



Our Ethics:

How we do things at the
Australia Post Group





Australia Post acknowledges the Traditional Custodians of the land on which we operate, live and gather as employees, and recognise their continuing connection to land, water and community.

We pay respect to Elders past, present and emerging.



Meet the standards we should all be striving towards



Hi Team

In a rapidly changing world, it is essential that our standards and guidelines evolve to meet new challenges and opportunities. The latest **Our Ethics** reflects our collective efforts to stay ahead, ensuring that we not only adhere to the highest ethical standards,

but also inspire trust and confidence among our customers, partners, and communities.

Our Ethics is underpinned by our shared values of trust, inclusivity, empowerment and safety, and an unwavering commitment to integrity. **Our Ethics** is more than a set of guidelines; it reflects who we are and what we stand for. It encapsulates our commitment to doing the right thing, even when it is not the easiest path. It means putting safety first, for everyone, always.

We are the custodians of one of Australia's oldest and most trusted brands. Each of you plays a crucial role in upholding these standards and ensuring that Australia Post remains a trusted and respected part of the Australian community for another 200 years.

This **Our Ethics** booklet is a valuable resource to help us make this a reality. It sets out the standards of conduct and behaviour that are important for every team member, including our extended network of partners, to fully embrace.

Part of living **Our Ethics** is also feeling empowered to report any ethical issues and behaviours that don't align with these guidelines. Information on how to report issues are included in the **Our Ethics** booklet.

Please take the time to read through and understand **Our Ethics**. If we all commit to embracing the principles, we can navigate the complexities of our dynamic environment, uphold our ethical commitments, and deliver a better tomorrow.

Be safe, be kind,

Paul Graham,
Group Chief Executive Officer
and Managing Director
Australia Post

Who are our Workforce Participants?

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.



Contents

Purpose and values	4
--------------------	---

5

Corporate responsibility 21

Our Ethics 6

6

Using corporate property 22

Health, safety and the work environment 8

7

Corporate records 24

Complying with laws and regulations 10

8

Privacy, confidentiality and public comment

25

Work practices and performance	11
--------------------------------	----

9

What to do when in doubt

26

Conflicts of interest and ethical behaviour 16

10

Are you concerned about somebody else's behaviour?

27

Index 29



Purpose and values

Our purpose

We connect people with each other and the world. We help unlock opportunities for everyone.

Our purpose is why we exist, it's what we believe in and what we want to make possible for everyone.

What we do may change over time to meet the needs of our customers and the community. But our purpose – **why** we do it – will never change. After all, it's the reason we started more than 200 years ago.



Purpose and values

Our values

Our four core values are **Trust, Inclusivity, Empowerment** and **Safety**. These are the **TIES** that bind us.

Our values underpin everything we do, and guide how we behave and communicate with each other and our customers.

Together with our values, Our Ethics set out the standards of conduct and behaviour that we all need to embrace to help make our organisation one that every Australian can be proud of.



Trust

Do the right thing. Communities rely on us. We have the courage to speak up, be honest and take responsibility for our actions.



Inclusivity

Respect everyone. Everyone deserves to belong. We ensure people feel respected and included.



Empowerment

Find a way. The world is full of possibility. We challenge ourselves to create a better future for everyone and get the job done.



Safety

Be safe and well. Everyone should feel safe and well in the course of their day. We support and care for each other.

Our Ethics

Rationale and Scope

Everything we do has social, environmental and economic impacts.

Our own success and sustainability as an organisation depends on both what we do and how we do it.

For this reason, it is important to always work and act with integrity and to 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 require every Workforce Participant to embrace.

Application

Our Ethics applies to the Australia Post Group, which is defined as the Australian Postal Corporation and its subsidiaries. This includes all Australia Post Group Workforce Participants, meaning:

- any team member of any company in the Australia Post Group
- the extended workforce of 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.

Our Ethics Principles

Australia Post Group's Our Ethics policy principles:

- 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
- promote efficient, effective and economical workplace practices
- comply with the unique obligations that apply to us as a Government Business Enterprise and the supplier of postal services to the Australian community
- 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 or licensees to enforce ethical standards and deal with breaches
- refer suspected or alleged criminal behaviour to Australia Post Group Security.

