

Our Code of Conduct



Approved by AEMO Board: 22 March 2024



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Message from CEO



Colleagues,

At AEMO our purpose is to ensure safe, reliable and affordable energy today, and enable the energy transition for the benefit of all Australians.

What we do every day at AEMO impacts on the lives of all Australians. It is a privilege to work with this purpose, but with this privilege also comes both responsibility and accountability.

Because of the type of work we do, we need to make sure we maintain the highest standards. These standards are articulated in our updated code of conduct.

The updated code of conduct sets out the basic standards of behaviour for all people representing our organisation. This covers employees, directors, contractors and consultants. Whether you work in operations, digital, AEMO Services or Transmission Company Victoria, it is designed to help you do your job.

We are all accountable to uphold the standards set out in the code of conduct. If you think these standards are not being upheld, please speak up.

We all have a responsibility to make sure this code is treated seriously, and any breach is called out and acted upon. And also to remind each other that failing to comply with the code is a serious matter that may lead to disciplinary action.

Please take the time to read our code.

Stay safe,

Daniel Westerman

Chief Executive Officer



Our values

Character. Connection. Commitment.

Our values articulate the core set of beliefs and behaviours that guide how we work. These values are central to delivering on our purpose, vision, and strategic priorities.



Character

Be our best

We bring our professional expertise to make a difference

We consistently strive to be better

We thrive on the tough challenges

We are flexible and pragmatic

We are honest and authentic

We are inclusive and value difference



Connection

Better together

We work as one team across the AEMO group

We actively engage with colleagues and stakeholders

We prioritise the safety and wellbeing of ourselves and others

We build trust and trust others

We support and learn from each other

We challenge respectfully and constructively



Commitment

Make it happen

We put the needs of consumers and communities at the core of our thinking

We balance evidence, timeliness, cost and risk

We set clear goals, take ownership and do what we say we will do

We find better ways to get things done

We are transparent and responsive

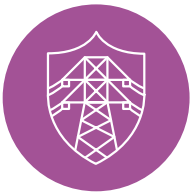
We invest in our people

Code of Conduct key principles

Our Code of Conduct aligns with AEMO's purpose and builds on our values, with five key principles that guide us in making the right choices in how we act, solve problems and make decisions.



We respect ourselves and others



We are committed to protecting the security of energy for all Australians



We put people at the centre of the energy transition



We act with character and behave professionally



Speak Up! We are all accountable for upholding our Code of Conduct



We respect ourselves and others

At AEMO, we are committed to creating a workplace where every individual feels safe, valued and supported. We prioritise wellbeing and inclusion, fostering an environment where everyone can thrive, free from bullying or discrimination.

- **Diversity, equity and inclusion**
- **Safety, health and wellbeing**
- **Bullying, discrimination and harassment**



We respect ourselves and others

Diversity, equity and inclusion

AEMO aspires to be a workplace where everyone feels safe, supported and fully engaged with AEMO's work, so we can harness 100% of their talent and they can reach their full potential and thrive.

We are committed to supporting all people and to making AEMO more reflective of the wider Australian community we serve.

We embrace and celebrate our differences and strive to excel in creating inclusive teams.

We aim to empower all our people by actively addressing the barriers to equality and creating a level playing field.

What we expect of you

- Treat yourself and others with dignity, fairness, equity and without discrimination.
- Value and respect each other's contribution by inviting each person's unique contribution and encouraging diversity of thought.
- Demonstrate fairness and respect in your dealings with everyone.
- Treat all people fairly based on their skills and capabilities and provide equal opportunities.
- Speak Up! and challenge and call out biases and unfair behaviour.

Other resources

- Diversity, Equity & Inclusion Policy
- Mo – Diversity, Equity & Inclusion page





We respect ourselves and others

Safety, health and wellbeing

Our people are at the heart of what we do, and we are committed to providing a workplace that supports everyone's safety, health and wellbeing.

It means we take care of ourselves and each other and speak up if we don't feel things are okay.

Protecting people's health and safety is **everyone's responsibility** at AEMO. Taking care of ourselves and each other allows us to reach our full potential and feel safe and protected in the workplace.

