



Code of Conduct

Our Code



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1. Our code

Our Code of Conduct (referred to as Our Code) is fundamental to who we are, what we do and how we behave.

Our Code is underpinned by Our Values. It sets out the principles, practices, and standards of personal and professional behaviour you must adopt in your daily activities.

Our Code is supplemented by rules and guidance set out in MLPL's policies, procedures, and guidelines. In addition to complying with Our Code, our people must comply with any laws or regulations that apply to their role and activities.

1.1 Purpose

Marinus Link Pty Ltd (**MLPL**) as an organisation is expected to:

- Conduct its activities legally, ethically and with integrity and accountability – and in a way that enhances the reputation of MLPL in Australia's renewable energy sector; and
- Manage and use the resources entrusted to it responsibly and in a manner that is efficient, effective, economical, and ethical and promotes its financial sustainability.

This requires everyone working with MLPL to play their part and meet the standards of conduct set out in this Code of Conduct in all dealings and interactions with MLPL and those with whom we engage.

1.2 Scope

Our Code covers and applies to the Board, employees, contractors, consultants, advisors, volunteers, and visitors to our workplace (referred to in this Code of Conduct as "our people") in relation to conduct in our workplace or connected with our work.

Our Code does not form part of any contract of employment and does not create a separate contract of any kind. However, those covered by Our Code are expected to always comply with this policy in the course of their employment or engagement with MLPL.

2. Our values

Everything we do is guided by Our Values, inspired by Our Purpose, and informed by Our Strategy.

Delivering Marinerus Link safely, on time and on budget



3. Applying our code

Our Code makes clear everyone's responsibilities, which apply at work and work-related events and activities, including after-hours events and while travelling on MLPL business.

MLPL requires everyone who works for us, with us, or on our behalf to:

- **Know their responsibilities** under Our Code. Read and understand Our Code and complete required Code of Conduct training.
- **Comply** with Our Code and other policies, standards, processes, and procedures that apply to their role and activities.
- **Apply Our Values** to everything they do at work.
- **Speak up** when they observe anything that's not right or inconsistent with Our Code.

3.1 MLPL leaders

At MLPL, our leaders play a vital role in fostering compliance with Our Code and creating an environment where our people feel safe, respected, and free to speak up without fear of retaliation.

Our leaders at MLPL must:

- Lead by example, applying Our Code, living our values, and always promoting ethical behaviours.
- Ensure everyone in their team (including contractors and service providers) are aware of their responsibilities under Our Code.
- Foster a respectful working environment where team members feel safe (physically and psychologically) and free to speak up and raise questions or concerns.
- Ensure everyone in their team complies with Our Code at work-related events and out-of-hours activities.
- Speak up and report any breaches of Our Code they become aware of, including those reported to them.
- Ensure everyone in their team is aware of the legal obligations and requirements that impact on their areas of responsibility and completes their required Code of Conduct Training.

4. What is expected

4.1 General conduct

Our people will:

- Act ethically and in a way that upholds MLPL's integrity and good reputation.
- Act with care and diligence and in the best interests of MLPL.
- Be familiar with and comply with all applicable laws, regulations and MLPL policies and procedures, including our policies with respect to respectful workplace interactions, conflicts of interest, fraud, and corruption.
- Treat all people, internal or external to the workplace, when representing MLPL with respect and courtesy, recognising social and cultural differences.
- Recognise the value and respect the diversity, heritage, knowledge, cultural property, and connection to land of First Nations Peoples.
- Perform duties competently and with professionalism, rigour, honesty, and integrity.
- Comply with any lawful and reasonable direction given by someone at MLPL who has authority to give such directions.

- If employed by MLPL or engaged as a contractor filling an organisation chart role, complete mandatory Code of Conduct training on commencement of employment or engagement and refresher training each year, as required by MLPL.

4.2 Other behaviour

Our Code establishes clear expectations of behaviour and responsibility for our people to meet our regulatory and compliance obligations, promote workplace diversity, and create a safe and positive working environment.

