

WSA Policy Statement of Business Ethics

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Revision: 01 15/10/2019	Melanie Burnicle Company Secretary & Corporate Counsel	Katie Newton-John General Counsel and Company Secretary	WSA Board
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Main Changes: Updates to align with the <i>National Anti-Corruption Commission Act 2022</i> (Cth) and the <i>Public Interest Disclosure Amendment (Review) Act 2022</i> (Cth).			

Related Documents

This policy should be read in conjunction with the related documents listed in the table below.

Document Number:	Document Description:
WSA00-WSA-00000-HR-POL-000001	Code of Conduct
WSA00-WSA-00000-HR-POL-000002	Confidentiality Policy
WSA00-WSA-00000-HR-POL-000003	Conflict of Interest Policy
WSA00-WSA-00000-CP-POL-000005	Whistleblower Policy
WSA-LS-PRO-000001	Facilitating and Dealing with Public Interest Disclosures (PIDs) Procedure
WSA-LS-PRO-000001-Appx A	Appendix A - PID Act Information Sheet for Disclosures Procedure
WSA-LS-PRO-000001-Appx B	Appendix B – Whistleblower Protection Scheme Information Sheet for Disclosures Procedure
WSA00-WSA-00300-CP-POL-000001	Procurement Policy and Manual
WSA00-WSA-00000-HR-POL-000001	Code of Conduct

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For enquiries regarding the licence and any use of this publication/document, please contact: **Steven van der Donk** | **Chief Legal Officer**, WSA Co Limited, PO Box 397 Liverpool NSW 1871

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1. What is this Policy about?

The Statement of Business Ethics provides a statement on the key business principles WSA adheres to in business dealings with all stakeholders and business partners. WSA expects and requires the same commitment to these business principles from all its stakeholders and business partners.

2. Introduction

2.1. To whom does this Policy apply?

The **Statement of Business Ethics** applies to all WSA leaders, employees and secondees (**WSA Personnel**), as well as contractors and suppliers (**Contractors**) at WSA workplaces.

2.2. Policy review

The **Statement of Business Ethics** will be updated every 3 years unless updates required.

2.3. Policy availability

This policy is available to be accessed on the **WSA Published Documents SharePoint** site. Currency and accuracy cannot be guaranteed if sourced from other locations.

3. WSA Code of Conduct

WSA Personnel are expected to abide by the WSA "**Code of Conduct**".

The WSA "**Code of Conduct**" together with this "**Statement of Business Ethics**" are available at www.westernsydney.com.au

4. WSA Values

WSA promotes and abides by certain important and fundamental corporate values. WSA expects all its stakeholders and business partners to support and act according to these values. WSA's values are as follows:

- **Safety**
- **Integrity**
- **Inclusion**
- **Pioneering**
- **Courage**
- **Passion**

In addition, WSA adopts the highest standards of professional and ethical conduct including:

4.1. Respect for People

Treat all people with respect, dignity, fairness and equity.

4.2. Act Professionally

- Act at all times in a professional manner.
- Act lawfully, fairly and honestly.
- Maintain appropriate records of decision-making.

4.3. Conflicts of Interest

WSA requires all stakeholders and business partners, potential or contracted, to avoid all conflicts of interest and where interests exist, such interests are to be declared in writing.

4.4. Open, Fair and Honest

WSA operates as an open, fair and honest business partner.

4.5. Confidentiality

Where Contractors receive confidential or proprietary information in dealing with WSA, WSA expects all such information to be properly controlled and should not be released to any other third party without the express prior written authorisation from WSA.

5. Procurement Guiding Principles

WSA observes the highest ethical standards and conduct for all procurement projects and processes. WSA Personnel must pursue the best value for money on behalf of WSA, whilst demonstrating:

- high levels of integrity and impartiality; and
- acting fairly, ethically and with transparency.

All WSA Personnel, as well as Contractors, are required to:

- act at all times in a professional manner;
- act lawfully, fairly and honestly;
- be committed to a safe and healthy workplace and environment;
- maintain appropriate records of decision-making;
- be accountable and accept accountability; and
- act impartially and not give preferential treatment to any respondent or individual.

