STATEMENT OF BUSINESS ETHICS
Endeavour Energy values its strong business relationships with its many business partners. Underpinning our approach to the way we do business is a deep appreciation of the essential services we provide, and the essential assets we manage for our communities.

With this in mind we seek to foster business relationships with organisations that are committed to delivering the highest ethical standards of safety, respect for people, performance and integrity.

All Endeavour Energy directors, managers, employees, contractors and suppliers are expected to observe the law and abide by an ethical framework, as set out in our Code of Conduct, and in our policies and procedures.

This Statement of Business Ethics sets out the key business principles we apply in our dealings with our business partners. We expect our business partners to also apply these principles in their dealings with us.

Each principle is designed to form relationships that are fair, transparent and generate good value.

Endeavour Energy welcomes your contribution to our business success and in turn, looks forward to playing a part in yours.

Tony Narvaez
Chief Executive Officer
ABOUT US

Endeavour Energy is responsible for the safe and reliable supply of electricity to homes and businesses across Sydney’s Greater West, Blue Mountains, Southern Highlands and the Illawarra Region.

Our network is made up of more than 186 major electricity substations, 416,000 power poles and 32,000 smaller distribution substations that are bound together by 50,000 kilometres of underground and overhead power lines.

Procurement decisions are based on guiding principles so that we continue to deliver value for money solutions and remain accountable to our customers and shareholders. These principles are further explained in the Guiding Principles section of this Statement of Business Ethics.

OUR CODE OF CONDUCT

Our employees are expected to abide by our Code of Conduct.

Our Code of Conduct booklet is available at: www.endeavourenergy.com.au
Endeavour Energy employees are required to understand and support our corporate values. These five values and their associated behaviours are the basis for everything we do.

We expect that our business partners, suppliers and contractors will act according to these same values.

**Safety excellence**
- Put safety as your number one priority
- Do not participate in unsafe acts, and challenge unsafe behaviours
- Think before you act
- Lead by example
- Take responsibility for the health and safety of yourself and others.

**Respect for people**
- Treat all people with respect, dignity, fairness and equity
- Demonstrate co-operation, trust and support in the workplace
- Practise open, two-way communication.

**Customer and community focus**
- Deliver value and reliable service to our customers and communities
- Use resources responsibly and efficiently
- Be environmentally and socially responsible.

**Continuous improvement**
- Look for safer and better ways to do your job
- Improve our financial performance
- Support innovation to add value to our business.

**Act with integrity**
- Act honestly and ethically in everything you do
- Be accountable and own your actions
- Follow the rules and speak up.
GUIDING PRINCIPLES

In addition to reviewing supplier business practices in line with our corporate values, Endeavour Energy uses the following guiding principles when assessing suppliers’ proposals before awarding contracts:

SAFETY
Safety is Endeavour Energy’s number one priority. Working in a high risk industry means we must be vigilant about helping our employees, communities, contractors and suppliers remain safe during their work and dealings with us. We require our contractors and suppliers to have a similar commitment to health and safety.

VALUE FOR MONEY
Value for money does not always mean selecting the lowest price. Endeavour Energy will balance all relevant factors including ethical business practice, compliance with specifications, quality, whole-of-life costs (including disposal), reliability and timeliness when selecting suppliers.

OPEN, FAIR AND HONEST
Endeavour Energy operates as an open, fair and honest business partner. In this spirit, this booklet sets out what you can expect from us, what we expect of you, and the avenues for resolving any issues that may arise.
ENDEAVOUR ENERGY PROCUREMENT PROCESS

All procurement activities are conducted under strict policies and procedures.
We expect transparency by all stakeholders in the procurement cycle including:
• obtaining sources of supply
• obtaining quotations or proposals covering price, availability and capability from suppliers
• placing orders for goods and services
• receiving and accepting the goods and services
• authorising payments to suppliers.

In the interest of a fair and competitive marketplace we apply the same evaluation and selection process to all prospective suppliers.

