



# Code of Conduct



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# Introduction from our CEO

Here at Contact we have a fantastic, highly engaged team focused on delivering strong performance and opportunities for growth as we continue to create a better Aotearoa New Zealand.

Our **Tikanga** – which underpins our Code of Conduct – is our compass, expressed as a series of commitments, principles and behaviours. It guides the actions we take, as individuals and as a whole organisation.

It's important to us that our people, and all our stakeholders, know that we put our Tikanga at the heart of everything we do. That we hold ourselves to account to act with integrity in all our dealings. This Code is a statement of those expectations.

You need to read and understand our Code of Conduct, to speak up or 'ReportIt!' when you have any concerns, and to help us keep Contact a safe, healthy and positive place to work and to do business with.

A handwritten signature in black ink, appearing to read 'Mike Fuge'.

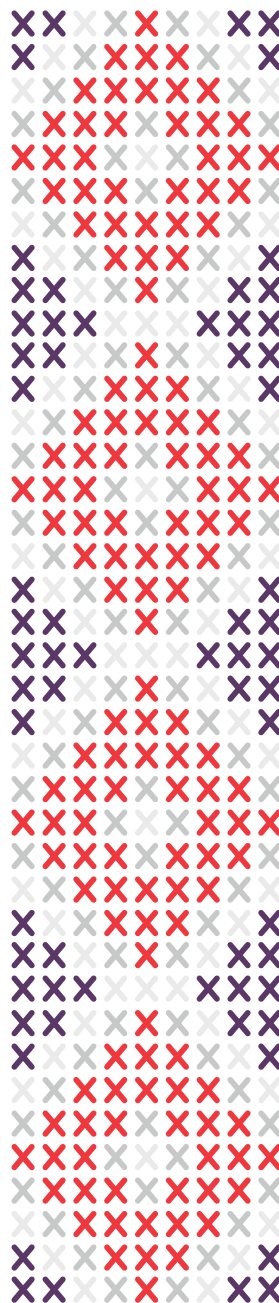
**Mike Fuge**  
Chief Executive Officer



## Our Tikanga

We touch lives to make life better. What we believe in, our Tikanga, guides how we bring our purpose to life. It's our set of beliefs and values, expressed as a series of Principles and Commitments. Our Tikanga underpins our behaviour and the way we do business at Contact.

Contact expects all of its people to act honestly, with integrity, in Contact's best interests and in accordance with the law all of the time. People acting on Contact's behalf are expected to comply with our policies, guidelines, directives and procedures and always act conscientiously, reasonably and in good faith, having regard for their responsibilities, the interests of Contact, and the welfare of our customers, colleagues and communities.



## About our Code of Conduct

### What is our Code of Conduct?

This Code of Conduct is our core policy document and it applies to everyone working for Contact. We need you to understand and follow its principles and requirements. There are other important Contact policies that will also apply to you, so please make sure that you're familiar with them.

Contact will support you by providing training on the Code. We encourage you to talk to your people leader if you need further guidance.

### What are the consequences of not complying with the Code?

All Contact people are expected to comply with the Code of Conduct and the policies it incorporates. Non-compliance with this Code or policies may be managed using Contact's Coaching and Discipline Guide.

Any known or suspected instances of non-compliance should be discussed with your manager, your Leadership Team member, or the General Counsel. You can also report a breach of this Code under our Whistleblowing Policy and on our ReportIt! site. Details of any issues reported may be passed on to the Board. Directors may bring any breach to the attention of the Chair of the Board or the Chair of the Audit and Risk Committee.



# Our principles

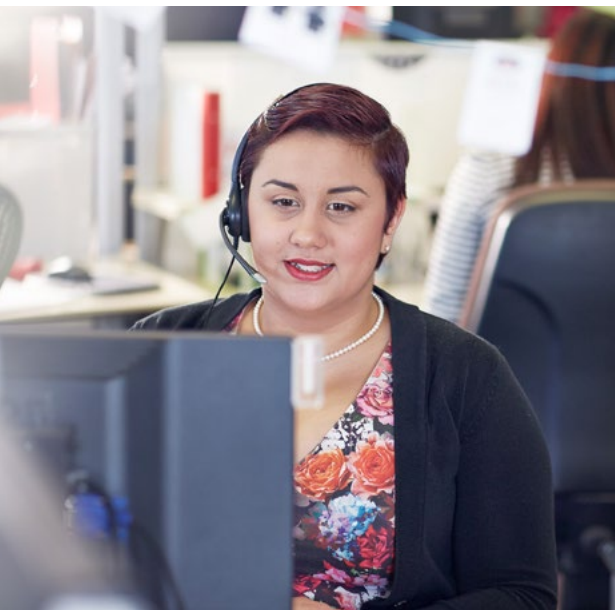
**1. We act professionally** at all times, in accordance with laws and regulations.

