

Group Our Ethics Policy

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Classification: Internal

Statement of Policy

Overview

Everything we do can have social, environmental and economic impacts. Our own success and sustainability as an organisation depends on not only what we do, but also how we do it.

It is for this reason, why it is so important we always work and act with integrity and comply with the applicable laws, regulations, codes, policies and procedures.

Our Ethics is a guide to help us do that.

Rationale & Scope

Our Ethics sets out the standards of conduct and behaviour that we would like every member of our workforce, including our extended network of partners, to embrace.

Application

Our Ethics applies to Australia Post Group and all of its workforce participants, who are defined as anyone who performs services for the Australia Post Group, or on its behalf, and includes:

- employees of any company in the Australia Post Group;
- contractors, consultants, licensees and agents (and their employees and subcontractors), who perform services for the Australia Post Group; and
- any other third parties performing services for or on behalf of the Australia Post Group.

The **Australia Post Group** means the Australian Postal Corporation, its subsidiaries, and all of its associated entities.

Audience

All of the Australia Post Group and its workforce participants.

Policy Principles

Australia Post Group's policy is to:

- inform all of our workforce participants of our ethical standards;
- recognise and promote the ethical and lawful behaviour we expect of our workforce participants – while actively demonstrating it ourselves;
- expect that Australia Post Group people leaders, as well as our licensees and principal contractors, will take steps to address any unethical behaviour as soon as they become aware of it;
- take action under our contracts with contractors, licensees to enforce ethical standards and deal with breaches; and
- refer suspected or alleged criminal behaviour to Australia Post Group Security.

Awareness, Training & Induction

Here are some of the things we will do to keep this policy top of mind:

- we make Our Ethics available on the intranet and display in hard copy around Australia Post Group workplaces;
- we provide training about your rights and responsibilities under Our Ethics; and
- we regularly remind you about your responsibilities under Our Ethics.

Enforcement & Monitoring

Records of team briefings and refresher training will be kept at a local level using local training records and/or by the Learning and Development team in the Learning Management System or equivalent system.

Breaches, Variations & Exemptions

Any behaviour that breaches Our Ethics will be managed through the applicable investigation and disciplinary processes. A proven breach by an employee of Australia Post or any of its subsidiaries may result in disciplinary action, up to and including termination.

Australia Post may take action under its contracts with contractors and licensees to enforce ethical standards and deal with breaches.

Reporting

All breaches that require investigation will be overseen by MyHR, Workplace Relations or an equivalent subsidiary contact. A centralised reporting system will also be kept by MyHR or an equivalent subsidiary contact.

Review

We'll review Our Ethics every three years, or whenever there is a change to the law, to make sure it's always up to date.

Our Ethics

Message from the Group CEO and MD

Dear Team,

At Australia Post we are fortunate enough to be one of nation's most widely-recognised and respected organisations. Although this is something we can all be genuinely proud of, it is a position that we should never take for granted.

Everything we do can have social, environmental and economic impacts. Our own success and sustainability as an organisation depends on not only what we do, but also how we do it.

It is for this reason, why it is so important we always work and act with integrity and comply with the applicable laws, regulations, codes, policies and procedures.

Our Ethics is a guide to help us do that.

Our Ethics sets out the standards of conduct and behaviour that we would like every member of our workforce, including our extended network of partners, to embrace.

Please take the time to read through and understand *Our Ethics*. Following this guide, we can work together to protect and nurture the respect and the trust, that is so intrinsic to our brand and our culture, for many more years to come.

Thank you,

Christine.

Christine Holgate
Group Chief Executive Officer and Managing Director

Our workforce participants include anyone who performs services for the Australia Post Group, or on our behalf, in every corner of the world. Workforce participants include:

- *employees of any company in the Australia Post Group*
- *contractors, consultants, licensees and agents (and their employees and subcontractors), who perform services for the Australia Post Group*
- *any other third parties performing services for or on behalf of the Australia Post Group.*

*The **Australia Post Group** means the Australian Postal Corporation, its subsidiaries and all of its associated entities.*

Our ethical standards policy

Australia Post Group's policy is to:

- inform all of our workforce participants of our ethical standards
- recognise and promote the ethical and lawful we expect of our workforce participants – while actively demonstrating it ourselves

- expect that Australia Post Group people leaders, as well as our licensees and principal contractors, will take steps to address any unethical behaviour as soon as they become aware of it
- take action under our contracts with contractors, licensees, and suppliers to enforce ethical standards and deal with breaches
- refer suspected or alleged criminal behaviour to Australia Post Group Security.