Tenderlink is our electronic tendering solution. Endeavour Energy tenders are posted on: www.tenderlink.com/endeavourenergy

Further information on the Endeavour Energy procurement process can be found on: www.endeavourenergy.com.au
WHAT YOU CAN EXPECT FROM US

Endeavour Energy requires its tendering, contracting and purchasing policies, procedures and practices to reflect high standards of ethical conduct. Tendering includes requests for quotes/proposals/tenders, expressions of interest and requests for information.

HOW WE WILL ENGAGE YOU

• Goods and services are ordered using an approved method such as a purchase order
• If a contract is awarded, we will include information on the preferred ordering method. You should question any order that does not refer to a purchase order
• You may receive confidential or proprietary information in your dealings with us. This should not be released to other parties unless specifically authorised by Endeavour Energy.
WHAT WE EXPECT OF YOU

BE COMMITTED TO SAFETY

Being an Endeavour Energy supplier means that you are required to maintain compliance with the *Work Health and Safety Act 2011*, the *Work Health and Safety Regulations 2011* and any other relevant laws, regulations, codes or standards, as they relate to Endeavour Energy’s Network operation.

This means you must:

- demonstrate and maintain an outstanding and measurable safety record
- provide evidence of your safety excellence and a Health and Safety (H&S) management system
- advise us of H&S risks for activities undertaken for Endeavour Energy, and your methods for effectively managing them
- notify Endeavour Energy of any incidents and H&S performance issues associated with activities undertaken for Endeavour Energy
- adhere to Endeavour Energy’s alcohol and drugs policy which applies to all workers¹ on our sites. No worker is permitted to be impaired by the use of alcohol or illicit drugs while working on Endeavour Energy sites and all workers are subject to our drug and alcohol testing regime while on our sites
- maintain adequate insurance coverage including workers’ compensation, public liability, professional indemnity and motor vehicle as applicable.

ADHERE TO OUR CORPORATE VALUES

When doing business with or responding to a tender from Endeavour Energy we expect all suppliers, potential suppliers, contractors and potential contractors to operate in a manner that is in line with our corporate values.

This means that you must:

- follow our stated policies and procedures
- provide accurate and reliable information when required/requested
- declare conflicts of interest (actual, potential or perceived) as soon as you become aware of them
- act ethically, fairly and honestly in all dealings with Endeavour Energy
- take all reasonable measures to prevent the disclosure of confidential Endeavour Energy information
- help us prevent unethical practices in our business dealings
- treat Endeavour Energy employees and customers with respect.

¹A worker is an employee, contractor, supplier, trainee or volunteer.
WHAT WE EXPECT OF YOU (CONT.)

COMPLY WITH THE COMPETITION AND CONSUMER ACT 2010

The Competition and Consumer Act 2010 is in place to promote fair trading and competition.

In particular, you must:
• never discuss or reach an understanding or arrangement with a competitor about supplies, prices, terms, tenders, other competitors or other competitive factors
• never try to influence another supplier’s or competitor’s dealings with Endeavour Energy
• never offer bribes, gifts of cash (including gift cards), inducements, commissions or incentives to Endeavour Energy
• not take advantage of others’ disadvantage by acting unfairly or unconscionably
• not supply goods and services in a manner that contravenes the Competition and Consumer Act 2010 or other legislation
• not mislead or deceive through your advertising, predictions, opinions or other material that you either supply, or omit to supply us.

CONSEQUENCES FOR NOT COMPLYING

You should be aware of the consequences of not complying with Endeavour Energy’s ethical requirements when doing business with us.

Demonstrated wrongful conduct could lead to:
• termination of contracts
• loss of future work
• loss of reputation
• investigation for wrongful conduct
• matters being referred for criminal investigation.
GUIDANCE NOTES

GIFTS AND BENEFITS

Endeavour Energy encourages high levels of integrity in all its business operations. For this reason, it does not accept gifts or benefits (including invitations to events or hospitality) that could be seen to influence business decisions or obtain preferential treatment.

This means our employees are unable to accept any gift or benefit that they feel could influence the way they do their job. If a gift or benefit is accepted, it will be registered.

However, to ensure the integrity of our procurement processes, employees involved in a procurement evaluation or decision, or who work in the Procurement function cannot accept gifts.

You must never offer gifts of cash (including gift cards), bribes, inducements, commissions or incentives to Endeavour Energy employees; if you do, employees are required to immediately report this as a breach of the Statement of Business Ethics or our employee Code of Conduct.