Our ethical standards policy

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.

Our Ethics

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 Our Ethics booklet as a guide

- 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 policy or booklet – so if you find yourself in a situation that isn't specifically referenced, take a look at the "What to do when in doubt" section of Our Ethics.

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



1 Health, safety and the work environment

Safety first – for all people, always.

1.1 People leaders' responsibilities

1.1.1 People leaders have a responsibility to:

- a. promote active leadership in safety and wellbeing
- b. provide team members with the highest level of protection against harm to their health, safety and wellbeing from hazards and risks arising from activities in their workplace, so far as reasonably practicable
- c. communicate Australia Post Group's responsibilities for identifying hazards, assessing risks and taking appropriate action to maintain a safe and healthy work environment for their team members
- d. report incidents and participate in investigations as the need arises
- e. provide awareness to their team members regarding attendance at work in a fit and healthy manner ready to complete their required tasks
- f. develop the capability of their team members by enhancing their knowledge in safety and wellbeing programs
- g. help Australia Post Group to continuously improve its safety management system through regular consultation and review with senior leadership.

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.

1.2 It's your responsibility to:

- a. perform all of your work safely
- b. comply with safe operating procedures and workplace safety rules
- c. use protective equipment where provided, and as trained
- d. 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
- e. use our incident reporting system to report risks, incidents, hazards and unusual actions or situations, whether related to Australia Post Group Workforce Participants or not.

1 Health, safety and the work environment

A safe working environment is built on respect.

1.3 It's not acceptable to:

- a. take part in any activity or work that might be dangerous to yourself or others
- b. 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)
- c. smoke in Australia Post Group outlets, offices, buildings, vehicles or any other designated smoke-free area
- 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. attend work under the influence of alcohol or other drugs, or with a concentration of alcohol or other drugs above the limits prescribed by Australia Post Group
- g. 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
- d. acknowledge and understand that, as a Government Business Enterprise and the provider of postal and delivery services to the Australian community, we each have a special obligation to:
 - i. act lawfully, ethically, efficiently and responsibly in everything that we do
 - ii. perform our duties with due care and diligence
 - iii. act honestly, in good faith and for a proper purpose
 - iv. not improperly use our position or improperly use information obtained from our position
 - v. disclose material personal interests.

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 and complete 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. participate as part of a team and support others around you to achieve common team goals
- f. exercise due care and diligence in your work
- g. cooperate with others to achieve common objectives where possible
- h. meet or hold and continue to meet or hold all requirements, clearances, qualifications and licenses necessary for you to perform your work or required by the Australia Post Group, including holding working rights for the country you are based in and cooperating with any steps to validate these, including by consenting to relevant checks, or providing declarations or statements
- i. immediately inform your people leader, principal contractor or licensee if a licence, qualification or clearance that's required for your work has been cancelled or suspended
- j. promptly inform your people leader, principal contractor or licensee if you've been charged with, or found guilty of, a criminal offence including under police investigation, sharing the full details of the incident as well
- k. speak up if you see inappropriate or unsafe behaviour by speaking to your people leader, principal contractor or licensee, or by contacting the Australia Post Group Our Ethics and Whistleblower Reporting Service on 1800 799 353 or by logging a report online
- l. properly advise your manager within a reasonable timeframe where a breach of the law or an act of serious misconduct is proven. If you are aware of such a breach or act, but do not report these matters to your manager, then you may also be in breach of Our Ethics.

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

- a. attend work reliably and on time – 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 Work practices and performance

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

3.1.3 It's not acceptable to:

- a. intentionally or recklessly engage in conduct that damages Australia Post Group's interests, brand or 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, remove or tamper with 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, or that has the potential to damage Australia Post Group's brand or reputation.

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 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
- d. manage performance and/or behavioural matters in a timely, appropriate and efficient manner
- e. make fair, consistent, efficient, economical and effective decisions that help to achieve our purposes and reflect our values
- f. foster a culture that drives innovation, improves productivity and recognises and rewards excellent outcomes
- g. apply empathetic people management skills to bring out the best in team members and prioritise their holistic wellbeing
- h. make sure their advice and decisions are based on sound information and formed in a principled and honest manner
- i. ensure that their teams are clear about what is required of them and that they have the information and training needed to perform their duties.