**2. We care deeply** about the health and safety of our people and strive to minimise any health, safety and environmental impacts on our customers and communities.

**3. We put our energy into things that really matter** by:

- Creating value from the resources that come under our control.
- Being inclusive, encouraging diversity and expression of ideas and opinions (in line with our Commitments and Behaviours).
- Ensuring the sustainability of our business.
- Taking care of the environment by looking after our natural and shared resources.
- Being a good neighbour in the communities where we operate.
- Being authentic.

**4. When faced with choices, we make sound decisions** knowing they will be subject to scrutiny.



## Our commitments

**Creating value** for our customers and communities by developing smart solutions that make living easier for them now, and in the future.

**Creating a rewarding workplace** for our people by valuing everyone's contribution, encouraging personal development, recognising good performance and fostering equality of opportunity.

**Respecting the rights and interests** of communities by listening to them, and understanding and managing the environmental, economic and social impacts of our activities.

**Being respectful** of the rights and interests of our business partners so we work collaboratively to create valued, rewarding partnerships.

**Delivering market-leading performance** for shareholders by identifying, developing, operating and growing value-creating businesses.

**Staying a step ahead**, anticipating the things that are going to matter. Not just to our business, but to New Zealand.





# Our behaviours

We're inspired by innovation. We stay a step ahead: we're authentic, empathic and brave.

We genuinely care about making life better for our customers, our communities and each other. We are purposeful in everything we do. And we make sure that everything we do, we do with integrity, to maintain the trust of our customers, colleagues, business partners and communities.



## Curiosity propels us

We're inspired by innovation. Driven by the great "What If". The better way. This makes us look under every rock. Consider things from every angle. It sets us apart and moves us forward.



## Progressive defines us

The future belongs to those who are prepared. So we stay a step ahead by keeping an eye firmly on the horizon. Anticipating the things that are going to matter. Not just to our business, but to New Zealand. We're inclusive, authentic, empathetic and brave.



## Human kindness connects us

We genuinely care about making life better for our customers, our communities and each other. Understanding problems and finding smart solutions. Treating others how we'd like to be treated ourselves. Nothing matters more than people.



## Pointed focus sharpens us

We are purposeful in everything we do. We fixate on the things that matter. And filter out the things that don't. Because our purpose is to touch lives, to make life better.



A man and a woman, both wearing red jackets with the 'contact' logo, are kneeling in a field of wood chips. The woman is holding a small green plant in a black pot, and the man is holding a red shovel. They are both smiling at the camera. In the background, there are several colorful tents and a line of trees under a cloudy sky.

# Working for Contact



# Flexible mahi

Contact supports flexible mahi, where feasible, as part of our Transforming Ways of Working Programme which includes how we work, where we work and what we work on.

We encourage you to talk to your people leader to find a way to mahi that works for you, your team and the wider business.

This means that we:

- work together with our people leaders to agree our individual flexible mahi arrangements, depending on our role (and make a formal application where the arrangement will affect our pay or rosters)
- work from a place that is safe, secure and benefits our people and the business
- commit to working our agreed hours
- are available during agreed work hours and days so that we're contactable and able to meet work requests.



## Preferred contact

People Experience Business Partner



## For further information

see our **Flexible Mahi Guide**.

**Q:** Does the flexible mahi framework replace the legislative Flexible Working Arrangements?

**A:** No, our framework provides benefits over and above the legislative arrangements (which can be found [here](#)).

**Q:** If my particular situation isn't covered in the flexible mahi guide, can I still apply for flexible working?

**A:** We've tried to address most situations in the guide, but we may not have covered everything. If your situation isn't covered, please have a chat with your people leader about how we can support you.



# Diversity and inclusion

At Contact, we believe an inclusive culture and diverse workforce leads to diversity of thought, better decision-making, stronger business performance and a better world.

We aim to provide an equitable work environment where inclusion is deeply embedded in our mahi and our Tikanga, and our people feel able to be their true selves.

This means that we:

- strive to create an inclusive and diverse workplace environment in which differences in gender, age, disability, ethnicity, religion, sexual orientation, gender identity, background and experience are valued
- actively seek opportunities to ensure we develop a diverse workforce that reflects Aotearoa
- foster a respectful and considerate workplace.



