



Code of Conduct

April 2024

*Owned by the
people of WA*

HORIZON
POWER

The Horizon Power Code of Conduct sets the standard of ethical and professional behaviour expected of all employees, directors and contractors.

The code describes the fundamental values which underpin Horizon Power's business relationships.

Horizon Power is owned by the People of Western Australia. Accordingly, from an integrity perspective, compliance with the code is essential and expectation is that all staff to whom the code applies, act in accordance with it.

Horizon Power acknowledges the First Peoples of the land upon which we gather and do work across Western Australia. We recognise and appreciate a continued connection through stories, traditions and living cultures and commit to building a brighter future together.

Stephanie Unwin

Horizon Power Chief Executive Officer



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1. The Code of Conduct, Our Horizon Way



Horizon Power makes the Code of Conduct accessible to all our people and the general public. The Code of Conduct is discussed during induction sessions and formal leaders are responsible for spending time going through the Code of Conduct with their staff.

Should employees or contractors have questions about the Code of Conduct, they should seek immediate clarification from their formal leader. Members of the general public can seek clarification through our Call Centre on 1800 267 926.

Where legal concerns arise, the formal leader will seek legal advice before any action or decision is taken.

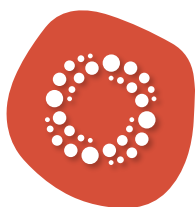
We uphold the following Horizon Power values, as set out in Our Horizon Way, and use them as guiding principles in our conduct and working relationships.

The values are:

- Safety
- Integrity
- Team
- Customer

Reinforcing and enhancing the culture of the business forms an integral part of our performance management approach and our people are assessed on expected behaviours.

Our Horizon Way



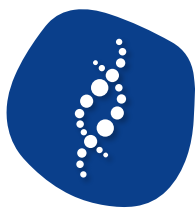
Safety

We look after each other and our communities.



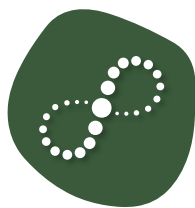
Team

We openly collaborate on solutions and achieve shared goals.



Integrity

We do the right thing and build trusted relationships.



Customer

We partner with customers to deliver improved and sustainable choices.

2. Manage and monitor the business





Horizon Power's employees, contractors and consultants are required to:

- comply with all applicable legislation, laws, standards, codes and related Horizon Power policies and procedures, including all policies set out in Horizon Power's Corporate Policies Register (**Policies Register**); and
- act in accordance with Horizon Power's values, as set out in Our Horizon Way.

A link to the Policies Register is available on the Governance page on the Legal & Risk page in Powerlink.

2.1 Who does the Code of Conduct apply to?

The Code of Conduct applies to all of Horizon Power's employees, directors and Type A¹ and Type B² contractors. It is expected that Type A and Type B contractors will abide by Horizon Power's Code of Conduct while engaged with Horizon Power.

Horizon Power views all persons to whom this Code of Conduct applies as ambassadors of the business and expects that those individuals represent and promote Horizon Power in a positive manner.

1 - A Type A contractor is a contractor filling an approved FTE position that would otherwise be performed by an employee directly engaged under Horizon Power employment conditions.

2 - A Type B contractor is a contractor who is performing work that is temporary in nature, of a defined scope and timeframe.

2.2 Accountable and ethical conduct

We uphold the highest ethical standards and professional conduct consistent with the principles of merit, equity and probity. Stealing, misappropriation, misconduct, fraud, corrupt conduct and illegal practices are not accepted at Horizon Power. Fraud is a dishonest activity that causes actual or potential financial loss to any person or organisation. Corrupt conduct occurs when a person uses or attempts to use their position for personal advantage or to cause detriment to others.

Our relationships are maintained in a manner consistent with the principles of:

- Respect for others
- Integrity and fairness
- Taking responsibility for our own actions and being accountable for the consequences
- Acting honestly, cooperatively and being trustworthy

- Understanding, acceptance of and respect for Aboriginal and Torres Strait Islander culture and heritage and non-Aboriginal and non-Torres Strait Islander culture and heritage
- Upholding a positive image of Horizon Power
- Compliance with legislative and regulatory obligations
- Avoidance of any actions that compromise Horizon Power's legitimate interests and business objectives
- Awareness of personal and professional life relationships in social media channels and avoiding acting in a way which could be seen as making statements on behalf of Horizon Power.