This Our Code addresses the following key topics:

People and Environment	Protecting our Interests and Reputation	Protecting our Information and Property	Working with Others
People	Conflicts of Interest	Confidentiality and Privacy	Working Together
Safety and Wellbeing	Work Outside MLPL	Managing MLPL's Information and Intellectual Property	Working with our Shareholders
Environment	Gifts, Benefits and Entertainment	Procurement and Contract Management Activities	Working with Communities
Sustainability	Fraud, Bribery and Corruption	Using and Protecting our Resources	
First Nations Peoples	Public Communications	Cybersecurity	

5. People and environment

5.1 People

At MLPL, we aim to create a working environment that is safe and free from unlawful discrimination, sexual harassment, harassment, bullying, and violence – and promote appropriate and respectful standards of workplace conduct in all work-related interactions. Our people have a responsibility for, and a role to play in, achieving this.

Our people will:

- Act in accordance with our **Respect at Work Policy**, **Diversity Equity and Inclusion Policy** and **Acceptable Use Policy**.
- Our people will treat all people in the workplace fairly and with respect and do not engage in any unlawful or other inappropriate workplace conduct, including without limitation discrimination, harassment, sexual harassment, bullying, or violence.

When working overseas, they will:

- Act in accordance with the policies referred to above as well as our **Travel Policy**.
- Familiarise themselves with local behaviours, practices, and customs, and be sensitive to actions or behaviours that may be acceptable in one culture but not in another.
- Behave in a way which upholds the good reputation of MLPL and Australia.

5.2 First Nations Peoples

We are committed to building and maintaining respectful relationships with First Nations Peoples in the areas we are active.

We understand the importance of identifying and working with those who have longstanding cultural and spiritual connections to land and waters where we have a presence.

We respect and are committed to protecting cultural heritage by ensuring our cultural heritage management processes are thorough, transparent, and underpinned by engagement.

5.3 Safety and wellbeing

MLPL is committed to a safe and healthy workplace and prioritising the physical and psychosocial health, safety, and wellbeing of our people. Our people will take reasonable steps to ensure the safety of colleagues, themselves, and others in the workplace.

Our people will:

- Ensure they are aware of, and comply with, workplace health and safety legislative requirements and MLPL safety and wellbeing policies and procedures.
- Comply with any lawful and reasonable directions given by MLPL.
- Engage in processes directed at determining fitness for work.
- Not exceed a blood alcohol content of 0.0% at work, except for responsible and limited alcohol consumption at an approved work function, or approved events, and not take or test positive to illicit drugs while attending for work or engaged in work-related activities.
- Be familiar with emergency procedures and ensure that any contractors or visitors to the workplace or work sites are also familiar with these procedures.

- Report any safety hazards and incidents to a leader, a member of the Safety team, and via the MLPL digital reporting system as soon as practicable.

5.4 Environment

MLPL commits to integrating environmental principles into our activities over the entire lifecycle of our assets including minimising our environmental footprint, promoting biodiversity, managing our resources efficiently and strengthening our actions on climate change. Our people will take all reasonable steps to keep our planet healthy.

Our people will:

- Be aware of, and comply with, applicable environmental legislative requirements and MLPL environment policies, procedures and processes, and general environmental duties at law.
- Identify, assess, and take necessary steps to avoid the risk of damage to the environment and cultural heritage associated with their work.
- Undertake all work in compliance with environmental approvals and cease work that is hazardous to the environment.
- Report all environmental incidents to a leader and a member of the Environment team so the necessary action can be taken.

5.5 Sustainability

MLPL commits to integrating sustainability principles into our activities over the entire lifecycle of our assets. In addition to keeping our planet healthy, this includes creating and contributing to prosperous communities and being a trusted organisation. In doing this we act with transparency, integrity, and accountability. Our people will act in accordance with our **Sustainability Framework** and **Environment and Sustainability Policy**.

Our people will:

- **Community Prosperity**
 - Strengthen relationships by listening, understanding, and learning from traditional owners.
 - Understand our landholders and the local community needs and working with governments and local partners to leave a positive legacy.
 - Facilitate pathways to inclusive employment that supports the renewable energy transition.
- **Being a trusted organisation**
 - Listen and work respectfully with all stakeholders.
 - Create and maintain a safe, inclusive, and collaborative working culture.
 - Be clear about the end consumer costs and benefits of Marinus Link.