**Preferred contact**  
People Experience Team



**For further information**  
see our **Inclusion and Diversity Policy**.

**Q:** What should I do if I hear a colleague speaking in a derogatory way about someone's ethnicity/gender/sexual orientation etc?

**A:** This kind of behaviour is not acceptable and you should challenge it if you feel comfortable to do so. You should also raise it with your manager or the People Experience team or alternatively make a report – either anonymously or non-anonymously – through the SharePoint **ReportIt!** Page.

**Q:** I've witnessed some inappropriate behaviour at work, but I'm not sure if it would be considered harassment, bullying or discrimination, what should I do?

**A:** Harassment, bullying and discrimination can take place in many different forms, there are outlined in our **Dealing with Bullying, Harassment and Discrimination Procedure**. If you think the behaviour you have witnessed falls under any of these definitions, it's important that you report it to your manager or the People Experience team or alternatively make a report – either anonymously or non-anonymously – through the SharePoint **ReportIt!** Page.

# Preventing harassment, bullying and discrimination

At Contact, we are committed to maintaining a positive working environment and culture, where everyone is treated in a respectful way.

We have zero tolerance of any form of discrimination, bullying and harassment. This applies whether this behaviour comes from, or is directed at, an employee, contractor, consultant, customer, supplier or a visitor to Contact.

This means that we:

- encourage our people to identify and report any instances of discrimination, bullying or harassment.
- treat all discrimination, bullying or harassment complaints seriously and ensure they are dealt with impartially, confidentially and within a realistic timeframe
- encourage people to challenge any discriminatory behaviour if they see it.



**Preferred contact**  
People Experience Team



**For further information**  
see our **Discrimination, Bullying and Harassment Prevention Policy**.



# Human rights

We are committed to ensuring that everyone is treated with dignity and respect. We operate in a manner consistent with internationally recognised human rights as laid out in the International Bill of Rights and the International Labour Organisation's Declaration on the Fundamental Principles and Rights at Work, and other established human rights principles and obligations.

This means that we:

- encourage everyone to bring their “best self” to work
- treat all people with dignity and respect and comply with all local laws which protect human rights and labour standards
- actively manage Modern Slavery risk across our business and supply chain
- work hard to be transparent in relation to human rights issues in all areas of our business
- provide channels for our people to report human rights issues within the business, and monitor, review and address the issues raised.