2.3 Compliance with the law and policies

We respect and observe all applicable laws and regulations, follow all lawful directions and adhere to all policies set out in the Policies Register. Key legislation, standards and regulations we operate by include, but are not limited to, the following:

- *Electricity Corporations Act 2005 (WA)*
- *Government Trading Enterprise Act 2023 (WA)*
- *Electricity Industry Act 2004 (WA)*
- *Public Interest Disclosure Act 2003 (WA)*
- *Environmental Protection Act 1986 (WA)*
- *Competition and Consumer Act 2010 (Cth)*
- *Corruption, Crime and Misconduct Act 2003 (WA)*
- *Commonwealth Criminal Code Act 1995 (WA)*
- *Equal Opportunity Act 1984 (WA)*
- *Fair Work Act 2009 (Cth)*
- *Work Health and Safety Act 2020 (WA); and*
- *Western Australian Public Sector Commissioner's*

2.4 Consequences of breaching the Code of Conduct

Consequences of a breach of the Code of Conduct are contained within underlying policies, procedures, regulations and other legislation. Such consequences may result in disciplinary action such as verbal or written warnings, suspension or dismissal. In addition, breaches of regulatory or legislative provisions may result in other penalties, such as fines and/or imprisonment.

Fair and just principles will be used in determining consequences as a result of a breach of the Code of Conduct.

2.5 Reporting and investigating breaches of the Code of Conduct

You are responsible for reporting any alleged breach, or any matter of concern that may breach the Code of Conduct, to your formal leader.

It is mandatory that any suspected/alleged breach involving:

- collusion;
- dishonesty; or
- misuse of company funds, assets or information (including the suppression of information),

be reported immediately to your formal leader, who must in turn inform the Risk and Audit Manager and the General Counsel and Company Secretary. If you feel unable to discuss a suspected/alleged breach with your formal leader or are unhappy with the formal leader or manager's response, then it should be raised with the General Counsel and Company Secretary or in accordance with our Public Interest Disclosure Policy (see below).

Once an alleged breach is reported it will be reviewed and investigated. Individuals reporting an alleged breach will be advised of the outcome.

The full protection of the Board of Horizon Power will be afforded in relation to the reporting and to anyone who reports alleged misconduct or a breach of the Code of Conduct.

2.6 Public interest disclosures

Horizon Power is committed to supporting and protecting individuals that make disclosures and providing protection to those who are the subject of a disclosure.

Public Interest Disclosure (**PID**) Officers are the Risk and Audit Specialist, the Risk and Audit Manager, the

Senior Manager People and Capability and the General Counsel and Company Secretary.

Anyone thinking of making a disclosure should speak with one of Horizon Power's PID Officers (noted above).

In order to be protected under the *Public Interest Disclosure Act 2003 (WA)*, the disclosure must be made to a proper authority (that is, one of Horizon Power's PID Officers or a proper authority named under the *Public Interest Disclosure Act 2003 (WA)*).



Additional guidance

Public Interest Disclosure Policy

2.7 Misconduct

Misconduct is defined in section 4 of the *Corruption, Crime and Misconduct Act 2003 (WA)* and includes minor and serious misconduct.

Serious misconduct is conduct by a public officer who:

- acts corruptly or corruptly fails to act in the course of their duties; or
- corruptly takes advantage of their office or employment to obtain a benefit or to cause a detriment to any person; or
- acting in the course of their duties or while deliberately creating the appearance of acting in the course of their duties, commits an offence punishable by two or more years imprisonment.

Corrupt conduct tends to show a deliberate intent for an improper purpose or an improper motivation. Corrupt conduct may involve an exercise of a public power or function but for private benefit. It may involve conduct such as the deliberate failure to perform the functions of office properly, or the exercise of a power or duty for an improper purpose.

Minor misconduct is conduct by a public officer that:

- adversely affects the honest or impartial performance of the functions of a public authority or public officer, whether or not the public officer was acting in their official capacity at the time of engaging in the conduct;
- involves the performance of functions in a manner that is not honest or impartial;
- involves a breach of the trust placed in the public officer; or
- involves the misuse of information or material that is in connection with their functions as a public officer, whether the misuse is for the benefit of

the public officer or the benefit or detriment of another person; and

- constitutes, or could constitute, a disciplinary offence providing reasonable grounds for termination of a person's office or employment.

All misconduct or suspicion of misconduct must be reported immediately to your formal leader, who must in turn inform the Risk and Audit Manager and the General Counsel and Company Secretary. Under the *Corruption, Crime and Misconduct Act 2003* (WA), it is the responsibility of the Chief Executive of Horizon Power to notify:

- the Public Sector Commission of minor misconduct or a suspicion of minor misconduct; and
- the Corruption and Crime Commission of serious misconduct or a suspicion of serious misconduct.

If you feel unable to discuss an issue of misconduct or suspicion of misconduct with your formal leader or are unhappy with the formal leader or manager's response, then it should be raised directly with the General Counsel and Company Secretary or via our Public Interest Disclosure Policy.