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 Work practices and performance

Getting things done – and done well – takes hard work, determination and imagination. We have all of that, and then some.

3.3 Customer service

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 do that
- d. find ways to overcome any obstacles that impact your ability to deliver outstanding service, and escalate to your people leader as required
- 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 not follow the correct delivery and carding procedures
- c. intentionally mislead customers with inaccurate or outdated information
- d. fail to take responsibility for a customer's problem or solve it to a high standard
- 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

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.

Harassment (including sexual and sex-based harassment and stalking), discrimination, bullying, victimisation and the creation of hostile work environments (i.e. a work environment that is offensive, intimidating or humiliating to a person on the ground of that person's sex or an associated characteristic) is prohibited and is not tolerated in our workplaces. In particular, allegations of physical, verbal or non-verbal sexual harassment are taken extremely seriously.

3.4.1 It's your responsibility to:

- a. always treat every team member, customer, contractor and supplier with courtesy and respect
- b. contribute to a safe and healthy 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 stakeholders
- d. contribute to a 'speak up' workplace culture by reporting inappropriate behaviour when you see or experience it, and take appropriate action
- e. read and understand the terms of our Harassment, Discrimination and Bullying Policy and Guidelines, and familiarise yourself with the consequences of non-compliance.

3 Work practices and performance

3.4.2 It's not acceptable for Workforce Participants, either at work, during work-related or out-of-hours activities, when representing (or in association with) Australia Post Group (including online), or in interactions with other Workforce Participants, to:

- a. cause disadvantage, discomfort, embarrassment or offence to other Workforce Participants
- b. discriminate, bully, harass (including sexually harass, victimise or stalk) anyone
- 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
- 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 work-related or private conversation unless everyone involved is aware and 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. 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 Work practices and performance



3.5 Fair trading and competition

The Competition and Consumer Act 2010 (Cth) sets out the principles of fair competition. The Australia Post Group engages in fair trading and competition and we educate Workforce Participants about the Act through our Group Competition and Consumer Protection Policy.

3.5.1 It's your responsibility to:

- a. act fairly and honestly when dealing with our customers, suppliers and competitors and when promoting our products and services
- 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. bid or interact with competitors in a tender process

- c. make it a condition of supply that a customer must acquire products or services from another person
- d. specify or attempt to specify a price below which our customers must not supply or sell products or services to their customers
- e. 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
- f. engage in conduct that is misleading or deceptive or that is likely to mislead or deceive others
- g. use or attempt to use pressure tactics or engage in conduct which is unreasonable or unduly harsh when dealing with others with significantly less bargaining power
- h. include an unfair contract term in a consumer or small business contract.

4

Conflicts of interest and ethical behaviour

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 avoid:

- a. 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 – including personal interests outside the Australia Post Group
- b. making commercial decisions and/or being involved in decision-making processes that may generate personal gain, or gain for someone who you have a personal relationship with
- c. any paid or unpaid business interest, outside activity, directorship or relationship (financial or otherwise), which might adversely affect sound judgement, the performance of your duties or services, or the brand and reputation of the Australia Post Group
- d. hiding, or asking others to hide, personal relationships which may cause a conflict of interest.

4.1.2 It's your responsibility to:

- a. act fairly and in the best interests of our customers to ensure products and services offered are fit-for-purpose, regardless of our incentives, and take all reasonable steps to ensure any actual, perceived and potential conflicts are adequately addressed

b. let your people leader, principal contractor or licensee know whenever an actual, perceived or potential conflict exists. 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
 - v. involvement with a political party and/or intention to seek to hold a political office which impacts your ability to effectively perform your role or duties (this does not limit your ability to have any political opinion). For further information, please refer to the Group Political Activities Policy.
- c. make written disclosure of conflicts in the Australia Post Group Conflicts of Interest Register, after consultation with your people leader, principal contractor or licensee. Changes to existing conflicts or their management are to be updated in the Register.