We encourage everyone to regularly discuss any opportunities on how to improve health, safety and wellbeing at AEMO.

What we expect of you

- Take proactive responsibility and care for your own safety and the safety of others.
- Adhere to AEMO policies, procedures and systems relating to safety, health and wellbeing.
- Speak Up! and identify and report all hazards, near misses and incidents in the workplace and, where possible, make the area safe for others.
- Model safety and wellbeing for your team, colleagues, consultants, contractors and visitors.
- Ensure you are not under the influence of drugs or alcohol when attending the workplace or performing work-related activities.
- Only attend and perform work duties when fit for duty, without imposing health and safety risks on yourself or others.
- Use equipment safely and in the correct way.
- Use Personal Protective Equipment (PPE) where necessary.
- Read and understand all relevant safety manuals and safety management plans.
- Complete any required safety, health, and wellbeing training.

Other resources

- Work Health, Safety and Environment Policy
- Drug & Alcohol Policy





We respect ourselves and others

Bullying, discrimination and harassment

At AEMO, we have zero tolerance for bullying, discrimination, harassment, sexual harassment, violence, abuse and victimisation of any form.

We all have a positive duty and responsibility to ensure AEMO is an environment free of unlawful discrimination, harassment, sexual harassment, victimisation and bullying.

This applies to all work-related activities and interactions, whether during or outside business hours or away from AEMO premises (including when working from home or remotely).

This also extends to the use of communication platforms and social media outside of work hours, to the extent that it impacts on the workplace or working relationships between people.

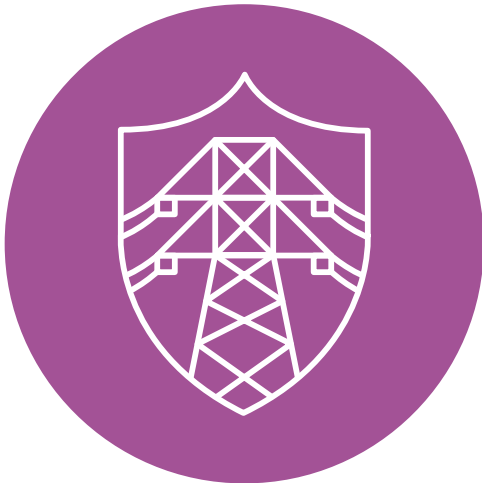


What we expect of you

- Actively promote a work environment that is free from harassment, violence and bullying.
- Not engage in any forms of bullying, discrimination, harassment, sexual harassment, violence, abuse or intimidation of any kind.
- Immediately report instances of discrimination and harassment you experience or witness, including reporting any possible hazards or risks.
- Support a colleague to Speak Up! if they experience discrimination, harassment or bullying.
- Familiarise yourself and act in line with our Bullying, Discrimination and Harassment Policy.
- Complete all required bullying, discrimination and harassment training.

Other resources

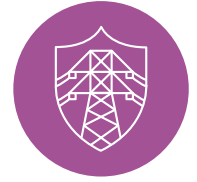
- Bullying, Discrimination and Harassment Policy



We are committed to protecting the security of energy for all Australians

We are dedicated to protecting the security of energy for all Australians, safeguarding critical information through a strong commitment to confidentiality, privacy, and security. This extends to ensuring that we comply with laws and regulations, cybersecurity practices and the responsible use of our systems.

- **Confidentiality and privacy**
- **Cyber security**
- **Use of systems, devices and applications**
- **Laws and regulations**



We are committed to protecting the security of energy for all Australians

Confidentiality and privacy

AEMO has access to confidential participant, stakeholder and supplier information, including information that is personal or commercially sensitive. These stakeholders expect that AEMO will respect and safeguard the confidential information in our care.

We are all responsible for protecting AEMO's confidential information. Everyone must protect all confidential information and you must not, at any time, use or disclose it except as authorised in the performance of your duties.

This obligation continues even after your engagement with AEMO ends.