6. Protecting our interests and reputation

6.1 Conflicts of interest

Our people will act in accordance with our **Conflicts of Interest Policy**.

Our people will:

- Take reasonable steps to avoid any actual, potential, or perceived conflicts of interest in connection with their MLPL employment or engagement and, where conflicts of interest cannot be avoided, identify, declare, and actively manage them.
- Declare any private interests held by themselves or a member of your immediate family which conflict, or may appear to conflict, with the interests of MLPL.

If unsure, contact your leader or a member of the Governance and Legal Team.

6.2 Work outside MLPL

If employed by MLPL or engaged as a contractor filling an organisation chart role, our people will receive prior written approval from their leader before:

- Engaging in paid work outside of MLPL; or
- Engaging in unpaid work outside of MLPL where there is a potential conflict of interest.

If unsure, contact your leader or a member of the Governance and Legal Team.

6.3 Gifts, benefits and hospitality

It is important that all our employees understand how to manage offers of gifts, benefits, and hospitality, as the inappropriate offer and acceptance can create a conflict of interest between a private interest and a duty to MLPL and/or create the perception that business decisions have been made because of these benefits and not on the basis of fair judgement.

Our people will act in accordance with our **Gifts and Benefits Policy**.

If unsure, contact your leader or a member of the Governance and Legal Team.

6.4 Fraud, bribery and corruption

Our people will:

- Act in accordance with our **Fraud and Corruption Policy** and not engage in fraudulent conduct, bribery, or seek to corrupt others. Without limiting the obligations in that policy, in dealings with others in Australia or overseas, our people will ensure all fees and other payments required to conduct business are legal, made in a transparent manner, and properly recorded.
- Not make improper use of information acquired while working for MLPL to gain an advantage for themselves or others, or to cause detriment to MLPL, or to another person.

Any of our people who have knowledge of a fraudulent activity or incident, or have reason to suspect that fraud or corruption has occurred, has an obligation to immediately report the matter to the Executive Manager, Governance and Legal.

Suspected breaches also can be reported in accordance with our **Whistleblower Policy**.

6.5 Public communications

Communication with the public, including through the media, will be consistent with **Code of Conduct**, **Respect at Work Policy**, **Corporate Affairs Policy**, **Information Management Policy**, and **Privacy Policy**.

In engaging in public communication, our people will:

- Consult their leader if intending to publish or comment in a private capacity, on matters relating to MLPL, and seek approval; and
- With such approval, when representing a private view, state clearly that comments represent a personal view as a private citizen, and do not represent the views of MLPL.

Our people will not in any circumstances make statements that are harmful to the reputation of any other member of MLPL in a public forum, including social networking forums and platforms and social media – even if this represents a “private view”.

This includes:

- Defamatory statements.
- Statements or images that could amount to discrimination, harassment, sexual harassment or would otherwise constitute a breach of our **Respect at Work Policy**.
- Derisive or disparaging comments directed at MLPL or any of our people.
- Purporting to speak on behalf of MLPL or making statements (including media statements) on behalf of MLPL without the appropriate approvals detailed within our **Delegations Framework**.

7. Protecting our information and property

7.1 Confidentiality and privacy

Our people will:

- Act in accordance with our **Privacy Policy, Information Security Policy and Information Management Policy** and the obligations in individual contracts with respect to confidentiality and privacy.
- Act in accordance with any legal professional privilege guidelines adopted by MLPL and maintain and protect MLPL's legally privileged information.
- Maintain confidentiality of information, including MLPL's commercial information, at all times.
- Observe the confidentiality and privacy of personal information held by MLPL.

Our people will not:

- Use or disclose MLPL's confidential information without prior approval from an authorised representative of MLPL.
- Collect, use, or disclose personal information other than in accordance with our **Privacy Policy**.

Confidential information includes but is not limited to:

- Information relating to MLPL, its people or its work, including interactions with governments, which is not publicly available.
- Confidential government information and information of third parties which our people may have access to, or become aware of, because of their work with MLPL.
- Personal information, which is defined in legislation but can generally be information or an opinion about an identified individual, or an individual who is reasonably identifiable.

If unsure, contact your leader or a member of the Governance and Legal Team.