The Australia Post Group's ethical standards

Our ethical standards describe the behaviour that we expect of all of our workforce participants.

In addition to these ethical standards, the Australia Post Group has a number of policies and procedures in place which also apply.

Who you should speak with first

Your people leader, principal contractor or licensee can tell you more about the policies and procedures that apply to your work. They'll also be able to answer any questions you might have about our ethical standards.

Use this booklet as an action plan

Our Ethics helps us put the Australia Post Group's expected standards of behaviour into practice. Everything from our performance and work environment, to our reputation and business success depends on us meeting these standards – so it's important that any behaviour that's not up to standard is quickly resolved.

Of course, we can't cover every possible circumstance in one booklet – so if you find yourself in a situation that isn't specifically referenced, take a look at "What to do when in doubt" on page 18 of this policy.

1. Health, safety and the work environment

Safety first – for all people, always

Our safety strategy supports our goal of zero harm for everyone by placing their care and wellbeing at the centre of everything we do. Safety is everyone's responsibility. We have work health and safety management systems, policies, procedures and training in place to support our safety strategy – while promoting safe working practices in a safe working environment. The Australia Post Group does not tolerate unsafe behaviour.

1.1 It's your responsibility to:

- perform all of your work safely
- comply with safe operating procedures and workplace safety rules
- use protective equipment where provided, and as trained
- make sure your own work and safety – and that of others' – is never affected by alcohol or drugs (medically prescribed or otherwise), especially when operating machinery, vehicles or equipment
- use our incident reporting system to report risks, incidents, hazards and unusual actions or situations, whether related to Australia Post Group workplace participants or not.

1.2 It's not acceptable to:

- take part in any activity or work that might be dangerous to yourself or others
- ignore or fail to respond to a work health and safety issue that has come to your attention (whether you've identified it yourself, or it's been brought to your attention by someone else)
- smoke in Australia Post Group outlets, offices, buildings, vehicles or any other designated smoke-free area

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- d. consume alcohol (or make it available for consumption) while on duty or at any Australia Post Group work site – both within and outside of normal working hours (except at authorised functions)
- e. consume or possess illegal drugs on Australia Post Group premises, in our vehicles, at corporate functions or when conducting Australia Post Group business
- f. use mobile phones and other devices while operating motor vehicles or company machinery / equipment.

2. Complying with laws and regulations

“We’re a business that’s built on doing what’s right – no matter what. That takes honesty, transparency and sometimes a little courage, too.”

2.1 It’s your responsibility to:

- a. comply with the applicable laws, regulations and codes relevant to your work
- b. follow the legal requirements of any host country when working or conducting business for the Australia Post Group overseas. If there’s any inconsistency between Australian legal requirements, and those of the host country, you’ll need to comply with the stricter requirements
- c. speak up if you become aware of or suspect misconduct, unlawful conduct or other unacceptable behaviour when working or conducting business for the Australia Post Group in any region.

2.2 It’s not acceptable to:

- a. steal or tamper with mail, or obstruct mail delivery
- b. pay or accept (or attempt to pay or accept) bribes
- c. steal property or cash
- d. act against any standards set by any Australian law or regulation.

3. Work practices and performance

“Delivering outstanding customer experiences takes more than talk. It takes action. We set high standards of professional behaviour to create a positive work environment – that leads to the best possible customer service.”