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

4 Conflicts of interest and ethical behaviour

4.2 External gifts, 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 open and transparent in your dealings with third parties
- b. be careful and exercise good judgement when giving or accepting gifts, entertainment, benefits and hospitality from existing or potential suppliers, external customers or competitors
- c. 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 (or be seen to be creating) a conflict of interest
 - iv. damaging to relationships or suggesting favouritism or prejudice towards a particular person or group of people.
- d. before giving or accepting a gift or benefit, make sure it:
 - i. is acceptable under the Group Gifts, Benefits and Hospitality Policy
 - ii. promotes the proper use and management of the Australia Post Group's resources and is efficient, effective, economical and ethical
 - iii. is token, seasonal or for a special occasion and of moderate value
 - iv. couldn't reasonably be seen to be a facilitation payment, bribe, pay-off, kickback or inappropriate in any way
 - v. can be documented and explained in sufficient detail that clearly connects it to your role and the benefit to the Group.
- e. talk to your people leader, principal contractor or licensee if you're not sure a gift or benefit is acceptable
- f. obtain pre-approval from your Executive General Manager before offering or accepting gifts, benefits or hospitality with a value of \$100 or more from or to a Government Official
- g. familiarise yourself with and follow the Group Gifts, Benefits and Hospitality Policy and register all reportable gifts, benefits and hospitality in the Group Gifts, Benefits & Hospitality Register. This includes repeated offers from the same third party with a combined value of \$100 or more over 12 months.

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



What makes something a gift or benefit?

Anything of value – including a direct payment, like cash or cash-like equivalents, 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.

4

Conflicts of interest and ethical behaviour

4.2.2 It's not acceptable to:

- a. solicit or actively seek gifts, benefits or hospitality for yourself or others
- b. accept cash or cash-like equivalent gifts, benefits or hospitality. This includes, but is not limited to, cheques, money orders, prepaid gift cards and vouchers, marketable securities, treasury bills and short-term investments
- c. offer or accept gifts, benefits or hospitality which are of an inappropriate value or nature and would put your reputation or the reputation of the Australia Post Group at risk
- d. accept any travel or accommodation paid for by an existing supplier, or any gifts, benefits or hospitality from an organisation that is currently involved in a bid or tender process with the Australia Post Group
- e. improperly use your position to gain an advantage or cause (or potentially cause) harm to the Australia Post Group.

In order to remain fair, impartial and free from the negative impacts of improper influence, it is important these gratuities do not influence, or appear to influence, how the Australia Post Group conducts business.

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

4.3 Suppliers

The fair and open relationships we have with our suppliers are 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. wherever possible, avoid any relationship – financial or otherwise – with potential or existing suppliers, as this could influence your judgement, or be seen that way. If such a relationship cannot be avoided, you must ensure that you take all possible steps to avoid making commercial decisions and/or being involved in decision-making processes that may generate personal gain, or gain for someone who you have a personal relationship with
- 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
- e. where possible, not engage in supplier relationships that have the potential to compromise Australia Post's integrity or standing in the community.

4.4 Probity in Government Sales and Procurement

Probity in a commercial arrangement means the application of ethics that ensures impartiality, accountability and transparency in any contracting or tendering process. 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

Conflicts of interest and ethical behaviour

4.4.1 It's your responsibility to:

- a. ensure integrity throughout the entire contracting or tendering process
- b. make sure all proposals or evaluations are assessed objectively and consistently and in accordance with the documentation issued
- c. ensure all confidential information is kept secure and managed in accordance with legislative and Freedom of Information requirements
- d. promptly address any potential, perceived or actual conflicts of interest prior to commencement, and throughout, the contracting or tendering process
- e. promote defensibility, justification and transparency in all contracting or tendering processes.

4.5 Outside employment and associated activities

4.5.1 It's your responsibility to:

- a. only engage in outside paid or unpaid 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 an actual, potential or perceived 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:

- a. 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
- b. engage in outside employment without first receiving written consent from an authorised representative of the Australia Post Group.

