to direct business to, any person. This applies even if it is legal or common practice in a country.

EnergyAustralia will not tolerate bribery, corruption, and anti-competitive behaviour.

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## **Responsible Sourcing of Minerals and Commodities**

Suppliers are expected to exercise due diligence to reasonably assure that minerals and commodities in the products it manufacturers or trades, does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuse.

Suppliers shall not directly or indirectly support organisations and individuals associated with illegal activities, human rights abuses or terrorism.

## **IP and Fair Competition**

Suppliers shall respect intellectual property rights of EnergyAustralia and other third parties. Any transfer of technology and knowhow must be handled in a manner that protects intellectual property rights.

Suppliers must conduct their business in full compliance with anti-trust and fair competition laws, and disclose information regarding business activities, structure, financial situation and performance in accordance with applicable laws.

## **Sanctions and Trade Controls**

Suppliers must comply with all applicable laws and regulations relating to sanctions, export, re-export, import and trade controls.

## 4. Respect for People

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### Safety and Health

We expect our Suppliers to provide and maintain working environments and systems of work for their workers that are safe and free of risks to health insofar as it reasonably practicable. Their business priorities should empower workers to make safety and health an integral part of all work activities.

Our Suppliers should strive for continuous improvement in their standard of safety and health, with the goal of preventing work-related illness, injury and disease at all work locations.

### Non-discrimination

Suppliers must not engage in or support discrimination in hiring and employment practices on any grounds not relevant to the position or employment.

This includes discrimination based on gender, age, religion, ethnicity, race, cultural background, disability, physical features, marital relationship status, sexual orientation, gender identity and expression, pregnancy or potential pregnancy, family responsibilities, criminal record not relevant to the position or employment, political beliefs, industrial activity, union membership or any other characteristic that is not relevant to the position or employment.

### Bullying, Harassment and Disciplinary Practices

Suppliers must not use violence, threats of violence or other forms of physical coercion or harassment. Corporal punishment, mental, physical or verbal abuse, sexual harassment or sexual abuse, and harsh or inhumane treatment are prohibited.

Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

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## **Wages and Benefits**

Suppliers must comply with applicable laws relating to wages and benefits (including minimum wages, overtime pay, and piece rates).

Suppliers must not use deductions from wages as a disciplinary measure and must pay workers in a timely manner. Other deductions for accommodation, meals, transport of personal protective equipment should not exceed minimum costs.

## **Working Hours**

Suppliers must not require workers to exceed prevailing local work hours. In line with International Labour Organisation (ILO) standards, workers shall not be required to work more than 60 hours per week (including overtime), except in extraordinary business circumstances with their consent. Employees should be allowed at least one day off per seven-day week. Overtime shall be compensated at the prevailing overtime rates.

## **Forced and Compulsory Labour**

Suppliers must not use any form of forced, bonded, compulsory labour (including involuntary prison labour), slavery or human trafficking. Suppliers must not require workers to surrender any government issued identification, passport or work permit or other personal document as a condition of employment. Workers shall not be required to pay employers' or agents' recruitment or any other fee for their employment.

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## Child and Underage Labour

Child labour is strictly prohibited. The minimum age for employment or work is the higher of: 15 years of age, or the minimum age for legal employment in the relevant country. This Code does not prohibit participation in workplace apprenticeship programs or light work as defined by the ILO. Children under the age of 18 shall not be employed for any hazardous work and are restricted from night or unsupervised work. Work shall not interfere with children's or young worker's education or be harmful to their mental, social or moral development.

## Freedom of association and collective bargaining

Suppliers are expected to freely allow workers to associate with others, form and join (or refrain from joining) industrial organisations or associations of their choice and bargain collectively, or engage in any lawful industrial activity without interference, discrimination, retaliation or harassment.

# 5. Responsible Environmental Stewardship

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We expect our Suppliers to be committed to efficient use and conservation of resources. Our Suppliers should dispose waste and manage all key environmental impacts in a responsible manner.

We expect our Suppliers to consider the impact of their business activities on the environment and comply with all environmental laws, standards and codes to prevent pollution and ensure resource efficiency. Suppliers are expected to monitor environmental performance, including waste management and energy consumption, with the aim of continuous improvement over time.

Suppliers must immediately cease work where there is a risk of environmental harm, notify us of any incidents which are notifiable under Environmental Law and provide us with an investigation report containing findings on the causes, preventative actions and implementation of investigation findings.

## 6. Care for Communities and Customers

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We place a high priority on the safety and wellbeing of our customers and the communities in which we live and operate. We are guided by our values; customers are our priority, do the right thing and lead change and our commitment to diversity and inclusion.

We comply with regulations that protect the rights of our customers and environmental standards around our operations. We invest beyond compliance in supporting the sustainability of our communities through our focus on social issues.

We are a member of The Energy Charter and [disclose annually](#) the progress our business is making in delivering change for customers and communities.

We expect our Suppliers to place similar importance on the safety and wellbeing of their customers and communities. Where possible, we will ask our Suppliers to help our customers adopt sustainable practices such as energy conservation.

## 7. Privacy

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EnergyAustralia's [Privacy Policy](#) outlines our privacy commitment and explains how we collect, use, disclose and protect our customers' personal information. Suppliers must apply adequate data privacy and security protection to protect the personal information of our customers and employees from unauthorised access, use and disclosure. Suppliers who collect, use, store or have access to our customers' personal information must have adequate processes and procedures in place to monitor compliance with applicable privacy laws and contractual privacy obligations with EnergyAustralia.

## 8. EnergyAustralia's Whistleblowing Service

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EnergyAustralia expects our suppliers to promote our values and high professional standards. To help meet this expectation, EnergyAustralia is committed to fostering an environment where our suppliers and sub-contractors can raise concerns about any actual or suspected breach of this code.

Suppliers, their current and former employees, and sub-contractors can raise concerns:

- Via an EnergyAustralia Executive or Head of a Business Unit
- In writing or verbally to Head of Group Internal Audit
  - Phone: 03 8628 1000
  - Mail: Level 33, 385 Bourke Street, Melbourne VIC 3000

If an employee or sub-contractor does not feel comfortable raising concerns through the channels above, a disclosure may be made to an independent third party via EnergyAustralia's Whistleblower service:

- Call: 1800 500 965
- Email: [faircall@kpmg.com.au](mailto:faircall@kpmg.com.au)
- Online form: <http://faircall.kpmg.com.au/>. This method does not permit two way communication unless the whistleblower provides contact details
- Mail: attn. FairCall Manager, PO Box H67, Australia Square 1213, Sydney
- Fax: (02) 9335 7466