

# HOW WE WORK @TU

## CODE OF CONDUCT

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## **FOREWORD FROM THE CEO**

At Transurban our aim is to create an environment where our people are respected and encouraged to fulfill their potential. We want everybody to be treated fairly and to feel that their contribution is valued. Safety and employee wellbeing are important to our business.

We strive to maintain an open culture where diversity is welcomed and accepted.

Our growth and current position in the market is a direct result of the people who work with Transurban and the contribution they make every day.

We value our external relationships with all stakeholders and want those relationships to be based on mutual trust and respect.

**How we work @TU** outlines how this might be achieved in practice. It's a tool aimed at helping people understand how we want to operate, and to answer some of your questions.

Let us know where we can improve it. You can contact me directly on [feedbacktoscott@transurban.com](mailto:feedbacktoscott@transurban.com) or get in touch with a member of the Human Resources team with any input.

**Scott Charlton**  
CEO

## OVERVIEW OF HOW WE WORK @TU

### WHAT IS HOW WE WORK @TU?

**How we work @TU** is intended to be a simple tool to help you make decisions at work that are aligned with the company values and the way Transurban wants to conduct business. It provides basic information about how we are expected to behave in the workplace and how to treat others whether they work for our business or are external contacts.

It does not replace any of our existing policies or procedures — it is simply a good starting point for getting familiar with the basic principles of them.

It is also important to understand that nothing in **How we work @TU** overrides the laws and regulations of the countries in which we operate.

### WHO NEEDS TO FOLLOW HOW WE WORK @TU?

**How we work @TU** applies to everyone who is employed by Transurban or who works at our offices, including permanent and temporary employees, consultants and contractors.

### WHAT AM I RESPONSIBLE FOR DOING WITH HOW WE WORK @TU?

If you are:

- An employee – you need to ensure you read and understand **How we work @TU**, you follow its principles and spirit, and you ask questions if anything is unclear.
- A manager – you have the additional responsibility of communicating **How we work @TU** to the people you lead and supporting them in understanding and following it.

### WHEN DOES HOW WE WORK @TU APPLY?

**How we work @TU** applies to you whenever you are representing Transurban or undertaking work on our behalf. At times, you may be doing this outside of our offices or outside working hours — but **How we work @TU** is still relevant on these occasions.

### WHAT HAPPENS IF I DO NOT FOLLOW HOW WE WORK @TU?

Not following **How we work @TU** is a serious matter to us and will be investigated to determine if a breach has occurred.

Some breaches may simply warrant a reprimand or warning. However, more serious breaches may result in termination of employment. If you breach the company's policies and procedures and also violate any laws, then legislative enforcement procedures will apply.

### WHERE CAN I GO FOR GUIDANCE ON HOW WE WORK @TU?

If you are uncertain about whether your or someone else's actions are aligned with **How we work @TU**, you should talk to your manager, or any member of the Human Resources, Legal or management teams. A good rule of thumb is that if you have doubts, it's worth raising.

## VALUES

Our Values have been developed to give all employees a clear and defined way to act. They underpin the way we do business and are therefore central to **How we work @TU**. They:

- Provide a consistent framework for how we do business;
- Project what Transurban stands for – to employees, customers and shareholders;
- Guide us through business challenges; and
- Help us to make reliable, unbiased decisions that will stand up to scrutiny.

### We Value

**integrity**  
**collaboration**  
**accountability**  
**ingenuity**  
**respect**

## INTEGRITY

- Have the courage to speak up and do what is right
- Be who you say you are
- Communicate openly and honestly

## COLLABORATION

- Seek and value the contribution of others – do it early, even in the formative stage
- Work together to get the best outcome
- Maintain positive relationships
- Encourage others to succeed
- Identify and use experts – even if outside the team

## ACCOUNTABILITY

- Do as you say you'll do
- Act on what is agreed
- Take responsibility for your actions

## INGENUITY

- Be forward thinking
- Challenge yourself to find better ways of working
- Strive for excellence

## RESPECT

- Appreciate different views and approaches
- Listen and suspend judgement
- Respond to the needs of others
- Value everyone's safety as well as your own
- Contribute to the creation and maintenance of a culture of trust, responsibility and inclusiveness

**How we work @TU** is divided into four sections related to:

- Our people
- Our relationships
- Our reputation, and
- Our community and environment.

