

Australia Post's statement on our ethics

At Australia Post we conduct our business with integrity, in compliance with all relevant laws, regulations, codes, corporate policies and procedures

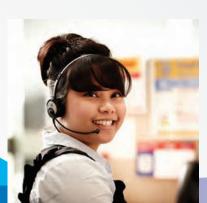
Importantly, we behave in accordance with our culture pillars: Safety, Accountability, Customer Focus and Speed of Action.

Everything we do can have social, environmental and economic impacts. In fact, our long-term commercial success – our own sustainability – depends on what we do and how we do it.

This book is important for employees and everyone who represents Australia Post. It outlines the culture pillars and ethical standards that we are all responsible for.

We must lead by example in our dealings with customers, suppliers, the corporation and each other.

And our managers and supervisors have a special responsibility to foster a culture in which ethical conduct is valued, recognised, demonstrated and expected.



Why do we need this book?

Our ethics statement is a public declaration about the standards of behaviour we expect.

This book will help you act according to those ethical standards and our culture pillars.



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Australia Post's culture pillars

Our culture pillars are core beliefs; they guide how we behave.

By demonstrating the culture pillars every day, we help ourselves and Australia Post succeed. We always put safety first, take accountability for our actions, remain focused on our customers and seek to deliver timely outcomes.

What's the difference between culture pillars and ethical standards?

The ethical standards tell us the minimum expected standards of behaviour and guide us through ethical dilemmas. The culture pillars create a common understanding of the behaviours we need to demonstrate to achieve our vision and strategy.



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Ethical standards policy

It is the Australia Post policy to:

- inform everyone who works for or represents Australia Post of our ethical standards
- promote, value, recognise, demonstrate and expect ethical and lawful behaviour
- address behaviour that is inconsistent with the ethical standards by promptly and consistently applying:
 - i. the appropriate component of the Employee Counselling and Discipline Process to award-based employees
 - ii. the relevant contractual provisions to contract employees (i.e. executives and managers) and others (i.e. anyone else who works for or represents Australia Post including directors and contractors)
- address inaction or omissions by managers and supervisors who allow unethical behaviour to go unresolved
- dismiss or discontinue the services of an individual, where warranted by the seriousness and circumstances of the ethical breach
- refer suspected or alleged criminal behaviour to Australia Post's Corporate Security Group (CSG)

Use this book as an action plan

Our ethics helps us apply Australia Post's expected standards of behaviour. Our performance, work environment, reputation and business success depend on these standards. Non-compliance must be resolved promptly.

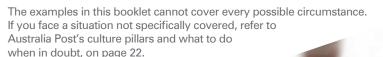
Australia Post's ethical standards

The ethical standards describe the behaviour expected of everyone while employed by, or engaged with, Australia Post, both in Australia and overseas.

Most of our ethical standards include supporting policies and procedures.

Your manager or supervisor will tell you about the policies and procedures that apply to your work.

If you need to clarify any of these ethical standards or supporting policies and procedures, please ask your manager or supervisor.





1. Health, safety and work environment

Australia Post believes everyone deserves to go home at the end of their work day as healthy as when they arrived.

Our safety program, I Am for Zero, reflects our vision for zero injuries, zero harm and zero tolerance of unsafe acts or work practices. Safety is everyone's responsibility. To ensure safe working practices, staff receive support from our Occupational Health and Safety management systems, policies, procedures and training.

Unsafe behaviour can cause injury and loss; Australia Post will not tolerate it.

1.1 It is your responsibility to:

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

1.2 Unacceptable behaviour includes but is not limited to:

- a) any activity or work that might be hazardous to yourself or others
- b) smoking in Australia Post retail outlets, offices, buildings and vehicles
- c) consuming alcohol while on duty or in the workplace (except at authorised social activities)
- d) consuming or possessing illegal drugs on Australia Post premises, in our vehicles, at corporate functions and when doing Australia Post business
- incorrect usage of mobile phones and other devices whilst operating motor vehicles or company machinery / equipment.