## Preferred contact

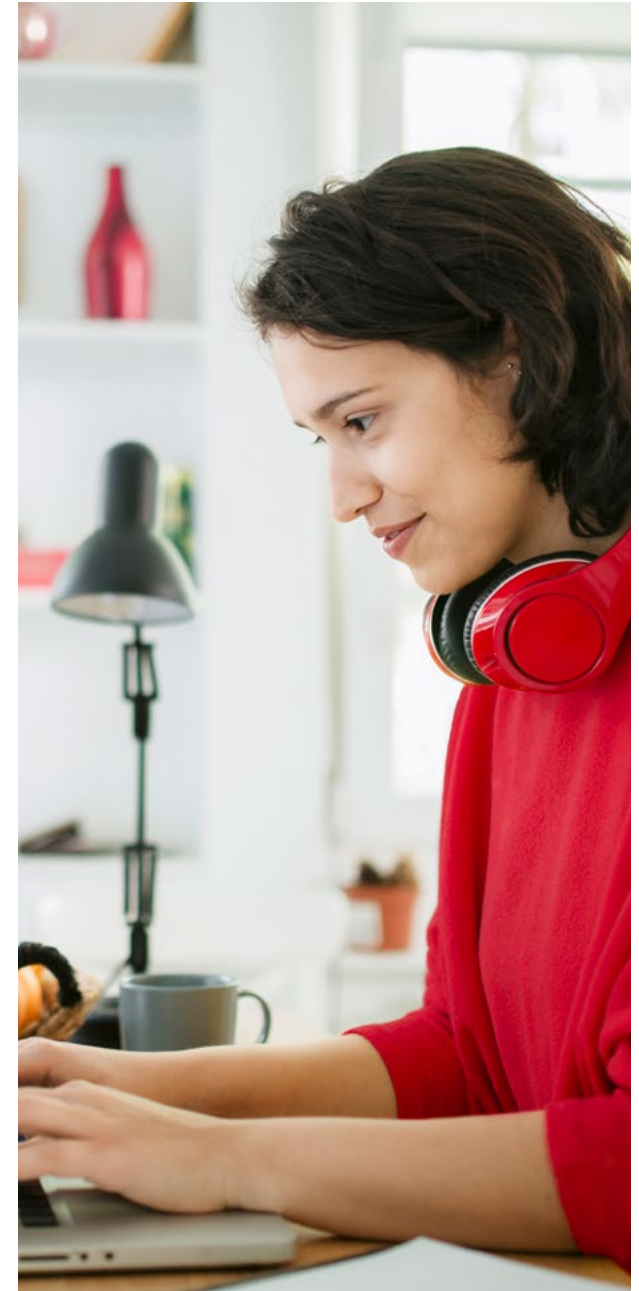
Legal Team, People Experience Team



## For further information

see our **Human Rights Policy**.

Don't forget, you can report an actual or suspected breach on **ReportIt!**



# Conflicts of interest

We have an obligation to act in Contact's best interests at all times. A conflict of interest can happen if other interests of a Director or employee compete, or appear to compete, with Contact's interests. These competing interests can be financial, non-financial, actual, potential or perceived.

You should read the **Conflicts of Interest Management Procedure** for more guidance on how to manage a conflict of interest.

This means that we:

- avoid any actual, potential or perceived conflict between our personal interests, and those of the business, wherever possible
- take responsibility for identifying and disclosing any actual, apparent, or potential conflict of interest
- always tell a manager about a conflict of interest if one does arise
- report a breach of the conflict of interest rules on ReportIt! (on our SharePoint homepage) or to the General Counsel for investigation and follow up.



**Preferred contact**  
Legal Team



**For further information** see our **Conflict of Interest Management Procedure** and **Conflict of Interest Management Plan Form**

## Directors

Directors must give proper attention to the matters before them. There are some specific rules for managing Director conflicts of interest, which are covered by our Board Charter, Constitution and legal requirements.

## These rules apply equally to:

- actual conflicts of interest (e.g. recruiting a relative)
- situations that look to an outside observer like a conflict of interest (e.g. working in the same team as your partner);
- situations that could develop into a conflict of interest (e.g. holding a second job).

**Q: How do I know if I have a conflict of interest?**

**A: Ask yourself:**

- Do my outside interests influence, or appear to influence my ability to make sound business decisions?
- Could I, or a friend or relative, benefit from my involvement in this situation?
- Could my involvement in this activity interfere with my ability to do my job?
- Is the situation causing me to put my own interests ahead of Contact's interests?
- If the situation became public knowledge, would that harm my reputation, or Contact's reputation?

**Q: What happens if I tell my manager that I have a conflict of interest?**

**A: Your manager will complete and approve an Interest Management Plan and send it to the General Counsel. One likely consequence is that you won't be able to make any decisions related to the matter you have an interest in.**



# Gifts and hospitality

We need to be careful when accepting or giving gifts, hospitality or entertainment in the course of our work. We need to ensure that we are never influenced by, or seek to influence others through, the giving or receiving of these benefits. It can be a grey area, so if you're unsure please talk to your people leader or ask a member of the Legal Team for guidance.

## Accepting gifts

Whether or not we should accept a gift depends on its type and value, and on the context. We can accept a reasonable and proportionate gift as part of normal business practice. This means that we need to consider:

- how this would look to someone outside Contact
- why the gift is being offered
- how often the gift is offered – small but frequent gifts can be of concern
- how valuable or beneficial the gift is.

As a general guide, hospitality to the value of \$250 is likely to be acceptable.

## Declining gifts

We should decline a gift if acceptance could be seen as compromising our judgement; unduly influencing us or creating a business obligation on our part; showing favouritism; or conflicting with our Tikanga. We should decline any gift offered by a supplier during a tender or negotiation process, unless there are good business reasons to accept the gift.

## Giving gifts

We can give gifts if there is a legitimate business reason for it, or where the gift is a normal common courtesy. But we can't make a political donation without prior approval from the Board.

### Q: What kinds of gifts can I accept?

**A:** Examples of gifts which are likely to be acceptable are: an invitation to a business conference; an invitation to a sports or entertainment event in New Zealand; a gift or series of gifts of modest value. But if a supplier offered you tickets to a big game in the course of commercial discussions, for example, you should not accept them. Whether you can accept the gift or not will also depend on the context in which it was given.

