



BP8036 - Code of Conduct - Team Members

Document Owner	Chief Executive Officer
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Supporting Legislation	Anti-Money Laundering and Counter Terrorism Financing Act 2006 (Cth) Criminal Code 1995 (Cth) s.70 Fair Work Act 2009 (Cth) Modern Slavery Act 2018 (Cth) Public Sector Ethics Act 1994 (Qld) Information Privacy Act 2009 (Qld) Public Interest Disclosure Act 2010 (Qld) Work Health and Safety Act 2011 (Qld) United Nation's 2003 Convention Against Corruption
Supporting Documents	Fraud and Corruption Control Best Practice Guide , March 2018, QLD Crime and Corruption Commission BP8032 - Delegations of Authority Policy BP8042 - Conflicts of Interest Policy BP8043 - Public Interest Disclosure Policy BP8044 - Risk Management Policy BP11023 - Code of Conduct - Suppliers and Contractors OP8111 - Information Privacy Policy OP8135 - Media and Public Speaking Policy Pr8163 - Gifts and Benefits Procedure Pr8164 - Corporate Entertainment Procedure Pr8166 - Guide to the Code of Conduct for Team Members Pr9671 - Public Interest Disclosure Procedure Pr10611 - Procurement Guide F10627 - Conflict of Interest Declaration Form Related training: UWCOC2023 - Code of Conduct Module (UW) Unitywater's Modern Slavery Statement Unitywater's Modern Slavery Response Protocol (Pr11442)



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1. Introduction

Unitywater is a public sector entity as defined under the [Public Sector Ethics Act 1994 \(Qld\)](#). As a public sector entity, Unitywater is required to adopt a Code of Conduct which meets the requirements of the Act. The Team Member Code of Conduct outlines the expectations of conduct, values and behaviours for all Unitywater team members.

The Team Member Code of Conduct applies to:

- a. members of the Board
- b. members of the Executive Leadership Team
- c. all Unitywater leaders and employees
- d. all labour hire employees.

(Note above collectively referred to as “you”, “your” in this Code).

The requirements for Unitywater’s Suppliers and Contractors is outlined within Code of Conduct - Suppliers and Contractors ([BP11023](#)).

2. Purpose

Unitywater is committed to creating and maintaining an environment which is professional, responsive, safe and free from any form of unlawful or inappropriate behaviour for customers, clients, visitors, suppliers, contractors and team members.

3. Guiding Principles

The [Public Sector Ethics Act 1994 \(Qld\)](#) identifies four fundamental ethical principles to guide our conduct and behaviour of its team members. These four principles are:

- a. integrity and impartiality
- b. promoting the public good
- c. commitment to the system of Government
- d. accountability and transparency.

These principles, together with Unitywater’s corporate values, form the foundation of this Team Member Code of Conduct and establish the benchmark for our actions and decision-making. Unitywater leaders must help their team members comply with these standards, primarily by demonstrating the expected values and behaviours themselves, clearly communicating expectations and ensuring their team members have access to comprehensive training sessions and support tools.



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3.1 Expectations of Conduct

Principal 1: Integrity and Impartiality

In recognition of the public trust placed in Unitywater, you are required to:

- a. conduct business in observance of the highest ethical standards
- b. manage conflicts of interest with integrity and without prejudice
- c. uphold the law as well as Unitywater policies and procedures
- d. demonstrate a high standard of workplace behaviour and personal conduct
- e. demonstrate respect for other Unitywater employees, officer and stakeholder
- f. appropriately manage your engagement with external organisations
- g. appropriately moderate and restrict your contributions to public discussion forums.

Principal 2: Promoting the Public Good

To ensure a higher quality of outcome for Queensland residents, you are expected at all times to:

- a. provide a standard of excellence in service delivery
- b. ensure appropriate community engagement
- c. work as an integrated team member.

Principal 3: Commitment to the System of Government

To demonstrate respect for the Government and related institutions, you are expected at all times to:

- a. uphold the laws of the State and Commonwealth as it applies to you
- b. comply with all Unitywater decisions and policies.