Minor misconduct may also be reported directly to the Public Sector Commission and serious misconduct may be reported directly to the Corruption and Crime Commission by members of staff or the public.

2.8 Managing risk

The Horizon Power Board and Executive are responsible to have in place systems and processes to identify and manage risk. We are all responsible for the overall control and mitigation of risks to the corporate risk appetite. We all have a responsibility to identify, evaluate, manage and report risks to a formal leader, manager or to the Risk and Audit Manager.

Additional guidance

Risk Management Policy
Risk Management Framework
Anti-Bribery and Corruption Policy

2.9 Act within delegated authority

The Horizon Power Board delegates its power

to enter into transactions to people who occupy particular positions within Horizon Power.

The powers are delegated according to the liability which Horizon Power assumes. The delegation arrangements allow for the smooth and efficient running of Horizon Power.

We act within the limits of delegated authority as delineated in legislation and company policy.

Additional guidance

Authorities and Delegations Policy
Authorities and Delegations Manual

2.10 Financial management

Adherence to Horizon Power's financial policies and procedures are mandatory for the sound financial management and proper accountability of income, expenditure, assets, liabilities and shareholder funds. Horizon Power's officers, Executive, management and staff are responsible for proper conduct and adherence to their relevant level of financial authority and application of policies and procedures for the sound financial management of Horizon Power.

Additional guidance

Accounting and Tax Policy
Corporate Budgeting Policy
Cost of Capital Policy
Authorities and Delegations Policy
Authorities and Delegations Manual

2.11 Conflict of interest

We do not allow actual, perceived or potential conflicts of interest to affect Horizon Power operations.

A conflict of interest may exist whenever a staff member is in a situation where their personal interests (being those interests existing outside of the relevant individual's engagement with Horizon Power) actually or potentially conflict, or could be perceived to conflict, with their obligations to Horizon Power and/or the requirements of their position. This includes situations where the interests of a Horizon Power staff member conflicts with a duty towards a customer or the public.

Should an actual, potential or perceived conflict of interest arise, the procedures set out in the Conflicts of Interest Policy must be followed.



Additional guidance

Conflict of Interest Policy

2.12 Gifts

Unacceptable Gifts

We do not seek, offer or accept any payments, hospitality, gifts, benefits, favours or entertainment (collectively, **Gift**):

- beyond what is reasonable and comparable to that which Horizon Power provides to business customers or is legitimate business practice;
- which could be, or could be seen to be, conditional, incentive or reward for preferential treatment; or
- which are not in line with the general expectations of the communities Horizon Power serves.

The test in determining whether acceptance of a Gift is appropriate should be measured on its own merits and circumstance, taking into account the above. If a Gift is offered that could be considered by others as improper or conditional, as a reward for preferential treatment or as outside of normal or legitimate business practice, the offer of the Gift must be declined, reported to your formal leader and registered within the Gift Register as a non-approved Gift in the manner described below. Examples of such Gifts include excessively expensive Gifts (such as golf clubs, jewellery,

watches, mobile phones, tablet personal computers, business or first class air fares or holidays) and/or Gifts offered by a tenderer in respect of a tender process.

Gifts that may be accepted

As a guide, in circumstances where it is reasonable for an individual to accept a Gift, individuals may accept standard items or entertainment comparable to that which the organisation provides to its business customers and clients, such as a luncheon or hospitality events.

Gift approval and recording requirements

If a Gift exceeds the value of \$100, employees and Type A and Type B contractors are required to obtain the prior approval of their formal leader before accepting the Gift and, register the Gift (and its approximate value, date of receipt, the name of the company providing the Gift and the name of the formal leader who provided prior approval) in the Gift Register (maintained by the General Counsel and Company Secretary) by submitting a Gift Register application via the Gift Register App.

The Chief Executive Officer (**CEO**) and directors (other than the Chairperson) must obtain the prior approval of the Chairperson before accepting:

- a Gift (other than hospitality or entertainment) that exceeds \$100 in value; and
- hospitality (including meals and beverages) and entertainment (including cultural or sporting events) that exceeds \$200 in value,

and, register the Gift (and its approximate value, date of receipt, the name of the company providing the Gift and the name of the person who provided prior approval) in the Gift Register by sending an email to: gift.register@horizonpower.com.au. Before accepting a Gift (other than hospitality and entertainment) in excess of \$100 in value or hospitality (including meals and beverages) and entertainment (including cultural or sporting events) in excess of \$200 in value, the Chairperson must obtain the prior approval of either the CEO or the General Counsel and Company Secretary and then register the Gift in the Gift Register in the manner described above, by sending an email to: gift.register@horizonpower.com.au.