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 Conflicts of interest and ethical behaviour

4.6 Bribery and corruption

Australia has strong laws against bribery and corruption – 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. offer or accept bribes, pay-offs, facilitation payments (payments to speed up routine government transactions), secret, unjustified or inflated commissions, kickbacks or any other like payments or improper benefits to any person or entity (including Public Officials)
- b. engage in any conduct that constitutes bribery or corruption
- c. 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 role in the community.

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

5.1 Environmental sustainability

5.1.1 It's your responsibility to:

- a. follow environmental regulations, along with the Australia Post Group's environmental policies and procedures
- b. follow applicable procedures for any environmental incidents
- c. talk to your manager if you identify any environmental risks
- d. consider any potential environmental impacts and risks, both positive and negative, when making investment decisions, developing plans and strategies, and purchasing goods and services
- e. responsibly manage waste, prioritising reuse and then recycling
- f. responsibly use resources like water, electricity and fuel.



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 and keep 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. efficiently use Australia Post Group's resources in a way that promotes the proper use and management of our assets and resources, and meets the expectations of the Australian community
- e. return all Australia Post Group property if you're no longer working with us.



Assets include (but aren't limited to) our money, computer systems, software and plant (for example, motor vehicles, machinery, furniture and tools).

Resources include Australia Post Group corporate credit cards, consumables (like fuel, paper and printer cartridges) and the paid work time of our Workforce Participants.

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 or recklessly 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 written 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.

6 Using corporate property

6.2 Intellectual property

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

We protect our intellectual property – and respect the intellectual property 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 ensure our rights to it are protected
- c. ensure you have the correct 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. preparing material that uses text or graphics created 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.

6.2.3 It's not acceptable to:

- a. download photographs or information from the Internet, copy part of a book or otherwise use any other party's intellectual property without an appropriate licence or permission, even if it is for internal use only
- b. allow other parties, including customers, to use any Australia Post Group branding or any other materials owned by Australia Post Group without the appropriate written permissions in place.

6.3 Expenditure

6.3.1 It's your responsibility to:

- a. ensure any expenditure you engage in, or approve, on behalf of the Australia Post Group is:
 - i. in accordance with the Australia Post Group policies
 - ii. represents the proper use and management of Australia Post Group's resources. This means that the expenditure should be efficient, effective, economical and ethical.
- b. talk to your people leader if you have any questions or doubts about whether any expenditure you're involved with might not meet these criteria.

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 especially 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 or personal information, including customer payment card details, if you're authorised to do so – and if the business needs that information
- f. return Australia Post Group records to us before finishing up your employment or engagement

- g. 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.



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.



Privacy, confidentiality and public comment

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

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 that could be used to identify an individual or where someone could reasonably work it out. If you can identify the individual by using the information, then it and all the associated information is personal information.

8.1 Business, customer, supplier and personnel information

8.1.1 It's your responsibility to:

- a. follow our privacy, data and use, records, information security and cyber policies, standards and procedures when handling personal information
- b. arrange for commercial partners to sign confidentiality agreements 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
- 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 management straight away and to the Privacy team 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 Privacy team for advice.

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 Communications team by contacting media@auspost.com.au. This 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 People & Culture team. These people can tell you more about the policies and procedures that apply to your work. They’ll also be able to answer any questions you have about our ethical standards.

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. 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. This 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, but are not limited to:

- discrimination – for example, based on gender, race, religion, or pregnancy
- harassment – including sexual harassment, sex-based 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 person(s) concerned if it's appropriate and safe to do so
- discussing it with your people leader, principal contractor or licensee
- asking a member of our People & Culture 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, but are not limited to:

- actions involving substantial risk to the health and safety of others, including, for example, harassment, sexual-harassment, sex-based harassment, discrimination, bullying, victimisation, vilification and hostile work environments
- 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 Group Security, call the HDB Hotline on 1300 116 947, raise a request via the People Services Portal or make a report via the Australia Post Group Our Ethics and Whistleblower Reporting Service.

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 Australia Post Group Our Ethics and Whistleblower Reporting Service on 1800 799 353 or log a report online.

