



# Code of Conduct



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Document reference: PE\_POL\_01 V2  
Policy Owner/s: Vanessa Hicks and Trent Czinner  
Version Effective Date: 19 August 2023  
Approved by: Board



We acknowledge the Traditional Custodians of Country throughout Australia and the lands on which we, and our communities, live, work and connect.

We pay our respects to their Elders, past, present and emerging.



**Listening to Land - Connecting to Country**

by Riki Salam (Mualgal, Kaurareg, Kuku Yalanji),  
We are 27 Creative.



## 02. Message from our CEO and Managing Director

**At TPG Telecom, we have an ambition to become Australia's best telco – for our customers, for our people, the community and our shareholders.**

It requires deep understanding, a desire to improve everyday, and courage to think differently.

It also relies on the honesty and integrity of our people, behaving ethically and in accordance with laws and regulations. In short, it relies on us doing what's right.

Our Code of Conduct outlines the way we all need to work, and do what's right. It strengthens our ability to deliver on our ambition and protects our company and reputation. It's a responsibility we all share equally.

We value your voice and encourage you to speak up if things don't feel right. Our Code of Conduct outlines the processes to raise concerns in a safe and supportive way, with the aim of addressing issues and improving how we work.

Please read the Code of Conduct thoroughly and become familiar with the other policies listed in this document. If you have any questions please speak to your leader.

Thank you for your commitment to TPG Telecom.

**Iñaki Berroeta**

A handwritten signature in black ink that reads "Iñaki Berroeta".





# 03. TPG's Purpose and Values

## Purpose

TPG Telecom Limited started with a belief that we can make things better for Australians. We can deliver better outcomes for consumers and businesses by driving more competition, investment and innovation and delivering more choice and value.

That's why we've decided to put a stake in the ground. To stand for something that matters to us and we're in a position to influence.

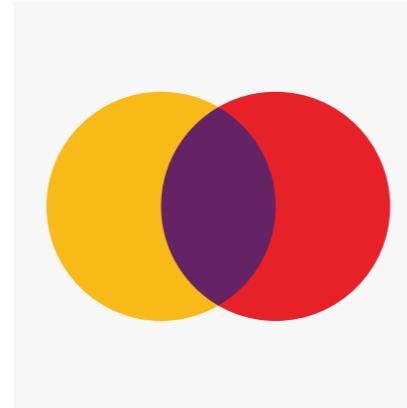
For us, that's a belief in the power of meaningful relationships to support vibrant, connected communities where everyone belongs. It is our why; our reason to exist.

We're in business to build those meaningful and respectful relationships. To find common ground and to celebrate the things that make us different as well as the things that bring us together.

## Our Values (the TPG Spirit)

Our purpose comes to life through living our values. We have four values that guide how we think, behave, prioritise, and create experiences for our customers and communities every day.

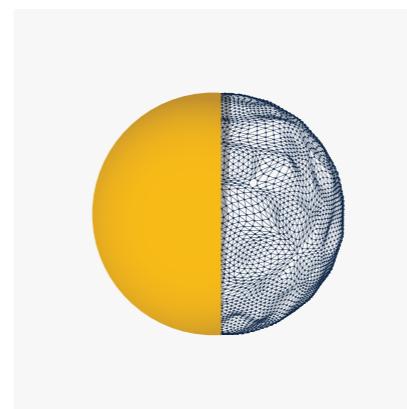
Each of our values has a story and together they underpin the TPG Spirit. We all play a role in bringing the TPG Spirit to life.



## Stand together

**Together we are unstoppable.**

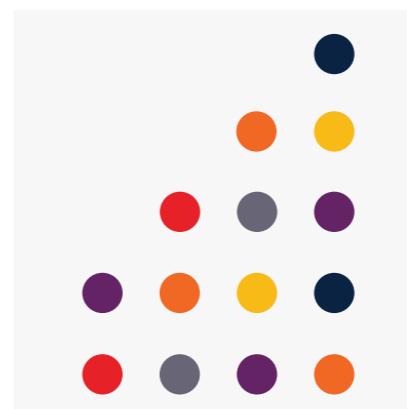
- We're inclusive and open-minded.
- We connect with empathy.
- We make it happen together.



## Simple's better

**We step up and own what we do.**

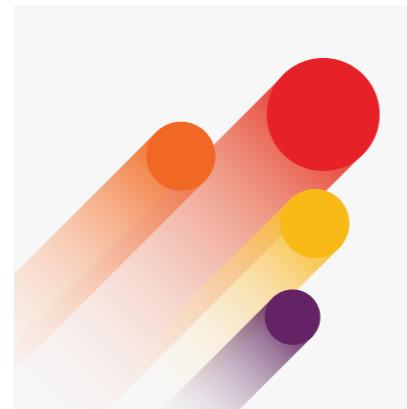
- We believe change starts with us.
- We get it done with pride and care.
- We can be counted on and trusted.