Further guidance

- **Prizes:** Any prize won by an individual attending an event on behalf of Horizon Power, in circumstances where Horizon Power paid for the individual to attend the event, will be treated as the property of Horizon Power and not that of

the relevant individual. However, if an individual purchases a raffle ticket at such an event with their own money and subsequently wins a prize, they are entitled to keep that prize.

- **Team Gifts:** In the case of a Gift exceeding \$100 in value provided to a team as opposed to an individual (for example, a hamper), the most senior member of the team that received the Gift must follow the approval and registration process outlined above in the same way as if the Gift had been offered to them personally.
- **Where the Gift value is unknown:** In regard to Gifts comprising hospitality or entertainment where the actual cost of the hospitality or entertainment is not known at the time of accepting the invitation (for example, an invitation to a restaurant meal), a registration in the Gift Register is required where the approximate value of the hospitality or entertainment divided by the number of attendees is likely to exceed \$100 (or \$200 in the case of the CEO and the directors).

If approval is declined, the Gift must not be accepted by the relevant individual and returned to the provider or refused in the case of hospitality or entertainment. In these circumstances, a registration of the declined Gift will be recorded in the Gift Register, including the approximate value of the Gift, the date it was offered, the name of the company who made the offer, the name of the formal leader who declined approval and the reasons why prior approval was not obtained.

- **Gifts provided to family members:** A person engaged by Horizon Power must not allow any family member, friend or personal associate to receive any Gift from a third party where that third party provides the Gift by virtue of the engaged person's connection with Horizon Power, unless approved by an Executive General Manager or the CEO. Approval or non-approval of such Gifts must also be registered in the Gift Register in the manner described above.
- **Cash or cash equivalent Gifts:** Accepting a Gift comprising cash or an item which is easily convertible to cash (such as shares, cheques or money cards) is never acceptable and must be reported immediately to the affected individual's formal leader and registered in the Gift Register

as a non-approved Gift in the manner described above.

- **Frequent Flyer Programs:** Membership of airline frequent flyer programs is a private matter. Frequent flyer points earned by individuals in connection with business related travel will accrue to them as a private entitlement.
- **Allowable Gifts that are refused:** Offers of Gifts that are not improper or conditional or outside of normal or legitimate business practice, but are nevertheless refused by the relevant employee, director, Type A or Type B contractor without being submitted for formal leader approval, do not need to be registered in the Gift Register.
- **Offering Gifts outside of Horizon Power:** Individuals must not offer Gifts to entities outside of Horizon Power without the prior written approval of the individuals' formal leaders.
- **Gift audit:** The Risk and Audit Function will undertake a two-yearly review of the Gift Register and report its findings to the Audit and Risk Management Committee as part of its internal audit plan.

Additional guidance

Gift Register App – send gift or hospitality applications via the Gift Register App (except in the case of the Chief Executive Officer or directors of Horizon Power who must send gift or hospitality registration emails to gift.register@horizonpower.com.au)

Conflicts of Interest Policy

3. Managing our people



We want Horizon Power to be known as a company that is respected for delivery and recognises talented and high performing people with potential to create opportunity and rewards. To achieve this requires us to recruit, develop and retain talented high performing employees that are motivated and who share our vision, values and organisational culture.

3.1 Our people

Horizon Power is committed to:

- quality recruitment practices;
- a competitive remuneration framework;
- leave entitlements in accordance with prevailing legal obligations and agreements and flexibility on when leave may be taken; and
- maintaining fair and just principles.

We support and develop our people by:

- cultivating a safe, supportive and cohesive work environment;
- taking into account the different locations that our people live and work in;
- providing study assistance for permanent employees;
- providing training and capability development programs and tools;
- providing opportunities for career development and progression; and
- rewarding and recognising individuals for outstanding service.

Horizon Power, in partnership with local Aboriginal and Torres Strait Islander people and communities, is committed to:

- ensuring Aboriginal and Torres Strait Islander people benefit from our work, including through the safe and reliable provision of power to regional and remote communities and community partnerships;
- raising employee awareness of Aboriginal and Torres Strait Islander histories and cultures;
- developing and implementing our Reconciliation Action Plan;
- meeting our Reconciliation Action Plan's commitments for Aboriginal and Torres Strait Islander employment and economic opportunities;

- initiatives to increase and support procurement opportunities for Aboriginal and Torres Strait Islander businesses;
- ensuring culturally supportive and safe environments for all Aboriginal and Torres Strait Islander people who access our services;
- creating culturally supportive and safe environments for Aboriginal and Torres Strait Islander employees; and
- celebrating the achievements and contributions of Aboriginal and Torres Strait Islander people.