Under each section you can get guidance about what Transurban is asking from you, and a list of relevant policies to turn to for further information.

## **OUR PEOPLE**

Our people are what make us successful. Our values help us create a workplace culture where everyone is valued, respected and safe. They remind us of the qualities we should display in order to create and sustain successful relationships within our diverse workforce.

Each one of us can demonstrate the values through the attitudes and behaviours we exhibit every day.

## **OCCUPATIONAL HEALTH AND SAFETY**

Safety is our highest priority, and the company has robust processes in place to provide a safe, healthy environment for our employees, our contractors and visitors. Safety is everyone's responsibility, so we all need to look after our personal safety and the safety of our co-workers.

*Always...report any potential workplace safety hazards immediately.*

## **EQUITY AND DIVERSITY**

We are committed to a workplace that is fair to all and values our differences. We are an Equal Employment Opportunity (EEO) employer, and we do not discriminate on the basis of personal attributes such as race, religion, colour, sex, sexual preference, age, national origin or disability. This applies not only to our employees but to everyone we do business with.

*Always...ensure your decisions and actions reflect the value we place on a fair, diverse workplace.*

## **BULLYING AND HARASSMENT**

In line with our values, everyone who works in our offices or who has contact with our business should be treated with dignity and respect. We will not tolerate bullying and harassment, including sexual harassment.

*Always...seek assistance from your Manager, Human Resources or Equal Opportunity Officer if you suspect or experience bullying or harassment.*

## **DRUGS AND ALCOHOL**

The use of alcohol and/or illegal drugs is not permitted on company premises and employees are expected to come to work free from the influence of alcohol and/or illegal drugs. The only time alcohol use is allowed is at the occasional company event where it is provided by Transurban.

*Always...be sensible and responsible about alcohol use when attending a work or work-related event.*

## **PERSONAL RELATIONSHIPS**

In the workplace, consensual, romantic and/or sexual relationships between co-workers sometimes develop and these relationships are generally a private matter.

*Always...advise Human Resources if you become involved in a relationship where there is a direct reporting arrangement.*

## **FURTHER INFORMATION**

For more details refer to the following Transurban policies:

In Australia:

- WHS Policy
- Employee Relations Policy
- Diversity in the Workplace Policy

In the US:

- Employee Policy Handbook

## **OUR RELATIONSHIPS**

Our business is built on the strength of our relationships with the many groups that make up our marketplace, including customers, governments, suppliers and business partners. It is important to treat our relationships according to our values and to always work to maintain trust between parties.

### **PRIVACY**

In your work, you may come across private and confidential information related to our business, our customers, our suppliers or our contractors. We place great value on maintaining the security and confidentiality of this information, and we ask our employees to do the same. Failure to protect this information is a breach of trust, and can have serious, negative consequences for everyone involved.

*Always...understand the privacy laws that apply where you work and collect any private information in a lawful way and with consent, and dispose of any private information securely when it is no longer needed.*

### **GIFTS**

From time to time employees or contractors may give or receive gifts. If you are given a gift in your capacity as an employee or contractor of Transurban — and the gift is not from someone trying to gain your business — you may be able to keep it even though gifts automatically become the property of the company. You should speak to your manager about whether it is appropriate.

*Always...report gifts valued over \$250 (Australia) and \$25 (US) to your manager.*

## **CONFLICT OF INTEREST**

It is important that we conduct our business with honesty and in accordance with ethical and legal standards. This means as employees we need to ensure our private interests — including those of our family members — are not in conflict with those of the company.

*Always...consult an appropriate manager if you are unsure whether a conflict of interest exists.*

## **POLITICAL CONTRIBUTIONS**

There are times when we may consider providing support to political parties, in line with company policies and public guidelines. However, only authorised people can support or participate in political activities such as fundraisers.