7.2 Managing information and intellectual property

Our people will:

- Act in accordance with our **Information Security Policy, Information Management Policy** and the obligations in individual contracts with respect to the creation, use, sharing, security, and destruction of all MLPL documents, information, and records.

- Manage MLPL’s intellectual property rights, and the rights that MLPL has in respect of third-party intellectual property, in accordance with any intellectual property management plan adopted by MLPL and other relevant obligations (including contractual obligations).
- Ensure the proper storage of, and retention and access to, records, including the confidentiality and security of information.

7.3 Cybersecurity

Cyber attacks are an ever-growing threat and can result in serious impact. Protecting MLPL’s electronic presence and systems from malicious cyber activity relies on the awareness and vigilance of our people to identify and report any suspicious activities.

Our people will:

- Be vigilant of potential cyber attacks that could be launched against MLPL including spam and fraudulent or phishing emails.
- Comply with our **Information Security Policy** and **Information Management Policy**.
- Report any suspicious or unauthorised cyber activity and assist with any enquiries concerning potential cyber security incidents.
- All our people must complete the online cybersecurity training on an annual basis.

7.4 Procurement activities

Our people will:

- Act in accordance with our **Procurement Policy**, **Fraud and Corruption Policy**, **Conflicts of Interest Policy**, **Probity Policy**, and **Delegations Framework** in respect of all procurement activities.
- Not engage in fraud or other dishonest conduct with the objective of obtaining money or other benefit from, or of evading a liability to, MLPL or a third party connected with MLPL.

Our people may only incur expenditure, sign contracts, or make any other commitment on behalf of MLPL in accordance with delegations and authorities formally assigned to them under our **Delegations Framework**.

7.5 Using and protecting MLPL resources

Our people will:

- Act in accordance with our **Asset Management Policy, Procurement Policy, Corporate Credit Card Policy**, and **Travel Policy**.
- Use MLPL resources (including money, property, facilities, equipment, and information systems) lawfully, efficiently, and only for activities related to their work (other than to the extent expressly authorised by MLPL in accordance with policy).
- Comply with MLPL's physical and information technology security requirements and take care to prevent waste, loss, damage, misuse, or theft of MLPL resources.

8. Working with others

8.1 Working together

Our relationships with government, industry, partners, suppliers, and the community are a key part of how we deliver the Marinus Link project. We value working together with companies and other bodies to deliver on commitments and common goals. Our relationships are built on trust and mutual respect.

Our people will:

- Act in accordance with our **Stakeholder and Community Engagement Strategy, Respect at Work Policy, Diversity, Equity and Inclusion Policy, Safety and Wellbeing Policy, Environment and Sustainability Policy, Procurement Policy, Probity Policy, and Risk Management Policy**, and any relevant policy not identified by this document, when working with others.

8.2 Working with government

When working with government, our people will:

- Provide frank, honest, comprehensive, accurate and timely advice.
- To the extent possible, respect protocols when providing communications with government via Executive Managers and Governance and Legal streams.

8.3 Working with communities

When engaging with the communities in which we work, our people will:

- Follow established community engagement protocols and processes.
- Engage with communities affected by our operations and take their views into consideration in decision making.
- Respect cultural sensitivities.
- Respect the traditional rights and culture of First Nations peoples.
- Take action to protect the environment.

9. What if we don't comply?

Breaches of this Code of Conduct may amount to misconduct – and in some cases serious misconduct – and may be dealt with in accordance with the MLPL **Issues and Complaints Resolution Procedure** and / or **Whistleblower Policy** and / or **Fraud and Corruption Policy**.

If you are found to have acted in breach of this Code of Conduct, you may be subject to disciplinary action, up to and including termination of your employment if you are an employee, or your engagement if you are a contractor, consultant, advisor, volunteer, or visitor.

In some cases, a breach of this Code of Conduct could also amount to a breach of law – meaning you may be personally legally responsible for your own unlawful conduct. In certain circumstances, MLPL may also be held legally responsible (i.e., for acts of discrimination and harassment in the workplace). MLPL expects strict adherence to the requirements in this Code of Conduct and treats any breaches seriously.

Stephanie McGregor

Stephanie McGregor
Chief Executive Officer
Marinus Link Pty Ltd

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