3.1 General requirements:

3.1.1 It’s your responsibility to:

- a. comply with all our policies and procedures – along with all of the laws, industrial awards and agreements that apply to your work
- b. participate in all required workplace training
- c. make sure that anything you tell us about yourself or other workforce participants is true and correct
- d. consistently perform work to the expected standard or higher
- e. exercise care and diligence in your work
- f. meet any requirements where you have to consent to a criminal history check, or provide a declaration or statement specified by the Australia Post Group – where it’s considered relevant to the requirements of your work

- g. immediately inform your people leader, principal contractor or licensee if a licence or qualification that's required for your work has been cancelled or suspended
- h. promptly inform your people leader, principal contractor or licensee if you've been charged with, or found guilty of, a criminal offence – sharing the full details of the incident as well
- i. speak up if you see inappropriate or unsafe behaviour by speaking to your people leader, principal contractor or licensee, or by contacting the Group Whistleblower Hotline on 1800 799 353.

3.1.2 If you're an employee of the Australia Post Group, you must also:

- a. attend work reliably – and work the hours outlined for your role
- b. use the correct procedures to let us know if you can't attend work, or if you'll be absent for any period of time during work
- c. follow all reasonable and lawful directions from authorised persons
- d. present yourself professionally and dress appropriately for your work environment, including wearing a uniform or corporate clothing if it's required.

3.1.3 It's not acceptable to:

- a. intentionally or recklessly engage in conduct that damages Australia Post Group's interests or public reputation
- b. act in a way that could cause, damage or harm to any workforce participant, or adversely affect relations in our workplace
- c. intimidate, offend or mislead other workforce participants, customers, suppliers or the public
- d. damage our property – or the property of other workforce participants, customers, suppliers or the public
- e. gamble or bet at work (except for authorised sweeps and tipping competitions)
- f. claim unjustified hours of work, or fail to accurately and promptly record your leave
- g. be charged with, or found guilty of, a criminal offence that has the potential to bring the Australia Post Group into disrepute.

A 'criminal offence' means any breach of criminal law that is dealt with by a court, and that can result – after conviction or finding of guilt – in a monetary penalty, bond, imprisonment or any other court-imposed penalty.

3.2 People leaders' responsibilities

3.2.1 People leaders have a special responsibility to:

- a. lead by example so that their own actions meet our ethical standards
- b. foster a safe, healthy and positive workplace culture that's consistent with our ethical standards
- c. take the right steps to respond to any unacceptable behaviour that's brought to their attention.

3.3 Customer service

"Few organisations in Australia are built around our customers like we are – and we're driven to deliver outstanding experiences every step of the way."

3.3.1 It's your responsibility to:

- a. show our customers how valued they are, by safely providing service of a consistently high standard
- b. handle our customers' products appropriately and securely
- c. always strive to improve our service – and embrace new technologies that are introduced to help you do that
- d. find ways to overcome any obstacles that impact your ability to deliver outstanding service – and get a more senior member of your team involved if need be
- e. stay up to date with the products, services and processes relevant to your duties
- f. keep customer, supplier, employee and business information private.

3.3.2 It's not acceptable to:

- a. throw, dump or mishandle product
- b. sign for items 'on behalf of' customers, or ignore the correct carding procedures
- c. intentionally mislead customers with inaccurate or out-of-date information
- d. fail to take responsibility for a customer's problem, or solve it fully
- e. be rude, impatient or act in a way that suggests you don't care about our customers' concerns
- f. ignore a customer service issue, or fail to escalate when appropriate.

3.4 Respecting everyone

"We make sure everyone feels as valued, respected and included as they should."

Australia Post Group workplaces come in all shapes and forms. But they all share a commitment to treating everyone fairly and with respect – valuing the contribution everyone makes.

Our workplaces are inclusive and fair, with equal employment opportunities, where people are hired or promoted based on their hard work, not who they are.

3.4.1 It's your responsibility to:

- a. always treat every employee, customer, contractor and supplier with courtesy and respect
- b. contribute to a workplace that welcomes, values and encourages different constructive opinions, perspectives and backgrounds
- c. be open to change and the good things it can bring – supporting fresh thinking, programs and practices that benefit our business and our stakeholders.