What we expect of you

- Keep information secure and protect it from risk of unauthorised access.
- Adopt appropriate security controls for information labelled as confidential or commercially sensitive (e.g. access management, encryption, storing physical printouts in a secure location).
- Speak Up! and immediately inform your People Leader and the Compliance Group if you become aware of any unauthorised use or disclosure of confidential information.
- Keep information confidential unless you are required by law to disclose it.
- Only access personal and confidential information if you are authorised to do so.
- Never use confidential information for personal gain.
- Complete all confidentiality and privacy training.
- When in doubt, contact your People Leader or a member of the Legal or Compliance Team.

Other resources

- Confidential Information Policy
- Privacy Policy
- Mo – Privacy Page





We are committed to protecting the security of energy for all Australians

Cyber security

Be cyber wise – don't compromise!

Cyber security is important in achieving a secure and resilient energy future for all Australians.

Protecting AEMO's IT systems, information and business processes from significant cyber-related disruptions or data breaches is everyone's responsibility.

The actions of all of us can protect AEMO from being compromised and suffering damage from a cyber attack.

The way you work with information and systems in your day-to-day activities matters, to safeguard AEMO from such events.

What we expect of you

- Use AEMO systems, technology and data in a cyber security-conscious way.
- Follow protocols and practices implemented to protect our IT Systems and Information.
- Speak Up! and immediately report cyber security incidents, data breaches or concerns to the AEMO Information and Support Hub on 1300 236 600.
- Report suspicious or 'Phishing' emails and documents.
- Keep informed about cyber security issues and prevention measures.
- Only request and/or approve access to systems to the level required for the role.
- Cooperate with cyber security investigations.
- Complete all required cyber security training.

Other resources

- Cyber Security Policy
- Mo – Cyber Page





We are committed to protecting the security of energy for all Australians

Use of systems, devices and applications

AEMO's systems and the information they contain enable and support the secure and reliable running of Australia's energy systems and markets. Therefore, these must be protected and used in an appropriate manner.

AEMO's systems are regularly monitored to protect the integrity of our technology, information and operations. This includes monitoring of AEMO computers, phones, internet usage and email and applications content.

Reasonable personal use of AEMO managed devices is permitted, however it must not present risks to AEMO systems, technology and data.

What we expect of you

- Use all AEMO systems, resources and equipment appropriately and for proper purposes.
- Only access AEMO systems, technology and data from within Australia, unless otherwise approved.
- Do not use AEMO systems to access sites or store information that could cause a risk (such as gaming sites, adult content, streaming services, gambling sites or others as identified by AEMO's IT Use Policy).
- Regularly update passwords and keep them private.
- Never allow someone to access systems using your username and password details.
- Do not use or store items on AEMO systems for private business.
- Do not use AEMO devices and platforms for purposes that are illegal, unethical or against AEMO's Code, policies or other rules.
- Enable AEMO's protective controls (for example, authenticator apps) on personal devices if you are accessing AEMO data and systems from these devices.
- Always use AEMO's IT systems in line with AEMO's Cyber Security Policy.
- Do not copy, download or store AEMO information on personal devices.
- Do not copy or store personal information on AEMO devices.

Other resources

- Cyber Security Policy
- IT Use Policy





We are committed to protecting the security of energy for all Australians

Laws and regulations

At AEMO, much of what we do is governed and supported by Australia's laws and regulations.

Each of us is required to respect and adhere to all laws and regulations that apply to AEMO's activities, as well as all AEMO policies, standards and procedures.

Due to the critical nature of the role AEMO plays in Australia, some of these laws require AEMO to provide regularly updated information to demonstrate our compliance and manage relevant risks. As a result, people at AEMO recognise they may need to regularly submit updated background checks (such as police, qualifications, and registration checks) and comply with relevant Probity principles and plans.

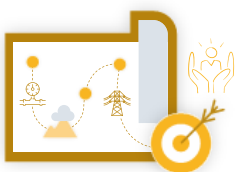
Upholding our commitment to legal integrity ensures we operate responsibly and within the bounds of the law, safeguarding AEMO's reputation and the interests of our stakeholders.