Horizon Power is also committed to maintaining high standards of performance, conduct and behaviour throughout the business.



Additional guidance

Leave Policy

Rewards and Recognition Policy

3.2 Recruitment

Recruitment and selection will be undertaken on the basis of open and transparent processes based on the principles of:

- merit;
- free from conflict of interest; and
- increasing Aboriginal and Torres Strait Islander employment within our organisation.

Should any employee be concerned with a potential people management issue, they should raise this with their formal leader and/or General Manager or contact People and Capability.



Additional guidance

Recruitment and Selection Policy

3.3 Health and safety

Our health and safety objective is to minimise the risk of harm. The effective control of safety and health risks encountered by our employees, contractors and the public is paramount and central to everything we do.

Health and safety legal obligations are the minimum requirement in the establishment of our health and safety risk controls. Horizon Power will aim to exceed these obligations in the completion of our activities. We adhere to Horizon Power's health and safety policies, procedures and systems to reduce the risk of harm to our people, contractors and members of the public.

Additional guidance

Safety, Health and Wellbeing Policy

3.3.1 Fit for work

We are committed to creating a healthy and safe workplace. As part of this commitment, Horizon Power provides a strong focus on physical, mental and emotional health so that our people remain fit for work.

To do this Horizon Power:

- maintains appropriate health and fitness standards to enter the workforce and sustain fitness for work;
- prevents the inappropriate behaviour and harm that can be caused by the consumption of alcohol, illicit drugs and prescription medication through workplace risk mitigation;
- promotes physical, mental and emotional health so our people can safely undertake work;
- prevents and minimises the adverse effects of fatigue, work conditions and excessive hours at work; and
- encourages behaviour and attitudes that are conducive to a healthy and safe workplace.

Additional guidance

Safety, Health and Wellbeing Policy

3.3.2 Alcohol and drug management

Horizon Power is committed to promoting and managing a safe workplace by preventing or minimising the risk of harm associated with alcohol and illicit drugs consumption.

We must present for work free from the adverse effects of alcohol, drugs, prescription medication or other substances, ensuring that they do not present a health and safety risk.



Additional guidance

Safety, Health and Wellbeing Policy

3.4 Management of diversity

We recognise and value our people's diversity. All forms of discrimination and harassment are prohibited.

We do not unlawfully discriminate on the grounds of:

- age;
- family responsibility;
- family status;
- gender history;
- disability or impairment;
- marital status;
- political convictions;
- pregnancy;
- race;
- religious conviction;
- sex; or
- sexual orientation.

We promote community recognition and acceptance of the equality of men and women in the workplace.

We actively seek increased employment opportunities for Aboriginal Australians.

We apply these principles in all our dealings with work colleagues and all persons having contact with Horizon Power.

3.5 Respectful workplace behaviour

Horizon Power promotes a culture and environment of respectful workplace behaviour.

Harassment is unlawful and will not be tolerated. Harassment in this context includes sexual, racial, religious, and disability harassment.

Sexual harassment includes an unwelcome sexual advance or request for sexual favours or unwelcome conduct of a sexual nature. Racial or religious harassment occurs when a person is threatened, abused, insulted or taunted because of their race, religion, colour, descent, ethnic or national origin or nationality. Disability harassment occurs when a person is threatened, abused, insulted or taunted because of their disability.

Bullying is unacceptable at Horizon Power and can also be unlawful. Bullying comprises repeated, unreasonable or inappropriate behaviour directed towards an employee, or group of employees, that creates a risk to health and safety. At Horizon Power, when we talk about bullying we describe behaviour that is often (but not always) repeated, that:

- victimises;
- humiliates;
- undermines or threatens;
- poses a risk to mental or physical health, safety or wellbeing; or
- is detrimental to work or organisational performance. Harassing, discriminatory or bullying behaviour can be:
 - verbal;
 - written;
 - visual;
 - physical; or
 - psychological,

and relates to work activities both within and outside the workplace, including work related social activities.

Victimising someone who has made or been involved in a complaint made under the Code of Conduct may be a breach of the *Equal Opportunity Act* (1984).

4. Managing our external environment



We will create lasting value for our customers and stakeholders by engaging stakeholder groups in a professional manner and conducting our operations to minimise our impact on the environment. We strive to act with care and diligence and make decisions that are honest, impartial, timely and consider all relevant information.

4.1 Responsibility for the environment and heritage

We are committed to protecting the environment in the conduct of our operations. We work with Government, local residents and Traditional Owners so that relevant environmental and cultural heritage issues are addressed.