2. Compliance with laws and regulations

Australia Post complies with all relevant laws, regulations and codes; we also inform all employees about their obligations to comply with such laws, regulations and codes.

2.1 It is your responsibility to:

- a) comply with the laws, regulations and codes relevant to your work
- abide by any host country's legal requirements when working or doing business for Australia Post overseas; if inconsistencies arise with Australian legal requirements, the more stringent requirements will apply.

2.2 Unacceptable behaviour includes but is not limited to:

- a) mail theft, tampering with mail or obstructing mail delivery
- b) paying or accepting bribes
- c) theft of property or cash
- d) acting contrary to any standards prescribed by any Australian law or regulation.



Respect is the cornerstone of a safe working environment.

3. Work practices and performance

At Australia Post, we demonstrate high standards of professional behaviour to create a positive work environment that delivers outstanding service to our customers.

3.1 General requirements

3.1.1 It is your responsibility to:

- a) comply with all our policies and procedures, and all laws, industrial awards and agreements that apply to your job
- b) ensure that anything you state about yourself or your colleagues is true and correct
- c) attend work reliably and on time, consistent with hours of duty arrangements
- d) use correct procedures to advise if you can't attend work or if you will be absent during duty
- e) consistently perform work to your expected standard or higher
- f) exercise due care in your work
- a) follow all reasonable and lawful directions from authorised persons
- h) present yourself professionally and wear corporate clothing when required.

3.1.2 Unacceptable behaviour includes but is not limited to:

- a) intentionally damaging our interests, employee relations or public reputation
- b) reckless acts or omissions that cause, or could cause, damage or harm, or adversely affect the employment relationship
- c) intimidating, offending or misleading customers, colleagues, suppliers or the public
- d) damaging our property or the property of other staff members, customers, suppliers or the public
- e) gambling or betting at work (except for authorised sweeps and tipping competitions)
- f) claiming unjustified hours of duty.

Each one of us is responsible for performing our duties in accordance with Australia Post's culture pillars, ethical standards and supporting policies and procedures.



3.2 Customer service

We value our customers and are passionate about delivering outstanding experiences.

3.2.1 It is your responsibility to:

- a) provide a consistently high-standard service that ensures our customers feel valued
- b) always work to improve our service
- c) remove obstacles to outstanding service and escalate if necessary
- d) be customer sensitive but commercial when developing products and services for customers
- e) remain up-to-date with the products, services and processes relevant to your duties
- f) keep customer, supplier, employee and business information private.

3.2.2 Unacceptable behaviour includes but is not limited to:

- a) deliberately misleading customers with inaccurate or out-of-date information
- b) not taking responsibility for a customer's problem and not seeing it through to resolution
- rudeness, impatience or any other behaviour that implies lack of care for customers
- d) ignoring a customer service issue and failing to escalate when appropriate.

We are all responsible for our public comments. When using social media, we must consider the consequences of our actions, for ourselves and for Australia Post's interests and reputation.



3.3 Workplace relationships

Australia Post promotes a harmonious workplace where everyone is treated fairly and respectfully; a workplace where every contribution is valued. We are committed to equal employment opportunity and merit-based selection and promotion.

3.3.1 It is your responsibility to:

- a) treat all employees, customers, contractors and suppliers with courtesy and respect at all times
- b) contribute to a workplace that values and encourages different constructive opinions, perspectives and cultures
- be adaptable and maintain a positive approach to change; support new ideas, programs and practices that benefit the business and its stakeholders.