Principal 4: Accountability and Transparency

To ensure Unitywater is accountable and transparent in its actions and decisions to its customers and the general public, you are expected at all times to:

- a. conduct your business dealings in a clear and transparent manner
- b. use or access Unitywater or public resources, property and funds efficiently and prudently, and only as necessary to conduct your approved Unitywater tasks
- c. use and disclose business information only as necessary to conduct your approved Unitywater tasks
- d. conduct accurate and regular record keeping
- e. ensure any potential conflict of interest is reported as necessary to Unitywater management
- f. commit to continuous self-improvement in your Unitywater work.



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4. Compliance with Unitywater Requirements

You are expected to comply with the requirements set out below. These are supported by related policy and/or practice documents, along with training programs where appropriate.

4.1 Anti-Bribery and Corruption

Unitywater does not condone or permit bribery or corruption in any form. As such, you are expected to:

- a. review and comply with all State and Commonwealth criminal legislation, as it applies to you
- b. conduct all business in an honest and ethical manner
- c. act professionally, fairly and with integrity in all business dealings and relationships;
- d. refrain from, making facilitation payments and inappropriate promises or giving gifts or excessive hospitality to contractors and suppliers, public officials or Unitywater team members for the purpose of obtaining unfair advantage or benefit
- e. refuse any bribe, facilitation payment, offer of employment or other financial or non-financial benefit which may impact your impartiality or the performance of your role
- f. attend mandatory training and awareness programs provided by Unitywater, as updated and approved by the Executive Manager People, Culture and Safety, from time to time, including but not limited to the following:
 - i. training on this Code, whether as included in the induction process or regular sessions on how to implement this policy
 - ii. any and all other training reasonably required by Unitywater from time to time; and
- g. immediately report any attempted bribery or corruption as described above using the approved Unitywater reporting systems, tools and practice directions
- h. ensure all procurement activities are conducted with integrity, transparency, and fairness, and refrain from any form of procurement fraud, including falsification of documents, improper influence, or manipulation of processes.



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4.2 Gifts and Benefits

To avoid bribery or corruption, Unitywater has a standing requirement that you refuse any gift or benefit from a supplier, contractor, tendering party, customer, Unitywater team member or party otherwise connected to your work, where acceptance of such a gift or benefit could:

- a. create an actual, potential or perceived conflict of interest, or
- b. otherwise compromise the impartiality or integrity of your performance in your conducting Unitywater work.

However, Unitywater recognises there are genuine instances of appreciation, good-will and thanks. As such, you are permitted to accept a gift or benefit received in connection with your role or work at Unitywater in the following circumstances:

- a. the gift or benefit has an estimated or actual retail value of less than \$100
- b. the gift or benefit is training and/or educational and will be of benefit to Unitywater as a whole
- c. the gift or benefit relates to corporate entertainment and complies with the Unitywater Corporate Entertainment Procedure ([Pr8164](#)), or
- d. otherwise, where the gift or benefit has been reported to the Senior Lawyer Governance and Compliance for risk assessment, approval and recording in the Gift and Benefit Register.

For further detail, refer to the Unitywater Gifts and Benefits Procedure ([Pr8163](#)).

4.3 Modern Slavery

Unitywater does not condone or permit discrimination, harassment, violations of privacy, slavery or servitude, restriction of free assembly or unfair employment practices. As such, you are required to be vigilant in identifying and reporting any behaviour you suspect may breach the Modern Slavery standards.

To assist you with doing this, you are expected to be familiar with Unitywater's Modern Slavery Statement and Modern Slavery Response Protocol (<https://www.unitywater.com/publications-reports>) and internal Policies and to review all training material provided to you on this topic.