We comply with environmental legislation and make full and proper use of materials, recycling and avoiding waste.

We comply with all heritage legislation and work closely with regulatory bodies and Traditional Owners in the protection and promotion of cultural heritage values. Horizon Power is committed to avoiding impacting on Aboriginal Cultural Heritage whenever and wherever possible when undertaking our activities.

Additional guidance

Environmental Policy Statement
Aboriginal Cultural Heritage Management Policy

4.2 Communications and stakeholder management

We create lasting value for our customers and stakeholders and protect our corporate reputation by engaging all stakeholder groups in a professional and agile manner.

This is achieved by conducting ourselves with:

- consistency and transparency at all times;
- acting with integrity;
- listening to stakeholders;
- displaying strong leadership;
- employing leadership practices that are efficient, honest and open; and
- delivering quality services.

Individuals must advise the Manager Corporate Affairs and Communication of any matters that could impact on Horizon Power's corporate reputation, including corporate issues discussed on social media sites such as Facebook and Twitter.

Additional guidance

Communications Policy

4.3 Community partnership

Horizon Power recognises community partnerships are key to business success.

We are committed to programs that build the capacity and capability of the communities in which we operate and deliver opportunities to develop lasting value in regional Western Australia, including cultural community partnerships led by, or in partnership with Aboriginal and Torres Strait Islander staff/communities.

Additional guidance

Community Investment Program Policy
Conflicts of Interest Policy
Section 2.12 of this Code of Conduct

4.4 Service the customer

Our customer sales and billing procedures are performed in a consistent, approved, transparent and auditable manner.

Horizon Power:

- respects:
 - the privacy of customers' personal information; and
 - that due to financial and other hardships, customers are not always able to pay electricity accounts by their due date; and
- is committed to:
 - treating all customers with fairness, dignity and compassion recognising their interests, rights, safety and welfare; and
 - dealing with complaints in a professional, courteous, confidential and efficient manner.

Additional guidance

Customer Service Policy
Financial Hardship Policy

5. Manage our information and assets



Individuals must only use Horizon Power information and assets, including funds and equipment, for the benefit of Horizon Power and within the limits of their authority.

5.1 Intellectual property

Intellectual property refers to confidential information, and includes copyrights, designs, patents and trademarks.

Horizon Power records, protects and manages intellectual property assets to minimise the risk of non-compliance with prevailing intellectual property laws, regulations and obligations.

The intellectual property of Horizon Power, which may have been created by individuals during their employment, using Horizon Power resources, vests in and remains the intellectual property of, Horizon Power.



Additional guidance

Intellectual Property Policy

5.2 Information and knowledge management

The accuracy, use and handling of information is critical to Horizon Power's integrity and reputation. Correct record keeping improves transparency and accountability of decision making.

Individuals must:

- not make any false or misleading entries;
- respect confidentiality and observe the privacy of information about Horizon Power, its customers and fellow team members;
- identify and implement all confidentiality, integrity and availability safeguards;
- identify and securely handle personal data;
- disclose all relevant information;
- provide access to information to those authorised to use the information concerned;
- use information available to us solely for the purposes required as part of our designated Horizon Power duties;
- not use confidential information that is not publicly available, for our private gain or advantage or that of others;

- maintain appropriate confidentiality after ceasing a relationship, working or otherwise, with Horizon Power;
- properly protect information assets and fully exploit their value to Horizon Power; and
- seek advice about the appropriate release of information if you are unsure.

5.3 Company assets

Individuals must use Horizon Power assets, including funds and equipment, in an authorised, efficient and appropriate way. This includes:

- preventing misuse of assets and information;
- controlling and securing assets and information;
- exercising prudence when purchasing goods and/or services;
- applying proper commercial principles to the purchase and disposal of assets;
- adherence to Procurement policies and procedures; and
- reporting lost or damaged assets immediately.

5.4 Procurement

All procurement must be in accordance with the Procurement and Contract Management Policy and should follow the requirements outlined in that Policy.



Additional guidance

Procurement and Contract Management Policy

5.5 Use of credit cards

Corporate credit cards must only be used in accordance with the Corporate Credit Card Policy and Guidelines. The issuing of credit cards is managed within each division with approval required from the relevant formal leader and Executive General Manager.



Additional guidance

Corporate Credit Card Policy and Guidelines

5.6 Computers and IT facilities

Individuals must use IT facilities appropriately and abide by Horizon Power's Information Technology Policy and Guidelines.

Horizon Power reserves the right to monitor access or disclose internet usage, electronic messages or files of our people.

Practices and behaviours that put our IT systems and networks at risk are considered a breach of our IT policies. Individuals must take responsibility for their actions and shall be held personally accountable for the consequences of their actions.