## Koha

The prohibition against giving, receiving, offering or promising a bribe, facilitation payment or other benefit does not extend to koha. A "koha" is a gift, a token or a contribution given in money or in kind, in interactions with Māori individuals or organisations. For example, it is customary practice when visiting a marae to provide a koha (usually a sum of money) to ensure the tangata whenua (hosts) are not disadvantaged or inconvenienced in any way by hosting the visit. This is a traditional and culturally appropriate practice, seen as a token of appreciation to the hosts. We regard the giving of koha in these contexts as acceptable.



**Preferred contact**  
Legal Team

# Anti-bribery and corruption

We are committed to doing business with honesty, integrity and high ethical standards.

This means that we:

- have zero tolerance for bribery, corruption and facilitation payments across all areas and levels of our business
- prohibit giving, receiving, offering or promising a bribe, facilitation payment or other benefit – either directly or through third parties – to secure a business advantage
- comply with bribery and corruption laws globally, and ensure that our partners do the same
- ensure that our business activities are transparent and sufficiently documented
- carry out, document and communicate due diligence on our business partners where appropriate
- are alert to any “red flag” issues which need further investigation
- report any actual or suspected bribery or corruption through internal channels.



**Preferred contact**  
Legal Team

**Q:** What do bribery and corruption look like in practice?

**A:** Bribery and corruption can take a wide range of forms. **Bribery** could include giving or accepting cash payments, kickbacks (including on any portion of a contract payment), political contributions, charitable contributions, social benefits, travel, hospitality, rebates or reimbursements. In some circumstances, gifts can also constitute bribery: see **Gifts and hospitality** section above. Corruption is the misuse of someone’s power or position for private gain. **Facilitation payments** are typically small, unofficial payments made to secure or expedite a routine government action by an official. A **kickback** is payment to a person in a position of power for helping a supplier win the business.

**Q:** I helped a supplier with some work and they gave me a nice bottle of wine: can I keep it?

**A:** If this is a genuine “Thank you” and a kind gesture for great work, let your team leader know and if they okay it, you can keep it. But if you feel that accepting the gift will lead the supplier to expect preferential treatment, you should politely decline: that would make the gift a bribe.

**Q:** Can I make a political donation on Contact’s behalf?

**A:** You can’t donate to any political party, candidate, political cause or election fund **unless** the donation has been expressly approved by the Board.

**Q:** What about a charitable donation?

**A:** Charitable donations are usually acceptable. However, you can’t make a charitable donation in order to improperly secure some commercial or other advantage; distort a decision-making process; influence that person’s decision; or enter into a dishonest arrangement. If you make a charitable donation you need to **report it** to the Finance Team.

Don’t forget, you can report an actual or suspected breach on **ReportIt!**



# Our legal obligations



# Competing fairly

Contact believes in free and fair competition, and complies with all competition and consumer laws.

We conduct our business fairly and independently, and avoid engaging in anti-competitive, false, or misleading conduct, or dishonourable business practices. Our managers work to ensure that all Contact people comply with the relevant laws, and that those who need it receive the appropriate training. Anti-competitive practices can undermine the market, damage our business and reputation, and result in severe penalties (including steep fines and imprisonment).

This means that we:

- conduct all our business in a way that does not breach competition and consumer laws
- always follow Contact's processes when dealing with competitors and consumers
- think about how our interactions with competitors might be regarded by others
- collect information about competitors in legally appropriate and ethical ways

- never misrepresent facts about our business when engaging with customers, suppliers and competitors
- never discuss proposed bids with competitors
- ask the Legal Team if we're not sure.

**Q: Do the competition rules apply only to formal contracts with competitors?**

**A: No: they apply equally to informal agreements and the verbal sharing of information with competitors.**

**Q: What kind of statements could be misleading under consumer law?**

**A: Any claims made about the product being supplied have to be clear, accurate and unambiguous, so that consumers are fully informed. Examples of misleading behaviour include adding fine print about extra charges, advertising which makes untrue claims about a product or falsely claiming a product is cheaper than a competitor's.**



**Preferred contact**  
Legal Team



**For further information**  
see our **Competition and Consumer Law Policy**.

Don't forget, you can report an actual or suspected breach on **ReportIt!**





# Our privacy commitment

We aim to build a culture that puts respect for privacy at the heart of our behaviour. We hold a lot of customer and employee data – some of it sensitive – and we need to keep that information safe and secure.

A breach of privacy can result in serious harm for an individual or a group of people. It can also mean a loss of customer or employee trust, damage to our reputation and significant fines for the company.