What we expect of you

- Follow applicable laws and regulations, including related procedures, processes, policies and directives.
- Complete requests for background checks as requested from time to time through your engagement at AEMO.
- When delivering activities such as tenders, comply with Probity principles, process and protocols.
- Do not knowingly or recklessly commit, or be a party to, or be involved in, any illegal activity.
- Understand all relevant laws and regulations that apply to your role or area of work.
- Complete all required training and compliance modules.
- Contact your People Leader or Legal team if you are unsure or require further guidance or information about the laws

Other resources

- Mo – Legal Centre page





We put people at the centre of the energy transition

To be effective in our role, AEMO must be a trusted partner and work closely with our stakeholders, including government, industry bodies, industry participants and Australian energy consumers. At AEMO, it is important to be honest and transparent in our communication and dealings. Upholding our reputation and fostering strong relationships with stakeholders are integral to our mission of serving the community effectively.

- **Upholding AEMO's reputation**
- **Politics and government**
- **Media, communications and social media**



We put people at the centre of the energy transition

Upholding AEMO's reputation

We are committed to living out our values of Character, Connection and Commitment, aligning our actions with the core principles that define AEMO.

In performing our duties, we guide our decisions with honesty, integrity and fairness to maintain AEMO's reputation.

Upholding our reputation means building and preserving the trust of our stakeholders and the community.



What we expect of you

- Act in a professional manner, performing our duties aligned with our values and with care and diligence.
- Never portray AEMO negatively or in any way which might cause harm to AEMO's reputation.
- Make business decisions in a fair, impartial and timely manner, considering all available information and compliance obligations.
- Wear any AEMO uniform/clothing neatly.
- Refrain from engaging with people or businesses that are not aligned with AEMO's values where the association may compromise or harm AEMO's reputation.

Helpful questions to ask yourself

To assess whether there is an impact to AEMO's reputation, ask:

- Would my action or behaviour cause me to question whether this is 'the right thing to do'?
- How would the public react to my or my team's behaviour?
- What impression would the behaviour leave on our stakeholders?
- Would I be embarrassed if I saw my behaviour replayed in a video on social media?
- Is my action or behaviour aligned to our Corporate Plan and/or Strategic Objectives?



We put people at the centre of the energy transition

Politics and government

Because AEMO plays a critical role within the energy industry, all employees must exercise discretion and good judgement when engaging with governments and regulators on behalf of AEMO.

AEMO is a public company limited by guarantee, with our membership being a combination of Australian federal and state governments and industry participants.

AEMO is independent and apolitical and operates within a framework of energy laws and rules.

What we expect of you

- Ensure all information provided to governments, regulators and public authorities is accurate and appropriate.
- Remain constructive, honest and transparent when engaging with stakeholders.
- If participating in political activities, you must make clear that you are speaking and acting as an individual, and not engage or provide commentary in any activity that may give rise to a perceived conflict of interest for AEMO.
- Never contribute AEMO funds to any political activity, party or fundraising.
- Refer any queries from government officials that fall outside scope of your role to your People Leader.
- Complete all required stakeholder engagement training.

Other resources

- Reach out to the Stakeholder Engagement Team





We put people at the centre of the energy transition

Media, communications and social media

Today, there is an infinite amount of media and communication tools, including social media, which can be invaluable to share our values, strategy and culture internally and to showcase our business externally.

When communicating inside or outside of AEMO, whether it is on behalf of AEMO or in a personal capacity, we must represent the company in an appropriate manner and in line with our brand and values.

This way, we can work together to uphold AEMO's reputation as an apolitical and impartial organisation.

What we expect of you

- Act in a way that promotes and does not harm AEMO's best interests and reputation.
- Always act responsibly and respectfully when using social media for personal or professional use.
- Ensure that any information released to the public is approved and in line with relevant policies and procedures.
- Refer any media enquiries to AEMO's Media team at media@aemo.com.au.
- Never make any comments to the media unless authorised by the AEMO Media Team.
- Avoid presenting your personal views as those of AEMO, including presenting personal views where it could be associated with AEMO in any media, including social media.
- If you are making comments about AEMO, please ensure you clearly identify that you work for AEMO.
- Never portray AEMO negatively or in any way which might cause harm to AEMO's reputation.