## Own it

**We challenge ourselves to find a better way.**

- We embrace simple.
- We make the complicated easy.
- We create time for what matters.



## Boldly go

**We are hungry, curious and brave.**

- We think big & ask ourselves 'what if?'
- We win or we learn.
- We make a difference.



# 04. Our Code of Conduct

## Who is it for?

Our Code of Conduct (our **Code**) applies to all people who work at TPG Telecom, including our employees, contractors, directors and officers. When we say "you" or "our people" we are referring to this group. When we say TPG Telecom, this includes all the companies that make up the corporate group of TPG Telecom Limited. Non controlled entities, if any, are encouraged to adopt similar principles and standards.

## What does it mean for me?

Our Code is our foundational policy document outlining the standards of behaviour required of all our people. You are expected to read and understand this document, and to ensure your behaviours and actions are in line with the Code and the TPG Spirit.

We'll help by providing you with regular training and refreshers. This Code is designed to be broad enough to help guide your decision-making in most circumstances.

## Why do we need it?

How we go about our business and the behaviours we encourage and accept are equally as important as the results we deliver. The standards outlined in our Code are crucial to ensuring all of our interactions leave others feeling safe, respected and heard. When we don't meet these standards, it is our expectation that our people own and learn from their mistakes. Serious breaches may result in disciplinary action, termination of employment or the cessation of contracting arrangements.



**If you are ever unsure of the right course of action, ask yourself:**

- Does your decision feel right to you?
- Should we do this? Is it ethical?
- How would it impact our customers, community, shareholders or colleagues?
- Could you justify your choices to your friends, family or the media?
- Is it legal?
- Is it in line with our policies?
- Does it uphold the TPG spirit?

If you can't positively answer these questions, then your behaviour may not be aligned with our Code or TPG Spirit and you should seek further support and guidance from your leader.

# 05. Speak Up! Our Open Door Approach

## Speak Up

Maintaining a positive work environment takes commitment and courage from all of us. We all contribute by taking responsibility for our behaviour, speaking up, and taking an active role in helping others when we see or hear things that don't feel right.

### There are many options available to you to speak up.

- You can talk to your leader/s
- You can raise your concerns with People Experience at [askpe@tpgtelecom.com.au](mailto:askpe@tpgtelecom.com.au) or speaking with your PE Business partner.
- You can raise your concerns directly to our Compliance team: [compliance@tpgtelecom.com.au](mailto:compliance@tpgtelecom.com.au). This includes any matters which relate to our compliance with the Code, internal policies, laws and regulations including the *Competition and Consumer Act 2010*.

Learn more about our internal grievance handling process [here](#).



## Report it

If you don't feel the options available to you to speak up are appropriate for your situation, you can report it using the Whistleblower process including through our external Whistleblower hotline (Fair Call). Our Whistleblower hotline is a confidential and secure independent service, where you can anonymously (if you choose) report a complaint, issue or concern relating to illegal, unethical or improper conduct.

You can report a concern through the **Whistleblower hotline** by:

- Calling 1800 500 965
- Via a secure online facility at [kpmgfaircall.kpmg.com.au/TPGTelecom](http://kpmgfaircall.kpmg.com.au/TPGTelecom)
- By post to:  
The FairCall Manager,  
KPMG Forensic, PO Box H67,  
Australia Square, Sydney NSW 1213

## Whistleblower Policy

For more detail on reporting, including who can make a Whistleblower report and how investigations will be treated see our **Whistleblower Policy**.

We recognise that choosing to raise concerns can be confronting and challenging, however it is important to us that improper behaviour and behaviour not aligned with our Code is acknowledged and addressed. All our people should feel safe to raise their concerns, and we will not tolerate retribution against any person who reports issues in good faith.

Our **Employee Assistance Program (EAP)** is also available to provide confidential counselling or support to any employee who may be raising an issue through any of our channels.

# 06. For Our Customers & Shareholders

When making decisions that could affect our customers and shareholders we always act with integrity, honesty and fairness.

We take compliance with all applicable laws and regulations seriously and educate our people on laws, regulations and policies applicable in their roles.

We expect third parties acting on our behalf to do the same, while also adhering to our Supplier Code of Conduct.