3.3.2 Unacceptable behaviour includes but is not limited to:

- a) causing disadvantage, discomfort, embarrassment or offence to others in the workplace, during out of hours activities or when using social media
- discriminating, harassing or bullying anyone at work, during out of hours activities or when using social media
- c) starting or spreading rumours that may damage another person's reputation, including when using social media
- d) threatening, abusing or intimidating (physically, verbally or in writing), or injuring or attempting to injure, another person, whether at work, during out of hours activities or when using social media
- e) gambling or betting at work (except for authorised sweeps and tipping competitions)
- f) engaging in unauthorised transactions in the workplace between employees where interest, money or kind is charged or paid.

Out of hours activities

includes social activities with other employees, work-related activities that take place outside standard work hours, contributing to social media forums or any activity that has a sufficient connection with your employment. **Social media includes** forums, blogs, sites like YouTube, Facebook and Twitter, and other sharing platforms.

3.4 Fair competition

The Competition and Consumer Act sets out the principles of fair competition. Australia Post engages in fair competition; we educate staff about the key principles of the Act through our Competition and Consumer Compliance program.

3.4.1 It is your responsibility to:

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

3.4.2 Unacceptable behaviour includes but is not limited to:

- a) discussing prices, discounts, allowances, rebates or credits with competitors
- b) discussing "excluding" or "limiting" dealings with a particular supplier or customer

 making it a condition of supply that a customer must acquire products or services from another person

 d) attempting to set the price at which a customer re-sells Australia Post products.



4. Conflicts of interest

Decision making at Australia Post is impartial, objective and free from competing self-interest, prejudice and favouritism.

4.1 General requirements

4.1.1 It is your responsibility to:

- a) avoid situations or actions that create, or may be perceived to create, a conflict of interest, or situations that may interfere with the exercise of sound judgement
- b) avoid decisions and decision-making processes that may generate personal gain for you, an immediate family member or a close personal friend
- c) inform your manager or supervisor where a conflict of interest exists or may be inferred.

Examples of conflict situations include:

- 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 are associated with a third party who has an interest in a decision or decision-making process that involves you
- iii. your involvement in the recruitment or selection of an immediate family member.

4.1.2 Employment or engagement of immediate family

is permitted, but not where a family member is a line supervisor or can directly influence career path, conditions of employment or engagement, or performance assessment.



Gifts and benefits are anything of value, including direct payment, like money, and payments in kind, such as discounts, loans, goods and services, and favourable terms on any product or service, shares or other securities and vouchers.

Hospitality includes meals, travel, accommodation and entertainment.

4.2 External gifts, entertainment, benefits and hospitality

Australia Post is committed to conducting its business with honesty and integrity.

4.2.1 It is your responsibility to:

- a) be extremely careful when giving or accepting gifts, entertainment, benefits and hospitality from existing or potential suppliers, external customers or competitors
- b) never offer, give, seek, accept or appear to expect a gift, entertainment, benefit or hospitality that could be reasonably regarded as:
 - i. influencing your ability to make objective decisions
 - ii. unduly influencing the recipient or creating a business obligation on the part of the recipient
 - iii. creating a conflict of interest
 - iv. damaging to relationships, or indicating favouritism or prejudice towards a particular person or group of people.
- c) before giving or accepting a gift or benefit, ensure the gift or benefit:
 - i. is acceptable under policy
 - ii. is token, seasonal or for a special occasion and of moderate value
 - iii. cannot be reasonably construed as an improper inducement
- d) talk to your manager or supervisor if you are unsure if a gift or benefit is acceptable
- e) register gifts, entertainment, benefits and hospitality as per relevant policy.

4.2.2 Unacceptable behaviour includes but is not limited to:

- a) seeking or unauthorised giving of gifts, entertainment, benefits or hospitality
- accepting gifts of money, except for seasonal or special-occasion gifts of moderate value that cannot be reasonably construed as an improper inducement
- accepting repetitive gifts, no matter how small; they may be perceived as an attempt to create an obligation to the giver.

If unsure, refer to page 22, What to do when in doubt.

Any outside employment

and / or associated activities must never conflict with your role at Australia Post or bring Australia Post into disrepute.