Other resources

- Social Media Policy
- Media Policy





We act with character and behave professionally

At AEMO, we hold ourselves to the highest standards of ethical conduct and professionalism, ensuring our actions are guided by integrity and transparency.

- **Conflicts of interest**
- **Secondary employment**
- **Gifts and hospitality**
- **Financial management**



We act with character and behave professionally

Conflicts of interest

We all have a responsibility to always act with integrity and in the best interests of AEMO. This means ensuring your personal interests do not conflict with your responsibilities as an AEMO employee.

A conflict of interest may occur when a work decision fulfils or appears to fulfil a personal favour, or provides or appears to provide a benefit to you, an associate or a relative.

Our personal interests should not conflict with our duties and obligations at AEMO, and we must not allow any actual, potential or perceived conflict of interest to affect our operations, decisions or reputation.



What we expect of you

- Avoid and/or manage actual, potential or perceived conflicts of interest appropriately.
- Do not use your employment status to seek personal gain.
- Do not be involved in hiring, promoting, or directly supervising a relative or someone you have a close personal relationship with.
- Declare potential, perceived, or actual conflicts of interest to your People Leader immediately and record details on relevant database.
- Declare any active personal political associations (e.g. a member of a political movement/campaign).
- Do not use price-sensitive information obtained through your work at AEMO to deal in shares or other commercial activities.
- Seek clarification if you are unsure if something might constitute a conflict of interest.

Helpful questions to ask yourself

To assess whether there is a conflict or an appearance of a conflict of interest, ask:

- Is the decision I make for our company influenced by personal interests?
- What impression would the situation leave on third parties, such as customers, business partners, and members?
- How would the public react to the business decision?



We act with character and behave professionally

Secondary employment

As an AEMO employee, you must not hold any outside employment which conflicts with the duties you undertake for AEMO.

Prior consent from AEMO must be given if employees wish to undertake or assist in any other employment, business or profession.

Approval should be sought for any Board positions (paid or unpaid) or any position that may have a connection with the energy sector or other relevant industries reasonably connected to AEMO.

You require pre-approval to undertake other employment (paid or otherwise) while on paid or unpaid leave from AEMO.

Employees are expected to prioritise their working arrangements with AEMO, and approval can be withdrawn if AEMO feels other employment is interrupting performance and delivery.

What we expect of you

- Seek approval from AEMO if you wish to undertake any secondary employment.
- Comply with confidentiality obligations and conflict of interest policies.

Other resources

- HR Delegations Policy





We act with character and behave professionally

Gifts and hospitality

Employees must not seek, offer or accept any gifts, benefits or hospitality that fall outside AEMO's Gifts Policy. Doing so may create a conflict of interest, which can undermine AEMO's reputation and business effectiveness.

These activities must be carefully considered and managed so they are not perceived as influencing business decisions or creating conflicts of interest, and do not create an adverse impression of how AEMO does business.

What we expect of you

- Appropriately report gifts accepted.
- Do not accept cash gift or gifts which might influence, or be seen to influence, ethical business judgement.
- Register all gifts or hospitality by emailing giftandhospitalityregister@aemo.com.au.
- Seek approval from your People Leader to accept a gift or hospitality with a nominal value between \$100-\$200.
- Seek approval from your Group Manager or ELT member to accept a gift or hospitality with a nominal value over \$200.

Other resources

- Gifts Policy





We act with character and behave professionally

Financial management

AEMO is an independent, not-for-profit organisation, funded by energy market participants.

We recognise our responsibility to be economical and to use resources prudently and effectively, and to be transparent and accountable.

To avoid financial and reputational damage to AEMO, we must be transparent in our financial dealings and ensure the integrity of AEMO's financial practices.