If your report is made on reasonable grounds, it'll be documented and promptly investigated, either internally or in some cases by external agencies. We'll share with you the outcome(s) 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 people involved.

10

Are you concerned about somebody else's behaviour?

Suspected criminal behaviour

Examples of suspected criminal behaviour include:

- stealing, tampering or withholding mail
- obtaining a financial advantage or property by deception (i.e. fraudulent activity)
- falsification of documents and false accounting
- assault
- theft
- stealing property and/or cash.

The Australia Post Group Security team will review instances of suspected and detected criminal behaviour in the Australia Post Group to determine the level of investigation required. Where appropriate, matters may be referred to the relevant 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.

Index

- Absences, 11
- Alcohol, 8, 9
- Assets and resources, 22, 27
- Attendance, 11
- Benefits, 17, 18, 20
- Betting, 12
- Bribery and corruption, 10, 17, 20
- Bullying, 13, 14, 27
- Competitors, 14, 15, 17
- Confidential information, 19, 24, 25
- Confidentiality agreement, 25
- Conflict of interest, 16, 17, 18, 19, 20
- Corporate clothing, 11
- Corporate credit card, 22, 23
- Corporate property, 10, 19, 22, 23
- Corporate records, 24
- Corporate Responsibility, 21
- Criminal behaviour, 6, 11, 12, 27, 28
- Customer service, 11, 13
- Discrimination, 13, 14, 27
- Drugs, 8, 9
- Employee Assistance Program, 26
- Environmental Sustainability, 21
- Equal employment opportunity, 13
- Expenditure, 11
- Fair competition, 14, 15
- Favouritism, 16, 17
- Fraud, 28
- Gambling, 12
- Gifts, 17, 18
- Government Business Enterprise, 6, 10
- Harassment, 13, 14, 27
- Hazards, 8
- Hospitality, 17, 18
- Improper behaviour, 10, 18, 20, 27, 28
- Intellectual property, 23
- Intimidation, 12, 14, 16, 28
- Laws and regulations, 10
- Outside employment, 19
- Policies, 6, 7, 13, 14, 17, 21, 23, 25
- Prejudice, 16, 17
- Privacy, 25
- Property damage, 12
- Protective equipment, 8
- Public comments, 25
- Recruitment, 16
- Reputation, 7, 12, 14, 16, 17, 18, 19, 20, 25, 27, 28
- Safe working practices, 5, 8, 9, 11, 12, 13, 19, 22, 25, 26, 27
- Serious Misconduct, 11, 27, 28
- Sexual Harassment, 13, 14, 27
- Smoking, 9
- Social Media, 14, 15, 22, 25
- Suppliers, 12, 13, 15, 16, 17, 18, 25
- Theft, 10, 25, 28
- Threats, 14
- TIES values, 5
- Victimisation, 13, 28
- Whistleblower, 11, 27
- Work performance, 7, 8, 10, 11, 12, 13, 14, 16, 19, 26
- Working overseas, 10

Now you've read Our Ethics, it's time to put it to work

After all, making Our Ethics a part of our everyday work and culture means we can protect and strengthen our reputation – and continue to run a successful organisation where everybody thrives.

If you'd like to run through anything in this booklet, ask your people leader, principal contractor or licensee.



Australia Post

Key contacts

Contact	Number	Email
People Services Team	1300 116 947	
EAP, WAP and Manager Assist	1300 687 327	
Privacy and data breaches		privacy@auspost.com.au
Australia Post Group Our Ethics and Whistleblower Reporting Service	1800 799 353	
Ethical Behaviour		EthicalBehaviour@auspost.com.au
Report a Security Incident	1800 621 621	nscc@auspost.com.au
Report a Suspected or Detected Fraud		fraud@auspost.com.au
Secure at Post – Cyber security		secureatpost@auspost.com.au

Policy Support and Administration
Policy Sponsor: EGM People & Culture
Policy Owner: General Manager, Employee Relations

Version Number: V 5.1

Approved By: The Board Approved

On: 20 May 2024

Effective Date: 20 May 2024

Next Review Date: May 2027

Classification: INTERNAL