4.3 Suppliers

Australia Post promotes fair and honest relationships with suppliers; we quickly resolve any business issues that arise.

4.3.1 It is your responsibility to:

- a) comply with our procurement and tendering policies and procedures
- avoid any relationship, financial or otherwise, with potential or existing suppliers that might unfairly influence your judgement, or create the perception of unfair influence
- c) act lawfully and fairly with all suppliers
- d) avoid potential conflict of interest in any supply decisions.

4.4 Outside employment and associated activities

4.4.1 It is your responsibility to:

- a) only engage in outside employment or associated activities if such activity would not:
 - i. negatively affect your work attendance at Australia Post
 - adversely affect your work performance with Australia Post (including where you might be injured, or aggravate an existing injury or condition, therefore affecting your performance or resulting in sick leave or medical retirement)
 - iii. be a conflict of interest with your nominal duties or with the commercial objectives of Australia Post
 - iv. lead to disclosure of unauthorised Australia Post information
 - v. create the misleading perception that you represent Australia Post.
- 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 no conflict, or appearance of conflict, will occur between your Australia Post and directorship duties
 - at the request or consent of Australia Post, according to any conditions specified by Australia Post

- iii. in accordance with the requirements of your official Australia Post duties.
- c) seek your manager's written approval if you have any doubts about your proposed outside employment and / or activities.

4.4.2 Unacceptable behaviour includes but is not limited to:

 using Australia Post property, information, money, facilities, time or the services of Australia Post staff for your outside employment and / or associated activities.

4.5 Bribery and corruption

Australia's strong laws criminalise corrupt behaviour across a range of activities, including bribery, embezzlement and extortion. Any person or company who bribes a foreign public official when in Australia can be prosecuted. Similarly, 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. Australia Post's reputation can also suffer significant damage.

4.5.1 Unacceptable behaviour includes but is not limited to:

- a) bribing an individual, including a foreign public official or company representative, within or outside Australia
- engaging in any conduct that might contribute to embezzlement, corruption or extortion.

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





5. Environmental sustainability

Australia Post works hard to protect the environment for current and future generations.

5.1 It is your responsibility to:

- a) comply with environmental laws and regulations, and Australia Post's environment policy
- consider environmental impacts when making investment decisions, developing plans and strategies, and purchasing goods and services
- c) responsibly use resources and manage waste, including:
 - only using materials, such as water, paper and rubber bands, where necessary
 - ii. re-using and recycling resources where possible.
- d) support our efforts to reduce our greenhouse gas emissions, particularly:
 - minimising energy use by turning off lights, equipment and other resources when not in use.

We support the health of the planet by minimising our environmental footprint for our own and future generations.

6. Use of corporate property

Australia Post gives all employees the tools and resources they need to work safely, efficiently and effectively.

6.1 Assets and resources

6.1.1 It is your responsibility to:

- a) safeguard, and correctly and efficiently use corporate property
- b) only use our assets and resources for Australia Post business, unless authorised by your manager

If personal use is authorised, you must:

- i. observe 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, providing all consumables, unless otherwise authorised.
- c) comply with laws, regulations and our current policies that relate to using our property
- d) return all Australia Post property if you're no longer working with us.

6.1.2 Unacceptable behaviour includes but is not limited to:

- a) using our property for personal gain or for the benefit of people outside Australia Post, or deliberately helping others do the same
- b) using corporate information resources, such as the internet or email, outside policy restrictions
- publishing images of our property online, including on social media, without approval from Legal Services or your manager
- d) not maintaining or operating company property (including company cars) and equipment in a safe and responsible manner
- e) using a corporate credit card for personal transactions.



Assets include computer systems, software and plant (for example, motor vehicles, machinery, furniture and tools).

Resources include Australia Post staff, corporate credit cards and consumables (for example, fuel, paper and printer cartridges).

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Intellectual property is a form of property and includes trademarks, copyright, patents and confidential information.