Please see the WSA Procurement Policy and Manual for further details.

6. Procurement Process

WSA's Procurement Plan and further information on the WSA's procurement activity can be found on www.westernsydney.com.au

7. What Suppliers Can Expect from WSA

Contractors can expect all WSA Personnel to act in accordance with this Statement of Business Ethics in all business dealings, including procurement processes.

8. What WSA Expects from Contractors

WSA requires contractors to act in accordance with and align themselves with this Statement of Business Ethics.

Additionally, Contractors must:

- **Commit to Safety** - Safe performance of work at all times and as a priority; and
- **Comply with the Competition and Consumer Act 2010** - The Competition and Consumer Act 2010 is in place to promote fair trading and competition.

Contractors should be aware of the consequences of not complying with WSA's ethical requirements, including WSA's Anti-Bribery and Corruption Policy, when doing business with WSA.

Demonstrated wrongful conduct by Contractors could lead to:

- termination of contracts;
- loss of future work;
- loss of reputation;
- investigation for wrongful conduct; and
- matters being referred for criminal investigation.

9. Guidance Notes

The following Guidance Notes aim to assist all stakeholders and business partners to understand how to conduct themselves, in terms of the requirements of this Statement of Business Ethics, as it relates to certain specific matters.

9.1. Gifts & Hospitality

WSA encourages high levels of integrity in all its business operations. For this reason, WSA does not permit WSA Personnel to accept gifts or hospitality above a reportable limit as set out in WSA's Gifts & Hospitality Policy. Acceptance of such gifts or hospitality could be perceived to influence business decisions, including decisions required to be made in procurement processes.

WSA Personnel are required to immediately report any offers of gifts or benefits in excess of the reportable limit as such offers breach the Statement of Business Ethics as well as the WSA Gifts and Hospitality policy.

9.2. Communication Between Parties

To minimise the risk of a perceived inappropriate influence being brought to bear on business relationships, all communication between WSA Personnel and Contractors should be clear, direct, in writing and accountable.

Contractors are not permitted to discuss WSA's business or information publicly in the media, online or in any other publication or at any event without prior written approval from WSA.

9.3. Confidentiality

WSA expects each of its Contractors to take all reasonable steps to protect any confidential information received, unless required to disclose it by law.

9.4. Conflicts of Interest

WSA Personnel and Contractors need to be confident that all decisions made by WSA are impartial. To achieve this, all WSA employees are required to avoid conflicts of interest and to disclose any actual, perceived or potential conflicts of interest. WSA extends this requirement to its Contractors.

9.5. Intellectual Property Rights

In business relationships with or for WSA, parties will respect each other's intellectual property rights and will formally negotiate any access, licence or use of intellectual property.

10. WSA Contacts

The WSA Company Secretary may be contacted to assist with any additional information required about this Statement of Business Ethics, or indeed on any matters addressed by this Statement of Business Ethics.

10.1. Reporting Possible Wrongful Conduct

If you wish to provide information about suspected wrongful conduct (including disclosable conduct, misconduct and corrupt conduct) please contact WSA directly, as set out below.

Instances of wrongful conduct includes, but is not limited to:

- fraud;
- discrimination;
- breaches of WSA's Code of Conduct;
- breaches of the *Corporations Act 2001* (Cth);
- breaches of the *Tax Administration Act* (Cth);
- corrupt conduct and corruption issues (including as defined by the *National Anti-Corruption Commission Act 2022* (Cth)); and
- disclosable conduct (as defined in the *Public Interest Disclosure Act 2013* (Cth)).

If you honestly believe on reasonable grounds wrongful conduct has occurred, it can be reported to management or otherwise in accordance with WSA's Whistleblower Policy.

11. Further Information

In addition to compliance with this policy, further information and obligations are contained within other WSA Policies.

Any employee who requires assistance in understanding this Policy should first consult the divisional executive. Should further information be required, please contact WSA's Company Secretary.