3.4.2 It's not acceptable to:

- a. cause disadvantage, discomfort, embarrassment or offence to other workforce participants at work, during out-of-hours activities or when using social media
- b. discriminate, harass or bully anyone at work, during out-of-hours activities or when using social media
- c. start or spread rumours that could damage another person's reputation, including on social media

- d. threaten, abuse or intimidate (physically, verbally or in writing), or injure or attempt to injure another person – whether at work, during out-of-hours activities or when using social media
- e. engage in unauthorised transactions with other workforce participants, where interest, money or similar is charged or paid
- f. access, store or distribute inappropriate material (such as pornographic or offensive material, or content in breach of the Harassment, Discrimination and Bullying Policy, the Technology Use Policy, or any equivalent subsidiary policy) electronically or in hard copy (including via email, mobile phone or online)
- g. digitally record a private conversation unless everyone involved has agreed to it.

“We’re all responsible for doing our work in accordance with the Australia Post Group’s culture, ethical standards and supporting policies and procedures. Because when we do, everybody benefits.”

“Out-of-hours activities include social activities with other workforce participants, work-related activities that take place outside standard work hours, or contributing to social media forums where your connection to the Australia Post Group could be reasonably ascertained.”

3.5 Fair competition

“We work together to do things better – sharing information and opinions, and always being open and inspired by new ideas.”

The Competition and Consumer Act 2010 (Cth) sets out the principles of fair competition. The Australia Post Group engages in fair competition – and we educate workforce participants about the Act through our Group Competition and Consumer Law Policy.

3.5.1 It’s your responsibility to:

- a. act fairly and honestly when dealing with our customers, suppliers and competitors
- b. ensure that your behaviour, business decisions and marketing initiatives comply with the principles and laws of fair competition.

3.5.2 It’s not acceptable to:

- a. discuss prices, discounts, allowances, rebates or credits with competitors
- b. discuss “excluding” or “limiting” dealings with a particular supplier or customer
- c. make it a condition of supply that a customer must acquire products or services from another person
- d. engage in conduct with the intention of substantially lessening competition in a market where a member of the Australia Post Group acquires or supplies goods or services.

4. Conflicts of interest

“When we make decisions in the Australia Post Group, we do it for the good of the organisation and our customers. That means no prejudice, no favouritism, and no being in it for ourselves.”

4.1 General requirements

4.1.1 It’s your responsibility to:

- a. avoid situations or actions that create (or may be seen to create) a conflict of interest, or situations that might interfere with the exercise of sound judgement

- b. avoid becoming involved in decisions and decision-making processes that could lead to personal gain for you, an immediate family member or a close personal friend
- c. let your people leader, principal contractor or licensee know if there's a conflict of interest – or if that might be perceived. Examples of these include:
 - i. a sale to, or purchase from, a business in which you, an immediate family member or close personal friend hold a direct or significant indirect interest
 - ii. where you're associated with a third party who has an interest in a decision or decision-making process that involves you
 - iii. your involvement in recruiting or selecting an immediate family member, partner or close personal friend
 - iv. entering into an intimate / romantic relationship with another workforce participant, customer or supplier.

4.1.2 Don't hide, or ask others to hide, personal relationships which may cause a conflict of interest.

"A conflict of interest exists where your loyalties are divided between the Australia Post Group and your own personal interests"

4.2 External gifts, entertainment, benefits and hospitality

The Australia Post Group is committed to doing business honestly, and with integrity.

4.2.1 It's your responsibility to:

- a. be careful and exercise good judgment when giving or accepting gifts, entertainment, benefits and hospitality from existing or potential suppliers, external customers or competitors
- b. never offer, give, seek, accept or appear to expect a gift, entertainment, benefit or hospitality that could be reasonably regarded as:
 - i. influencing your ability to make objective decisions
 - ii. influencing the recipient, or creating a business obligation with them
 - iii. creating a conflict of interest
 - iv. damaging to relationships, or suggesting favouritism or prejudice towards a particular person or group of people
- c. before giving or accepting a gift or benefit, make sure it:
 - v. is acceptable under the Group Gifts, Benefits and Hospitality Policy
 - vi. is token, seasonal or for a special occasion and of moderate value
 - vii. couldn't reasonably be seen to be a bribe or inappropriate in any way
- d. talk to your people leader, principal contractor or licensee if you're not sure a gift or benefit is acceptable
- e. follow the Group Gifts, Benefits and Hospitality Policy to register any gifts, entertainment, benefits and hospitality

"What makes something a gift or benefit? Anything of value – including a direct payment, like money, and payments in kind, such as discounts, loans, goods and services, favourable terms on any product or service, shares or other securities and vouchers. Hospitality includes meals, travel, accommodation and entertainment."