6.2 Intellectual property

We safeguard our intellectual property and respect that of others. This is crucial to our business and identity in the marketplace.

6.2.1 All intellectual property you create during your work with Australia Post remains our property unless we tell you otherwise.

6.2.2 It is your responsibility to:

- a) comply with Australia Post's Intellectual Property policy
- b) protect our intellectual property by identifying it wherever possible and acting to secure our rights to it
- obtain written consent before using someone else's intellectual property, for example:
 - using a photograph taken by someone external to Australia Post when creating a catalogue or designing a stamp
 - ii. downloading information from the internet or copying part of a book, then distributing it to others at work
 - iii. preparing any advertising material that uses text written by someone external to Australia Post

d) talk to your manager or supervisor, or contact Legal Services for advice, if you have any doubt about your proposed dealings with 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, photographs, packaging, designs, inventions and corporate information.

7. Corporate records

Australia Post meets all commercial, legal, management and archival obligations for our financial, business and employee records.

7.1 It is your responsibility to:

- a) ensure that all records, declarations or statements you prepare are factual, accurate, complete, honest, objective and timely
- b) only authorise records that are accurate and complete
- c) only disclose records as authorised, or in response to due legal process
- d) ensure that all information, especially sensitive or personal information, including customer payment card information, is secured so it is not subject to inappropriate or unauthorised use or disclosure
- e) only access commercially sensitive or personal information if you have a legitimate business need
- f) return Australia Post records to us before ceasing your employment or engagement with the corporation.

7.2 Unacceptable behaviour includes but is not limited to:

a) deliberately making a false, misleading or unsupported record

STORY

b) deliberately suppressing relevant information in a record.

Records are documents created or received while working for Australia Post. They can be in electronic or paper form, including emails, letters, briefs, memos, minutes, lists, documents, hard drives and back-up tapes. They do not include Post Journals, newsletters and other widely distributed information.

Complete and accurate records must be kept in order for us to meet our obligations.

POST

8. Confidentiality

Australia Post protects all personal and confidential information and ensures that all employees understand their privacy obligations.

8.1 Business, customer, supplier and personnel information

8.1.1 It is your responsibility to:

- a) comply with our Privacy and Employee Privacy policies when accessing personal information; personal information is any information, whether true or not, about an individual who can be identified by that same information
- arrange for business partners to sign a confidentiality agreement before disclosing any confidential information (Legal Services can provide agreements)
- only use business, customer, supplier and personnel information for authorised purposes, and protect it from theft, unauthorised disclosure or inappropriate use
- d) treat as confidential, and use only for official duties, any information about Australia Post, our customers and our suppliers that might provide a competitive or financial advantage or might relate to a customer's business; the only exception is where the information is publicly available through, for example, our website, press releases or annual report
- e) only disclose information from our personnel records to another person or entity (other than the individual concerned) if the disclosure complies with our policies
- f) safeguard confidential information after ending your work with Australia Post
- g) talk to your manager or supervisor, or contact Legal Services for advice, when unsure about your rights and responsibilities under privacy laws.



8.2 Public comments

8.2.1 It is your responsibility to:

- a) tell your manager about any media requests or proposals to release corporate information; any public comment must be authorised by External Affairs and Reputation (public comment includes speaking engagements, interviews, and views expressed in any form of public communication, electronic or otherwise)
- b) use social media responsibly to ensure you do not accidentally or deliberately:
 - i. release confidential Australia Post information
 - ii. breach copyright, privacy or defamation obligations
 - iii. make comments, post pictures or do anything that could harm our brand, reputation or commercial interests.



Protecting the privacy of the personal and confidential information entrusted to us promotes trust and loyalty, which are critical to our reputation.



What to do when in doubt

Before you act

When considering a course of action, ask yourself the following questions:

- Would it be consistent with our culture pillars and ethical standards?
- Would it be consistent with our health and safety standards?