This means that we:

- prioritise compliance with privacy laws and principles when handling and storing personal information
- only collect information from our customers and colleagues when we need it for specific business purposes
- make sure that the details we collect are accurate
- store the information securely and don't keep it for longer than necessary
- respect individuals' rights to view, edit or delete their information
- get permission before passing on email addresses or other personal details to a third person or outside organisation.



**Preferred contact**  
Legal Team



**For further information**  
see our **Confidentiality and Privacy Policy**.

**Q: What is personal information?**

**A:** Personal information is any information that is about any individual, or that lets you identify an individual – our employees, customers, and business partners. It can be a home address, ICP number, mobile number and so on – or a combination of pieces of information.

**Q: I'm designing a new project that will use personal information – can I just get those people to sign a privacy disclaimer?**

**A:** We need to think about privacy issues as an integral part of any new project. Talk to the Legal team for advice.

**Q: How do I destroy information safely?**

**A:** See our **Retention and Destruction Standard** on the SharePoint Policies page.



# Trading Contact shares

If you intend to buy or sell Contact shares (or other securities), or advise other people to buy or sell them, there are some important rules to be aware of.

These rules are designed to prevent “insider trading”, which is against the law in New Zealand. Insider trading refers to a situation where a person has information that is not publicly available – and that could affect the value of the shares – and acts on that information to advantage themselves or someone else. We ensure that we never breach insider trading laws and that we avoid any perception of Contact people dealing in shares when they should not do so.

This means that we:

- do not buy or sell Contact shares during our blackout periods
- do not trade (or advise or encourage others to trade) in Contact shares, even outside the blackout period, if we know information about Contact that is not in the public domain and could affect the share value
- always think and check before buying or selling Contact shares.



**Preferred contact**  
Legal Team



**For further information**  
see our **Securities Trading Policy**  
and **Market Disclosure Policy**.

**Q:** What is a blackout period?

**A:** The trading blackout is a designated period of time during which Contact people may not buy or sell Contact shares.

**Q:** How do I know when the blackout periods begin and end?

**A:** The blackout periods run from 1 January until Contact’s mid-February results are released, and from 1 July until the mid-August results are released each year. You will see messages on OneContact and on our SharePoint home page letting you know when the period will begin and end.

**Q:** What is “material information that is not in the public domain”?

**A:** Any information that has not been disclosed to the public, which if made available to the market, could have a material effect on our share price.

Don’t forget, you can report an actual or suspected breach on **ReportIt!**





# Our health, safety and wellbeing

# Health and safety

We care deeply about the health and safety of our people and strive to minimise any health and safety impacts on our customers and communities. We believe that safety is a core part of everyone's job and is a shared ethical responsibility.

This means that we:

- act professionally at all times, in accordance with laws and regulations
- collaboratively develop and improve safe and healthy ways of working with our suppliers, service providers, contractors, and business partners
- focus on learning and improving, in order to strengthen our resilience and capacity to fail safely
- work to generate an environment where it is psychologically safe to speak up
- contribute to ongoing improvements by speaking up when something doesn't feel right. Anyone and everyone can stop the job if they don't feel comfortable that hazards are being controlled effectively.



**Preferred contact**  
Health and Safety Team



**For further information**  
see our **Health and Safety Policy** and our **Resources page**.

- familiarise ourselves with the framework that provides safe ways of working at Contact. Understanding the framework is an important aspect of being able to create safe work outcomes.

**Q: I tripped and injured myself at work – how should I report this?**

**A: It's important that you report any health and safety-related observation or events using our Cintellate system or through our **Health and Safety** site.**

**Q: Who can I talk to about a health and safety issue?**

**A: Reach out to one of the Health and Safety team under **Who's who on the SharePoint Protect@Contact** page!**

**Q: I'm dealing with some personal challenges outside of work – where can I get some support?**

**A: Talking to your people leader or to someone in People Experience is always a good start. **Clearhead** (our Employee Assistance Programme or EAP) also has a range of Psychologists, Counsellors and Therapists who can provide confidential mental health and wellbeing support for you to stay well or overcome any challenges you are currently going through. It's free for all Contact Energy employees to use.**

# Wellbeing

We believe that physical and mental wellbeing is at the core of a healthy, balanced and positive workplace and that our people are more productive, healthier, and less stressed when their wellbeing is properly supported.

We aim to promote processes and positive workplace behaviours which improve our mental and physical health environment and culture, and to identify, eliminate, or minimise harmful processes and behaviours.