Additional guidance

Information Technology Policy and Guidelines

5.7 Fleet vehicles

All fleet vehicle activities, including their allocation, usage, administration, procurement and management is conducted in a consistent and appropriate manner, in line with the prevailing legislation and corporate policies and guidelines.

All custodians are responsible for ensuring that the vehicle is maintained in accordance with the owner's manual and that the tyres are in good condition. Misuse, abuse or wilful damage of fleet vehicles will result in action to recover costs.

In the event your drivers' licence is suspended you must advise your formal leader immediately. You are expected to abide by conditions placed on your drivers' licence at all times.



Additional guidance

Fleet Policy and Framework

5.8 Travel

The regional nature of our business often requires us to travel. Travel encompasses overseas and domestic travel, meals and expenses. All travel decisions must consider safety and health implications, the benefit to the business and cost effectiveness.



Additional guidance

Travel Policy, Principles and Business Rules

6. Review of Code of Conduct



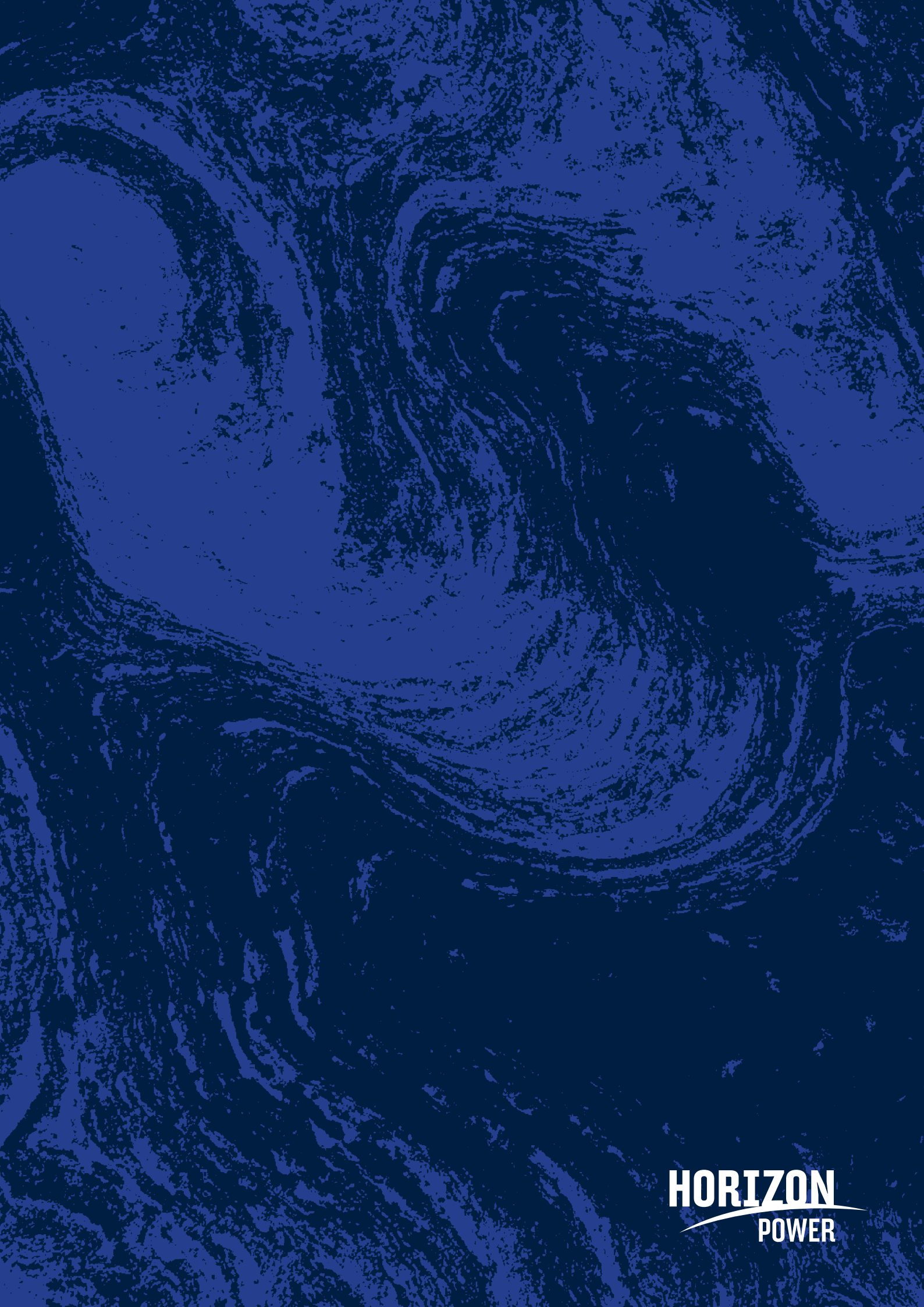
The Code of Conduct is reviewed at least every three years to provide currency, relevancy and consistency with legislation, regulations and Horizon Power's policies, operations, values and culture. The review process includes consultation with our people as well as the Public Sector Commissioner, as required by the *Electricity Corporations Act 2005* (WA).