"If you're also working outside of the Australia Post Group, remember that any other jobs or associated activities can't conflict with your role at the Australia Post Group, or potentially damage our reputation."

4.2.2 It's not acceptable to:

- a. seek or give unauthorised gifts, entertainment, benefits or hospitality
- b. accept gifts of money or equivalent benefits, such as gift vouchers
- c. accept repeated gifts or hospitality from the same giver, no matter how small or insignificant – this could be seen as an attempt to make an obligation towards that person
- d. improperly use your position to gain an advantage or cause (or potentially cause) harm to the Australia Post Group.

If you're not sure of any of the above, refer to page 23 – "What to do when in doubt".

4.3 Suppliers

The fair and open relationships we have with our suppliers is a vital part of how the Australia Post Group does business, so it's important that we resolve any issues as soon as we can.

4.3.1 It's your responsibility to:

- a. follow our procurement and tendering policies and procedures
- b. avoid any relationship – financial or otherwise – with potential or existing suppliers, as this could influence your judgement, or be seen that way
- c. act lawfully and fairly with all suppliers
- d. inform Australia Post Group management of any potential, perceived or actual conflicts of interest before beginning any procurement activity, or as soon as you become aware of any such potential, perceived or actual conflict.

4.4 Probity and sales to Government

If your work involves sales to government, you must ensure that we compete fairly for all government work, and follow the correct tender processes as required.

4.5 Outside employment and associated activities

4.5.1 It's your responsibility to:

- a. only engage in outside employment or associated activities if such activity would not:
 - i. make it difficult for you to attend your work at the Australia Post Group, or interfere with your ability to perform that work safely
 - ii. have a negative effect on your performance with the Australia Post Group (including where you might be injured, or aggravate an existing injury or condition – affecting your performance or leading to sick leave or medical retirement)
 - iii. create a conflict of interest with your nominal duties, or the commercial objectives of the Australia Post Group

- iv. lead to disclosure of unauthorised Australia Post Group information
 - v. create the misleading perception that you represent the Australia Post Group.
- b. only act as a director of a company or incorporated society, trust, fund, or community or industry association in the following circumstances:
- i. where there's no conflict, or appearance of conflict, between your work at the Australia Post Group and your duties as director
 - ii. at the request or consent of the Australia Post Group, according to any conditions set down by us
 - iii. in line with the requirements of your official Australia Post Group duties
- c. in all cases, make sure you let your people leader, principal contractor or licensee know of any outside employment or associated activities – so they can give you the all clear to take part in it, and you can be certain it's not impacting your work with the Australia Post Group.

4.5.2 It's not acceptable to:

use Australia Post Group property, information, money, facilities, or time – or the services of Australia Post Group workforce participants – for your outside employment and / or associated activities.

4.6 Bribery and corruption

Australia has strong laws against corrupt behaviour like bribery, embezzlement, money laundering and extortion – and many foreign jurisdictions are equally tough. Any person or company who bribes a foreign public official when in Australia can be prosecuted. In a similar way, any Australian citizen, resident or company incorporated in Australia who commits bribery, within or outside Australia, can be prosecuted.

Aside from breaches of *Our Ethics*, penalties for corruption can include jail terms and substantial fines – as well as significant damage to the Australia Post Group's reputation.

4.6.1 It's not acceptable to:

- a. bribe, or attempt to bribe, an individual – including a foreign public official or company representative within or outside Australia
- b. engage in any conduct that might contribute to embezzlement, corruption, money laundering or extortion.

“Associated activities could include providing services, practising a profession, occupation or trade, or acting as a director of a trust, fund, community or industry association, company or incorporated society.”

5. Corporate responsibility

“Few brands have a place in the hearts and minds of Australians quite like ours. By practising good corporate citizenship – and encouraging our people to do the same – we can continue to play a respected and respectful role in the community.”

5.1 Responsible corporate citizenship

As an iconic Australian brand and a values-driven business, the Australia Post Group is committed to responsible corporate citizenship.