This means that we:

- encourage a culture of openness – providing avenues for our people to speak up about any concerns at any time and be heard
- partner with a range of external wellbeing professionals to provide a holistic view of wellbeing
- provide wellbeing training and education for both leaders and our people with pathways for mental, social, physical, and financial wellbeing
- offer flexible work practices and actively encouraging healthy work-life harmony.



**Preferred contact**  
People Experience



**For further information**  
see our **Wellbeing Policy** and our **Wellbeing Hub**.



# Sustainability and environment





# Sustainability and environment

Contact is committed to caring for the environment and protecting it for future generations. We believe that it is our responsibility to look after the natural resources that we use for the wellbeing of New Zealand and the sustainability of our business, minimising any negative impact on the environment while enhancing our positive contribution.

We work to integrate environmental considerations into all our business practices, making every decision and action count for the long run. We are guided by our Tikanga to make the best decisions for today and tomorrow.

This means that we:

- always comply with applicable environmental legislation and sustainability commitments
- make a sustained effort to lead decarbonisation by cutting greenhouse gas emissions from our own operations, and helping our customers to cut theirs
- promote the protection and enhancement of biodiversity and ecosystems
- wherever possible, apply waste management strategies and energy efficiency measures
- work with customers, suppliers and contractors to develop products and services to minimise the impact we have on the environment.

**Q: Where can I find more information about our approach to water and biodiversity?**

**A: We have a Water Commitment and a Biodiversity Statement** which explain our approach and commitments in these areas.

**Q: Do we make sure our suppliers are also meeting high environmental standards?**

**A: Yes, through our Supplier Code of Conduct**, which includes a section on Environmental Sustainability.

Don't forget, you can report an actual or suspected breach on **ReportIt!**



**Preferred contact**  
Sustainability Team



**For further information**  
see our **Environment Policy, Sustainability page, Water Commitment and Biodiversity Commitment.**



# Our communities

The nature of our business means our operations can sometimes impact on the environment and the people who live within it, so we work hard to be a good neighbour and a positive part of the communities we live and work in.

We strive to respect the rights of others, ensure the safe and best practice operation of our sites, and make a positive contribution

This means that we:

- respect local cultures and traditions and create collaborative, respectful partnerships with tangata whenua
- listen and respond to the concerns of local communities
- are open and honest in our interactions so that we gain the trust of our communities
- partner with national and local organisations to generate benefits for locals and their environment.

**Q:** How do we make sure different parts of the business are talking to local communities in a coordinated way?

**A:** Contact has a range of engagement plans for different stakeholder groups, and for specific projects. In some cases, we have dedicated lines of communication for particular stakeholders. There is a key relationship holder for each stakeholder category. If you need to talk to a particular stakeholder, please see our **Stakeholder Engagement Policy** for details.



**Preferred contact**  
Sustainability Team



**For further information**  
see our **Communities** page and our **Stakeholder Engagement Policy**.





# Protecting our assets





# Our information and assets

We are all expected to act in Contact's best interests, comply with the law and make sure our actions cause no harm to our reputation, customers or co-workers. This means using Contact resources honestly and efficiently.

Our resources include physical property (for example, equipment and supplies) and non-physical property (for example, our information and time).

This means that we:

- protect our brand and keep business information secure
- use technology for work-related purposes and reasonable personal use
- use Contact's resources for legitimate business purposes
- protect against phishing attacks by being alert and notifying AwhiTech of suspicious online activity
- manage risk by having good controls and guidance in place
- take responsibility for our decisions and actions, and when something goes wrong we report it immediately.

**Q:** What's an example of dishonest use of Contact's resources?

**A:** Examples include: taking home office supplies for personal use, using a company credit card to cover personal expenses, renting out or selling company hardware, reselling waste products for financial gain and selling company data.



**Preferred contact**  
ICT Team  
AwhiTech



**For further information**  
see our **Information Security Policy**,  
our **Information Management Policy** and  
our **Information and Social Media Guide**.



# Our communications and brand





## Social media use

Social media is an accepted and powerful business tool, but it can easily impact Contact's brand. Our personal social media activity can be associated with Contact because we work here, and our posts may have unintended consequences.

This means that we:

- only speak or post as a representative of Contact if authorised and trained to do so
- remember that we are representing Contact when posting anything in relation to Contact or our industry (in both private and public posts)
- don't disclose any confidential information on social media about our customers, suppliers, or people.