## Acting with Integrity, Honesty and Fairness

- We take a zero tolerance approach to fraud, bribery and corruption.
- We act in the best interests of TPG Telecom and our shareholders, by ensuring our personal interests and relationships do not influence our decision making when we are at work.
- We disclose to People Experience any actual, potential or perceived conflicts of interests that may compromise or influence our responsibilities, relationships or activities that could potentially conflict with our responsibilities and take reasonable proactive steps to ensure such conflicts are appropriately managed. This includes ensuring we do not directly compete with TPG Telecom.
- We never use our position and knowledge of TPG Telecom operations for personal gain, including trading in TPG Telecom shares with inside information, and always comply with the **Securities Trading Policy**. If we do become aware of any information that could potentially affect the price of TPG shares or influence investor decisions, we report this to the Company Secretary.
- We are committed to upholding the integrity of the market for our securities by providing all investors with equal and timely access to price sensitive information that we are required to disclose to the market, by disclosing it to the ASX first.
- We don't offer donations or gifts to government officials or make political donations. If we are ever unsure on who may be deemed a government official, we take the necessary steps to find out and seek advice
- We don't give or accept improper gifts or hospitality. We always take extra care when we may offer, or are offered, gifts and hospitality to ensure it is modest in amount, recorded on our register, and is never used to sway a business outcome.



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## Compliance with all applicable Laws and Regulations

- We comply with applicable laws and regulations which apply to our business.
- We are committed to and take seriously our obligations under the Australian Competition and Consumer Act.
- We compete fairly and would not enter into arrangements or agreements with competitors or potential competitors about how we conduct ourselves in any dealings with customers or other competitors.
- We would never attempt to have an unfair advantage over competitors, suppliers or customers by taking advantage of confidential information, providing misleading information or falsifying the facts.
- We don't share competitively sensitive information with our competitors.
- We ensure our business transactions and exports comply with economic sanctions and trade control laws.
- We actively identify and manage our risks in order to responsibly achieve our business purpose and objectives.



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## Confidentiality & Communication

- We are honest about what we can deliver and strive to match our products and services to our customer needs.
- We take proactive steps to ensure our customers have a positive experience.
- We believe we have a duty to protect TPG Telecom's and our customer's confidential information. We understand that we hold these obligations even when we're in social settings, during and after the time our work with TPG Telecom may end.
- We only use confidential information entrusted to us by others when authorised and for the purpose for which it has been provided.
- When we speak publicly about TPG Telecom, we ensure we are first authorised to release any information externally by discussing it with our leader and External Affairs team.
- If we see any information about TPG Telecom that may be incorrect or misleading, we let the External Affairs team know.



# 07. For our People and Community

At TPG Telecom we believe in embracing different backgrounds, experiences and ideas to create an environment where we all feel we belong and can be ourselves at work.

We work together to create a safe and respectful workplace and don't tolerate any form of harassment, bullying or discrimination from anyone.

We are conscious about limiting our impact on the environment and we are committed to respecting internationally recognised human rights.



## Respect for Others

- We do not tolerate any form of discrimination, victimisation, harassment or bullying in our workplace and pursue equality of opportunity in all aspects and stages of employment and pre-employment. We are committed to and focused on our positive obligations to reasonably prevent such behavior occurring and we take action to address these behaviors if they ever do occur.
- We strive to create an active bystander culture and speak up if we have any concern relating to equal opportunity, discrimination, harassment, victimisation and bullying in the workplace.
- We encourage and promote diversity and are all responsible for supporting an inclusive workplace culture based on respect for our colleagues.
- We live by our values, they set the benchmark for how we think, act and create experiences for our people, customers and community.



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## A Safe and Inclusive Workplace

- We are committed to ensuring a safe environment and support the health, safety and wellbeing of all our people, customers and communities.
- We take seriously our obligations under our health and safety standards and policies and expect all our people to understand and comply with these.
- We report all accidents, and unsafe practices and situations immediately and intervene quickly if we see someone behaving unsafely for themselves or others.



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## Care for our Environment and Human Rights

- We are committed to respecting human rights consistent with the Universal Declaration of Human Rights and International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at work.
- We stand fully behind local and international efforts to stop modern slavery and human trafficking. We aim to ensure all forms of modern slavery are not occurring anywhere in our business or amongst our partners and suppliers.
- We sometimes provide donations and sponsorships on behalf of TPG Telecom for causes we are passionate about within our community. These are overseen by the TPG Telecom Foundation or by our Compliance teams to ensure they are for legitimate purposes and due diligence is applied.
- We are committed to reducing our impact on the environment by managing our operations in an environmentally responsible manner and promoting a culture of responsible environmental management.

# 08. Where you can find more information

[Anti Bribery & Corruption Policy](#)

[Supplier Code of Conduct](#)

[Information Security Policy](#)

[Securities Trading Policy](#)

[Communications & Social Media Policy](#)

[Competition Law Policy](#)

[Privacy Policy](#)

[Whistleblower Policy](#)

[Diversity and Inclusion Policy](#)

[Human Rights Policy](#)

[Environmental Policy](#)

[Health, Safety and Wellbeing Policy](#)

[Respect at Work Policy](#)