- a. This commitment means:
 - i. we support sustainable development and work to meet the UN Sustainable Development Goals

- ii. we're committed to operating in accordance with the 10 Principles of the UN Global Compact – which relate to human rights, labour, environment and anti-corruption
 - iii. we're equally committed to protecting the people working in our supply chain against the exploitative practices of modern slavery.
- b. Australia Post Group policies and procedures, including Our Ethics, are written to support our efforts to deliver on these commitments. The words in these documents are just the start, though – and we all have a responsibility to honour what we stand for.

“Visit www.auspost.com.au/corporateresponsibility for more information”

5.2 Environmental sustainability

5.2.1 It's your responsibility to:

- a. follow environmental laws and regulations, along with the Australia Post Group's Environment Policy
- b. consider any potential environmental impacts when making investment decisions, developing plans and strategies, and purchasing goods and services
- c. responsibly manage waste, including re-using and recycling where possible
- d. responsibly use resources like water, electricity and fuel
- e. talk to your manager if you find out about any environmental incidents or risks

“We're taking great steps to reduce any potential environmental risks to our people, infrastructure and services.”

6. Using corporate property

“We have all sorts of tools and resources available to our workforce participants in the Australia Post Group. We can all do our part to make sure they're used safely and effectively”

6.1 Assets and resources

6.1.1 It's your responsibility to:

- a. correctly and efficiently use Australia Post Group property, while keeping that property secure
- b. only use our assets and resources for Australia Post Group business, unless your people leader, principal contractor or licensee has given the all-clear for personal use. If they have, make sure you:
 - i. follow any imposed limits
 - ii. keep the asset(s) secure
 - iii. properly care for the asset(s)
 - iv. use the asset(s) efficiently, in your own time, while providing all consumables (unless otherwise authorised)
- c. follow the laws, regulations and current policies that relate to using our property, assets and resources
- d. return all Australia Post Group property if you're no longer working with us.

6.1.2 It's not acceptable to:

- a. use our property for personal gain, for the benefit of people outside the Australia Post Group, or to deliberately help others do the same
- b. use corporate information resources, such as the internet or email, outside policy restrictions
- c. publish images of our property online or social media, without approval from the Legal team or your people leader, principal contractor or licensee
- d. fail to maintain and operate company property and equipment, including all types of vehicles, safely and responsibly in accordance with our procedures and policies
- e. use a corporate credit card for personal purchases.

“Intellectual property is a broad term used to describe the rights that exist in all creative and original works – like logos, marketing materials, internal manuals, reports, emails, photographs, packaging, designs, inventions and corporate information.”

6.2 Intellectual property

We protect our intellectual property – and respect the IP of others too. It's essential to how we work and how the marketplace sees us.

6.2.1 Any intellectual property you create during your work with the Australia Post Group remains our property unless we've informed you otherwise.

6.2.2 It's your responsibility to:

- a. follow the Australia Post Group's Intellectual Property Management Policy
- b. protect our intellectual property by identifying it wherever possible – and acting to secure our rights to it
- c. get written consent before using someone else's intellectual property, for example:
 - i. using a photograph taken by someone external to the Australia Post Group when creating a catalogue or designing a stamp
 - ii. downloading information from the Internet or copying part of a book or report, then distributing it to others at work
 - iii. preparing any advertising material that uses text written by someone external to the Australia Post Group
- d. talk to your people leader, principal contractor or licensee, or contact the Legal team for advice, if you have any doubts about any work you're doing that involves intellectual property.

7. Corporate records

The records we keep at the Australia Post Group cover everything from our finances, to business and employee details – and we meet all the commercial, legal, management and archival obligations to make sure our records are accurate, complete and secure.

7.1 It's your responsibility to:

- a. make sure that every record, declaration or statement you prepare as part of your work for the Australia Post Group is factual, accurate, complete, honest, objective and timely

- b. only authorise records that are accurate and complete
- c. only disclose records once you've been authorised to do so, or in response to the proper legal processes
- d. be sure that all information – particularly specially sensitive or personal information like customer payment card details – is properly secured, so it can't be used or disclosed inappropriately
- e. only access commercially-sensitive
- f. or personal information, including customer payment card details, if you're authorised to do so – and if the business needs that information
- g. return Australia Post Group records to us before finishing up your employment or engagement
- h. immediately inform your people leader, principal contractor or licensee if you become aware of an actual or potential data breach. A data breach is any unauthorised access, disclosure or loss of personal information.