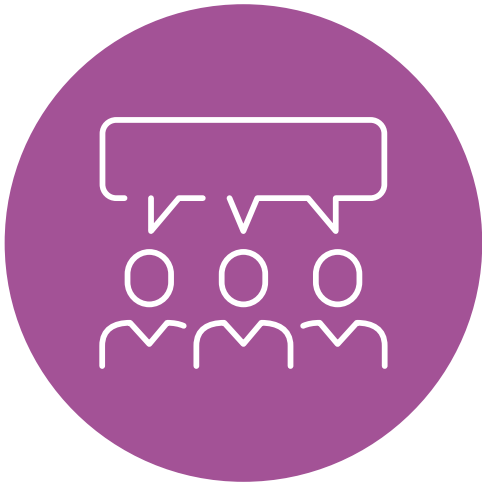
What we expect of you

- Responsibly handle funds in line with financial policies, processes and systems.
- Act within the scope of your financial delegated authority.
- Ensure all financial information and records provided by you are true and accurate.
- Use company credit cards in line with our Corporate Credit Card Policy, and not for personal purposes.
- Speak Up! and report any instances or suspicions of fraud and/or money laundering.
- Complete all required financial management training.

Other resources

- Fraud and Corruption Prevention Policy
- Corporate Credit Card and Expense Reimbursement Policy





Speak up! We are all accountable for upholding our Code of Conduct

We have a collective responsibility to adhere to our Code of Conduct, and we encourage everyone to actively voice any concerns they may have, fostering an open and accountable culture where integrity is paramount.

- [Breaches of the Code](#)
- [Obligation to report](#)
- [Whistleblower details](#)
- [Further guidance](#)



Speak Up! We are all accountable for upholding our Code of Conduct

Breaches of the Code

AEMO treats any breach of the Code of Conduct seriously. Failing to comply with the Code is a serious matter that will be addressed and may lead to disciplinary action. This includes failure to report a breach of the Code where an employee is aware of such breach.

Disciplinary actions depend on the seriousness of the breach and the circumstances leading to the breach. Disciplinary outcomes can include:

- Warnings
- Suspension
- Termination of employment or engagement
- Civil or criminal action, where the breach includes a violation of the law.

Using good judgement

- The Code cannot describe or anticipate every law, so it is important to understand its intent and apply common sense.
- AEMO expects you to exercise good judgement and act ethically and honestly.
- If you are unsure about how to interpret the Code, or have concerns about how it is being applied, we encourage you to raise these with your People Leader.

Other resources

- Discipline Policy





Speak up! We are all accountable for upholding our Code of Conduct

Obligation to report

To play your part in raising concerns about Code breaches, there are several different options available to everyone at AEMO. We all have an obligation to report any unethical or illegal behaviour, so if you experience or observe conduct that is, or might be, contrary to this Code or AEMO's values, we encourage you to speak up as soon as possible.

AEMO has a responsibility to protect those who report unethical behaviour or wrongdoing, provided a report is based on a reasonable belief.

How to report a breach

Who you should notify will depend on the circumstances of the breach. In most cases you should raise breaches of the Code, the law or policies and procedures with your:

- People Leader
- People Hub
- Your Executive Leader
- EGM People & Culture
- For a whistleblower disclosure, you should use STOPline.

Other resources

- Whistleblower Protection Policy and Procedure
- Grievance Policy





Speak up! We are all accountable for upholding our Code of Conduct

Whistleblower details

STOPline is AEMO's confidential and independent whistleblower service. It operates 24/7 and is authorised by AEMO to receive notification of any disclosures.

If you wish to make a report anonymously, you can raise concerns with STOPline.

Speak up

You can contact STOPline via:

- Telephone: 1300 304 550
- Email: aemo@stopline.com.au
- Post: C/- STOPline, PO Box 403, Diamond Creek, Victoria 3089
- Website: <https://aemo.stoplinereport.com>

Other resources

- Whistleblower Protection Policy and Procedures





Speak Up! We are all accountable for Upholding our Code of Conduct

Further guidance

Sometimes things are still unclear – in these cases, please speak with your People Leader or contact People Hub for further guidance.

If you have any queries or suggestions for improvement, email people.hub@aemo.com.au.

AEMO Code checklist

Before you act, ask yourself:

- Is this an honest decision?
- Am I making this decision professionally, fairly and compassionately?
- Who or what may be affected by my decision?
- Would I like to be treated in the same manner?
- Is my decision or action consistent with AEMO's values?
- Could I justify the decision or action to my friends and family?
- If you are ever unsure about your responsibilities or a work-related issue, ask your People Leader or supervisor.