*Always...refer any requests for support of a political party first to the Group General Strategy (Australia), or the President Transurban North America (US).*

## **FURTHER INFORMATION**

For more details refer to the following Transurban policies:

In Australia:

- Privacy Policy
- Political Contributions Policy

In the US:

- Employee Policy Handbook

## OUR REPUTATION

Transurban's business approach shows that everything we do as a business and as employees can have an impact on our corporate reputation. There are a number of critical areas in which employees need to take special care to ensure we protect our reputation.

## CONTINUOUS DISCLOSURE

Because Transurban is a listed company, we have an obligation to immediately notify the Australian Securities Exchange (ASX) of any information we become aware of that a reasonable person would expect to have a material effect on the price or value of our securities. Employees should never release any information about Transurban that is not already known by the public, unless the Company Secretary gives express permission.

*Always...ensure you have any materials for public release checked and approved by someone in the Legal team in Australia or the US.*

## RISK MANAGEMENT

Risk to our business can take many forms. For example, there are physical risks, business process risks and financial risks. We have a risk management framework in place that helps us identify and manage any type of risk. In our day to day work, we are all accountable for managing risk in our own area.

*Always...take prompt action when any risk is identified and advise your manager.*

## INTELLECTUAL PROPERTY/CONFIDENTIAL INFORMATION

Transurban's intellectual property should only be used for work-related purposes, and employees should be diligent about keeping company information confidential.

*Always...make sure confidential files (hard copy or electronic) are kept secure at all times.*

## INTERNAL RESOURCES

At Transurban we treat our corporate infrastructure and workplaces with care and respect. All of Transurban's systems and equipment are to be used responsibly and for appropriate purposes. This includes email, networks and internet access. Employees should not use unlicensed or pirated software or do any unauthorised copying of software.

*Always...report any loss, damage or theft of company property, and always keep your log-on and password to yourself.*

## INSIDER TRADING

There are specific 'open periods' during the year when employees or related parties (such as family members) are allowed to trade in Transurban (TCL) securities. However, employees must not deal in securities at any time if they have information which is not publicly available and which will materially affect the price of the securities.

*Always...follow company procedures when buying and selling TCL securities to avoid any form of insider trading.*

## FRAUD

Our values support a workplace culture that fosters high standards of ethical behavior. Transurban has effective controls in place to reduce the opportunity to conduct any fraudulent acts.

*Always...report any suspicions of fraud or unethical behaviour to your manager or Human Resources immediately.*

## FURTHER INFORMATION

For more details refer to the following Transurban policies:

In Australia:

- Continuous Disclosure Policy
- Risk Management Policy
- Dealing with Securities Policy
- Whistleblower Policy

In the US:

- Employee Policy Handbook

## **OUR COMMUNITY AND ENVIRONMENT**

At Transurban, environmental sustainability is serious business, and we respect and care about the different communities in which we work. As well as working with local communities, we also like to give something back. This will take a different form in different locations but the intention is the same, providing value to the communities in which we work.

### **ENVIRONMENTAL SUSTAINABILITY**

We are dedicated to ensuring we have minimal impact on the environment and believe we can make a positive difference if we work together on sustainable business practices. We also must comply with all applicable environmental laws in the locations where we work.

*Always...look for opportunities to be more sustainable in your daily work, whether it is through reducing your paper use, increasing your recycling or cutting down on energy consumption.*

### **RESPECTING THE COMMUNITIES IN WHICH WE OPERATE**

We are committed to understanding how we impact the communities surrounding our roads. We work closely with these communities to understand their unique local issues and any broader community issues, and we put plans in place that will contribute to livability and minimise potentially negative impacts.

*Always...be transparent and accountable when interacting with our communities, and work to find common ground.*

### **FURTHER INFORMATION**

For more details refer to the following Transurban policies:

In Australia:

- Sustainable Purchasing Policy
- Supplier Code of Conduct
- Sustainability Framework

In the US:

- Employee Policy Handbook
- Sustainability Framework



[www.transurban.com](http://www.transurban.com)