7.2 It's not acceptable to:

- a. make a false, misleading or unsupported record
- b. intentionally suppress relevant information in a record
- c. become aware of an actual or potential data breach and not let your people leader, principal contractor, or licensee know.

"Keeping complete and accurate records is an essential part of what we do"

8. Privacy, confidentiality and public comment

"Protecting personal and confidential information is a must – and all of our people need to understand their role in keeping those details safe."

"Confidential information includes (but isn't limited to) information relating to our customers, business practices or commercially-sensitive data.

Personal information is any information or an opinion (whether true or not, about an individual whose identity is apparent, or can be reasonably ascertained from, the information or opinion."

8.1 Business, customer, supplier and personnel information

8.1.1 It's your responsibility to:

- a. follow our Privacy, Customer Data and Use and Information Security Policies (or any equivalent subsidiary policy) when handling personal information
- b. arrange for business partners to sign a confidentiality agreement before sharing any confidential information (the Legal team can help you with this)
- c. only use personal, business, customer, supplier and personnel information for authorised reasons – and protect it from theft, unauthorised disclosure access or misuse

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- d. treat any information about the Australia Post Group, our customers and our suppliers as confidential – especially if it might provide a competitive or financial advantage, or might relate to a customer’s business. The only exception is if the information is publicly available through channels like our website, press releases or annual report
- e. only disclose personal or confidential information to another person or entity (other than the individual concerned) if the disclosure complies with our policies
- f. protect personal or confidential information during your employment or engagement with the Australia Post Group – as well as once you’ve finished working with us
- g. report any breaches (or potential breaches) of privacy to the Chief Risk Officer straight away by emailing privacy@auspost.com.au
- h. if you’re not sure about your rights and responsibilities under privacy laws – or any obligations you might have relating to confidential information talk to your people leader, principal contractor, licensee, or the Chief Risk Officer for advice.

“ We’ve built a reputation as an organisation Australians can trust – and protecting their personal and confidential information is critical to that reputation.”

8.2 Public comments

8.2.1 It’s your responsibility to:

- a. tell your manager about any media requests or proposals to release corporate information. Any public comment needs to be authorised by our Corporate Affairs team – and that includes speaking engagements, interviews, and views expressed in any form of public communication)
- b. use social media responsibly and in accordance with our Social Media Policy (along with any equivalent subsidiary policy) so that you don’t:
 - i. release confidential Australia Post Group information
 - ii. breach copyright or privacy obligations
 - iii. make comments, post pictures or do anything that could harm our people, brand, reputation or commercial interests, or defame anyone.

9. What to do when in doubt

From time to time, you may need a hand working out the right thing to do in a particular situation. This guide can help you.

Before you act

Ask yourself the following questions:

- Would it be in line with our culture and ethical standards?
- Would it meet our wellbeing and safety standards?

If you answered “no” to either question, you shouldn’t go ahead. You can also discuss anything you’re not entirely sure on with your people leader, principal contractor, licensee or a member of our human resources team.

If you've taken the wrong action

If you think – or you know – you've acted in a way that doesn't meet our ethical standards, the best thing you can do is tell your people leader, principal contractor or licensee straight away.

When you need help

We all go through personal problems from time to time. And these problems can impact your performance at work, your wellbeing and your safety – while also making it harder to meet our ethical standards.

Sometimes it's not as easy as hoping those problems will go away, either. Which is why we offer confidential assistance and support for all of our employees and their immediate family members through our Employee Assistance Program (**EAP**). Our contractors and licensees have access to our Workforce Assistance Program (**WAP**).

You can find out more about the EAP and WAP at all Australia Post Group workplaces – or by calling 1300 687 327 (**1300 OUR EAP**).