**Q: What happens if I post something on my private social media account, in my own time, which damages Contact's reputation?**

**A: This could be considered an employment-related matter and may lead to disciplinary action.**



**Preferred contact**  
Communications Team



**For further information**  
see our **Corporate Communications Policy** and our **How we talk style guide**.

## Speaking on behalf of Contact

We are all the face of Contact, and what we do and say in public reflects on the company. It is important that our external communications are clear, consistent and legally compliant.

It is also important that they align with our Tikanga. To limit any risk to Contact we have specific rules in place to ensure that any information we release is accurate and appropriate. This means only a few people are authorised to speak to the media, and that some other interactions need to be approved. These rules are in place to reduce risk and protect both you and the business.

This means that we:

- never speak to the media without authorisation from our Communications team, and let the relevant people know about interactions with the government or regulators
- seek approval for any business presentation containing non-public financial or performance-related information
- communicate openly and appropriately with external audiences while protecting the privacy and personal data of our people and customers
- ensure our communications are approved for external release, where required
- ensure our communications are in plain English and clear as to their purpose.

**Q: What are 'external communications'?**

**A: External communications include – but aren't limited to – any exchanges with the media (including through social media), government agencies, Members of Parliament, regulators, community groups, suppliers and other businesses.**

**Q: What happens if a radio station calls me for a quick comment on a major market development?**

**A: Immediately refer the caller to the Head of Communications and Reputation or the Senior Advisor External Communications, and don't offer your own views. You should also refer the enquiry to the **Media inbox**.**



**Preferred contact**  
Communications Team



**For further information**  
see our **Corporate Communications Policy**.



# Our brand

Just as it takes a village to raise a child, it takes an entire organisation to build a successful brand. We know that for others to believe in us, we have to believe in ourselves.

Our brand is owned by each and every one of us, it's everything we say, show and do – a collective effort right across the organisation. You can help by following our Brand Guidelines to help us be consistent and distinctive.

This means that we:

- familiarise ourselves with what Contact stands for and champion it everywhere we can
- comply with our Brand Guidelines
- recognise that meaningful workplace behaviours will positively affect the way our brand is perceived both inside and outside the business
- report any suspected misuse of our brand or other Contact intellectual property.

**Q:** What should I do if a supplier asks to use the Contact brand on its website?

**A:** Before giving permission, please talk to the Brand and Marketing team (part of Retail) or to the Legal Team.



**Preferred contact**

Brand and Marketing Team, Legal Team



**For further information**

see our **Brand website** and **Brand Guidelines**.



# Speaking up



## Speaking up

We want everyone at Contact to feel they can speak up about any unacceptable behaviour at work. If you become aware of or suspect any serious wrongdoing, we strongly encourage you to report it.

This includes behaviour which breaches our policies (for example, bullying or harassment, a conflict of interest, danger to the health and safety of employees or the public, potential abuses of human rights or serious environmental issues) or which appears to be illegal or unethical (for example, bribery, fraud, price fixing or a breach of data privacy).

**Q:** I want to report a concern, but don't want my colleagues to find out. Will my report be kept confidential?

**A:** We will protect the identify of anyone who reports a concern and we will not tolerate retaliation against them. We'll keep the information provided private during the investigation (subject to our legal obligations). You can also make a report anonymously, but this may limit our ability to investigate and resolve the issue.

**Q:** What if I need some wellbeing support to help me through the process?

**A:** Clearhead (our Employee Assistance Programme) makes it easy for you to confidentially get the mental health and wellbeing support you need to stay well or overcome any challenges you are currently going through. Their therapy sessions are entirely confidential and free, and are available 24x7.

## How do I speak up?

At Contact we prioritise the welfare of our people, customers and suppliers, and put 'doing the right thing' front and centre.

If you see or experience any behaviour, activity, or information that breaches our Code of Conduct, policies or legal obligations, or that you are not comfortable with, there are three key ways to speak up:

- **Talk to your people leader:** although it's not always easy to raise your concerns, we encourage you to discuss any issues, or potential issues, directly with your people leader.
- **If you're not comfortable raising it with your people leader, or it's not appropriate to do so,** you can talk to another people leader or someone in the People Experience team.
- **Alternatively, you can make a report – either anonymously or non-anonymously – from the SharePoint ReportIt! page.** You can also make a privacy breach report from the ReportIt! page. All reports will be treated confidentially (unless you say otherwise). Please note that if you decide not to identify yourself, we won't be able to keep you updated or let you know how the issue is resolved.



### Preferred contact

Legal Team, People Experience Team



### For further information

see our **Whistleblowing Policy**.