If you answered "no" to either question, you should not proceed. If necessary, discuss with your manager or Human Resources adviser.



If you have taken the wrong action

If you believe or know you have acted inconsistently with our ethical standards, you should tell your manager right away.

When you need help

Personal problems, whether work related or not, can affect your work performance, health and safety; these problems might also make it more difficult to meet our ethical standards. All of us, from time to time, may experience such problems. Hoping the problem will go away does not always resolve it.

We offer confidential assistance and support for all employees and immediate family members through our Employee Assistance Program (EAP). This program helps with work and personal issues.

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You can get more information about the EAP at all Australia Post workplaces.

Our Employee Assistance Program (EAP) can help you with work or personal problems.

Concerned about someone else's behaviour

You may encounter what you think is unethical behaviour. The action you take should depend on the nature and seriousness of the behaviour.

Improper behaviour

Examples of improper behaviour may include:

- Discrimination gender, race, religion, age
- · Harassment sexual, bullying, stalking
- Discourtesy disrespect, rudeness.

When this occurs, in the first instance you may:

- raise it directly with the employee(s) concerned
- · discuss it with your manager
- seek advice from Human Resources.

Alleged serious misconduct

Examples of alleged serious misconduct include:

- · actions involving substantial risk to the health and safety of others
- a significant mismanagement of Australia Post's assets and resources
- behaviour that is prejudicial to our interests or seriously damages our business or reputation.

If you encounter or suspect serious misconduct, you must report it to your manager or, if this is inappropriate, to the Corporate Security Group or Human Resources.

Whistleblower process

We also have Whistleblower provisions for you to report concerns in a confidential and supportive environment, via an independent, external service provider. The number for this toll-free, 24-hour-a-day service is 1800 799 353.

If your report is made in good faith, it will be documented and promptly investigated, either internally or by external agencies. You will be told the outcomes of the investigation.

You must keep the details of your report confidential; releasing the details could damage the investigation and affect the rights of anyone involved.

Australia Post will take every possible step to protect anyone who reports alleged serious misconduct or suspected criminal behaviour.

Improper behaviour, serious misconduct and suspected criminal behaviour damages our reputation, workplace relationships and culture – it must be reported.



Suspected criminal behaviour

Examples of suspected criminal behaviour include:

Mail – theft, tampering, withholding

(07) 3405 1481

- Fraudulent activity obtaining a financial gain by deception
- Theft property and / or cash.

QLD

on 1800 627 151.

If you encounter criminal behaviour, or suspect it is occurring, you must immediately report the matter to your supervisor or a higher level manager, or telephone the local office of our Corporate Security Group (CSG) on:

 NSW / ACT
 (02) 9202 6051
 SA / NT
 (08) 8402 6434

 VIC / TAS
 (03) 9106 9888
 WA
 (08) 9237 5469

This is a 24-hour-a-day service and your call will be confidential. If you wish to remain anonymous, telephone CSG's national toll-free number

CSG investigates all suspected or alleged criminal behaviour within Australia Post. Where evidence supports the allegation, the matter will be referred to the appropriate authorities or the Commonwealth Director of Public Prosecutions.

Protection for those who report alleged serious misconduct or suspected criminal behaviour

If you report alleged serious misconduct or suspected criminal behaviour, Australia Post will:

- protect you and keep your identity and your disclosure confidential, to the extent the law requires or permits
- not tolerate any reprisals against you for disclosing information in good faith with reasonable grounds
- act in your best interests to protect you from any victimisation, adverse reaction or intimidation.

However, if you knowingly make a false or vexatious report you may face disciplinary action.

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Thank you for taking the time to read this booklet

If you need to clarify anything in this booklet, ask your manager or supervisor.

Remember, embedding our culture pillars and ethical standards into our daily behaviour protects and strengthens Australia Post's reputation – which is the key to success, growth and job security.