10. Are you concerned about somebody else's behaviour?

You might come across behaviour in your workplace that you think is unethical or inappropriate. This section will help you work out what to do next.

Improper behaviour

Examples of improper behaviour include:

- discrimination – for example, based on gender, race, religion, or pregnancy
- harassment – like sexual harassment and stalking
- bullying – which is any repeated unreasonable behaviour that creates a risk to health and safety
- discourtesy, disrespect, or rudeness.

If you see any of these behaviours, take steps to address it by:

- raising it directly with the employee(s) concerned, if it's appropriate;
- discussing it with your people leader, principal contractor or licensee; or
- asking a member of our human resources team for advice.

It's not always easy to report suspected serious misconduct or suspected criminal behaviour. The Australia Post Group strives to protect anyone who does.

Serious misconduct

Examples of alleged serious misconduct include:

- actions involving substantial risk to the health and safety of others
- a serious mismanagement of the Australia Post Group's assets and resources
- behaviour that could seriously damage our business or reputation.

If you encounter or suspect serious misconduct, you need to report it to your manager or supervisor as soon as possible. If you feel this isn't appropriate, you can contact the Group Security, Human Resources or the Whistleblower Hotline.

Our whistleblower process

We have a process in place if you would like to report unethical, unlawful or undesirable conduct anonymously. You can call the whistleblower hotline on 1800 799 353, or email whistleblower@auspost.com.au.

If your report is made on reasonable grounds, it'll be documented and promptly investigated, either internally or by external agencies. We'll share with you know the outcomes of the investigation, as appropriate. It's important that you keep the details of your report to yourself, though – as it could impact the investigation or anyone involved.

Suspected criminal behaviour

Examples of suspected criminal behaviour include:

- stealing, tampering or withholding mail
- conducting fraudulent activity for financial gain
- stealing property and/or cash.

The Australia Post Group Security team investigates all suspected or alleged criminal behaviour in the Australia Post Group. If there's enough evidence to support the allegation, it'll be referred to the appropriate authorities – which may include the Police or the Commonwealth Director of Public Prosecutions.

If you report alleged serious misconduct or suspected criminal behaviour

The Australia Post Group will:

- keep your identity and your report as confidential as the law requires or permits
- not tolerate any reprisals against you for disclosing information on reasonable grounds
- act in your best interests to protect you from any negative reactions, victimisation or intimidation.

If you knowingly make a false report, you could face disciplinary action yourself.

Improper or criminal behaviour and serious misconduct does more than harm our reputation – it can harm our people. Which is why it's so important that you report any suspicious behaviour.

Roles & Responsibilities

Policy Governance

Requirement	Responsible area/Role	Activities
Accountable Executive	Executive General Manager, People & Culture	To oversee the application of the Policy

Policy Operation

Requirement	Responsible area/Role	Activities
Identify and manage any behaviour that is inconsistent with the principles of Our Ethics	People leaders, principal contractors and licensees	Foster an environment that encourages compliance with the principles of Our Ethics.
Comply with regulatory obligations, policies and procedures. Undertake relevant training.	Workforce participants	Comply with regulatory and legal obligations, and the requirements of Our Ethics

Policy Monitoring & Oversight

Requirement	Responsible area/Role	Activities
Periodic review	Employee Relations	Undertake periodic review of this Policy
Periodic internal audit for compliance with Our Ethics	Internal Audit	Option to undertake internal audit to determine level of compliance with Our Ethics, and ensure breaches and incidents are realised and reported appropriately

Glossary

Term	Definition
Australia Post Group	Australian Postal Corporation, its subsidiaries, and all of its associated entities.

Classification: Internal

Policy Administration

Key Policy Information

Administrative Area	Policy Information
Document Title	Our Ethics
Policy Level	1
Version No	2.0

Policy Owners and Governance Forums

Administrative Area	Owner / Forum
Accountable Executive	Executive General Manager, People & Culture
Policy Owner	General Manager, Employee Relations
Policy Administrator	Chief Risk Officer
Policy Content Owner	General Manager, Employee Relations
Review and Approval Body	Australia Post Board

Key Dates

Administrative Area	Date
Policy Approval Date	12 December 2018
Policy Effective Date	4 February 2019
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