You must immediately report any instance in which our employees seek a gift or benefit from you. See how to disclose possible wrongful conduct on page 13.

COMMUNICATION BETWEEN PARTIES

To minimise the risk of a perceived inappropriate influence being brought to bear on the business relationship, all communication should be clear, direct and accountable.

You are not permitted to discuss Endeavour Energy’s business or information publicly in the media, online or in any other publication or at any event without prior approval.

ENDEAVOUR ENERGY’S EMPLOYEES AND ASSETS

Endeavour Energy’s Code of Conduct addresses secondary employment. You must never try to engage Endeavour Energy’s employees to provide services to your organisation that would not normally be provided under the agreement by which you are operating.

The same is true for Endeavour Energy’s assets. Inappropriate or unapproved use of any of Endeavour Energy’s equipment may result in the termination of your services.
CONFLICTS OF INTEREST
Customers, suppliers and Endeavour Energy employees need to be confident that all decisions made by Endeavour Energy are impartial.

All Endeavour Energy employees are required to avoid conflicts of interest and to disclose any actual, perceived or potential conflicts of interest. Endeavour Energy extends this requirement to its suppliers. Some examples of conflicts of interest are:

- knowing that an Endeavour Energy employee (or their friends or relatives) stand to benefit from a matter in which you are involved
- having a personal relationship with an Endeavour Energy employee that goes beyond a normal professional working relationship
- using business information that you have acquired through your work with Endeavour Energy for personal gain
- engaging in party political activities or making adverse political comments that relate to Endeavour Energy’s business.

CONFIDENTIALITY
Endeavour Energy expects each of its suppliers to take all reasonable steps to protect any confidential information received, unless required to disclose it by law.

CONTRACTORS
All contractors and subcontractors are required to comply with this Statement of Business Ethics. If you engage subcontractors in your work for Endeavour Energy, you must make them aware of this Statement of Business Ethics.

INTELLECTUAL PROPERTY RIGHTS
In business relationships with or for Endeavour Energy, parties will respect each other’s intellectual property rights and will formally negotiate any access, licence or use of intellectual property.
WHO TO CONTACT

QUESTIONS ABOUT THIS STATEMENT OF BUSINESS ETHICS
For additional information about this Statement of Business Ethics or Endeavour Energy’s procurement process, please call 131 081 or (02) 9853 6666 and ask to speak with the Manager Procurement & Logistics.

REPORTING POSSIBLE WRONGFUL CONDUCT
If you wish to provide information about suspected wrongful conduct please contact Endeavour Energy directly, as set out below.

Instances of wrongful conduct includes, but is not limited to, corrupt activities, fraud, discrimination, breaches of Endeavour Energy’s Code of Conduct, and breaches of the Corporations Act 2001 (Cth). If you honestly believe on reasonable grounds wrongful conduct has occurred, it can be reported in any of the following ways:

• By phone: Ethics Hotline 1800 384 427
• By e-mail: ethics@endeavourenergy.com.au
• Via Your Call (external and independent service provider):
  – Telephone Hotline: 1300 790 228
  – Email: endnrg@yourcall.com.au
  – Locked Mail Bag: Mail Bag 7777, Malvern VIC 3144 Australia
  – If you have a hearing or speech impairment, visit www.relayservice.gov.au and request Your Call’s hotline.
• By letter: Manager of Internal Audit
  Endeavour Energy
  PO Box 811
  Seven Hills NSW 1730

Whistleblower protection
If you voluntarily make a report about wrongful conduct, you will not be at risk of suffering any form of reprisal or retaliation, provided that you act in good faith and are not engaged in serious misconduct or illegal conduct yourself. Under the Corporations Act 2001 (Cth), the disclosure of information relating to wrongful conduct qualifies for certain protections where the prescribed reporting criteria have been met.

Anyone who knowingly makes a false report/disclosure of wrongful conduct, or who otherwise fails to act in good faith in respect of the report may not be afforded the protections under the Corporations Act 2001 (Cth).
Additional copies of this Statement of Business Ethics booklet may be obtained via our website or by phoning (02) 9853 4319.

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