4.4 Conflicts of Interest

If at any time you or your related parties have any interest, direct or indirect, in a Unitywater supplier, customer, competitor or contractor, then you should make prompt disclosure of the conflict and obtain Unitywater's approval to continue the relationship. This includes conducting any employment, contract or work with another company while you remain engaged by Unitywater. For further detail, refer to the Unitywater Conflict of Interest Policy ([BP8042](#)).



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4.5 Health, Safety and the Environment

Unitywater is committed to minimising incidents to people, whether its own customers and team members, suppliers and contractors or the general public, and to the environment.

You are expected to be proactively engaged in minimising such incidents by:

- a. reviewing and complying with all Unitywater workplace health and safety, environment and health related policies and work practice documents, as they relate to your work
- b. being aware of and taking reasonable steps to ensure your own safety and the safety, including psychological safety of your co-workers
- c. attend all health, safety and environment training and awareness programs provided by Unitywater, as updated and approved by the Executive Manager People, Culture and Safety, from time to time
- d. report any matters or incidents that are, or may cause, health, safety or environment breaches as soon as they come to your attention
- e. upholding legislative requirements, ensuring people are not subjected to coercion, inducements, or obstructions in their attempts to lawfully identify and raise WH&S hazards and risks, and report WH&S hazards and risks. This includes not misrepresenting WH&S concerns whilst they are being raised or after they have been reported.

4.6 Privacy

As a public entity, Unitywater is entrusted with the personal information of thousands of customers within its region, along with the personal information of its team members. Protection of personal information and privacy laws is imperative to Unitywater, and you are expected to:

- a. attend privacy training when offered by Unitywater, and comply with all State and Commonwealth privacy legislation, as it applies to you
- b. review and comply with Unitywater's Information Privacy Policy ([OP8111](#)), as it applies to you, in particular when you are viewing, accessing, storing, using or otherwise managing the personal information of Unitywater customers or other team members.

By accepting employment with Unitywater, you agree to consent to being filmed on any of our security or dashcam cameras as they are located on particular worksites, and for that footage to be collected, stored and used for safety and management purposes in accordance with Unitywater's Information Privacy Policy ([OP8111](#)).

4.7 General Requirements Under the Code

In order for Unitywater to conduct business with the highest of ethical and moral standards, you will:

- a. obey all relevant State and Commonwealth laws and regulations
- b. comply with the terms and obligations of your Unitywater employment contract
- c. treat all Unitywater team members and customers alike with dignity and respect
- d. treat all Unitywater contractors and suppliers with courtesy
- e. refrain from any acts of bullying, harassment, intimidation or abuse, whether verbal, physical, psychological or sexual
- f. ensure that public resources are not wasted, abused, carelessly damaged or lost, used improperly or applied extravagantly
- g. use social media responsibly and ensure you do not denigrate or cause harm to the reputation and standing of Unitywater.



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4.8 Familiarity and Compliance with this Code of Conduct

Unitywater team members are required to familiarise themselves and comply with this Code of Conduct and the associated Guide to the Code of Conduct for Team Members ([Pr8166](#)), which is accessible on the Unitywater Intranet. Unitywater will consider your performance in accordance with this Code when making employment, remunerative and other human resource decisions about you.

If you need assistance on how the Code applies to you, then please contact your Leader or Unitywater's People, Culture and Safety Business Unit.

Note: this document forms part of the learning content in uLearn module: UWCOC2023 - Code of Conduct Module (UW).

4.9 Reporting Breaches of this Code

Unitywater is committed to providing secure, confidential and accessible means concerns to be raised about breaches of this Policy. If you are concerned about an individual breaching any element of this Code, please contact your Leader, Branch Manager, HR or alternatively the Compliance Officer or General Counsel.

If you have more serious concerns relating to misconduct, improper state of affairs or circumstances, illegality or fraud, then you can advise Unitywater by email at integrity@unitywater.com. Such emails can be sent anonymously and may be protected under the QLD Public Interest Disclosure Legislation.

For more information about Public Interest Disclosures, see the Public Interest Disclosure Policy ([BP8043](#)) and Public Interest Disclosure Procedure ([Pr9671](#)).