APPROVED BY: Board of directors

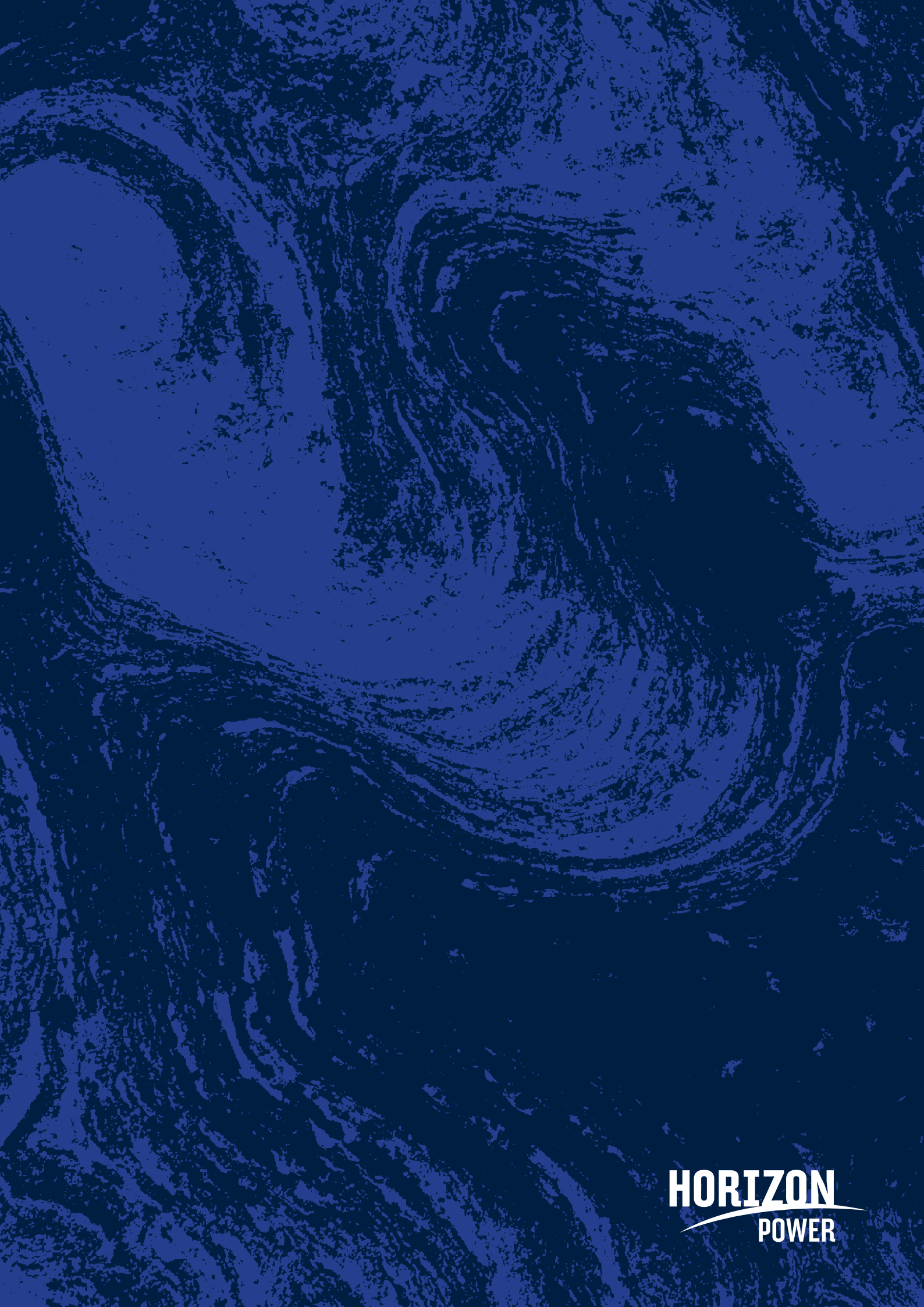
DATE: December 2023

RESPONSIBLE AREA: Legal and Risk Team

DATE OF NEXT REVIEW: December 2026



HORIZON
POWER



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