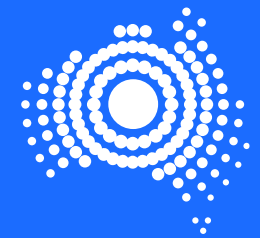


nbn<sup>®</sup>



# NBN CODE OF CONDUCT.

March 2024  
*Updated August 2024*



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# OUR PURPOSE, STRATEGY AND VALUES



nbn's purpose is to lift the digital capability of Australia. We execute this purpose by being:

- First and foremost, customer-led;
- Superb in service delivery to retailers, developers, and customers;
- Growth oriented – growing market share and revenue;
- A reliable, secure, and resilient network operator;
- Upgrading the network to deliver greater capability;
- Simplifying architecture, processes, IT systems, and data;
- A great partner that is easy to do business with;
- Nimble and efficient, with fast and delegated decision making;
- A participant in industry sustainability and policy reform; and
- Engaged, diverse, and inclusive, with a workforce that is ethical and purpose-driven.

We achieve our purpose through displaying our values. nbn's values are critical—they guide the company's decisions and actions, and define how nbn treats its customers, the communities it serves, and employees. nbn's values are: We Care, We are Fearless, We are One Team, and We Deliver.

nbn's Purpose, Strategy and Values come together to enable the products and services we offer, supporting the homes and businesses of Australia to work, learn, and connect, and providing social, economic, and environmental benefits for our customers, communities, and country.



# CEO MESSAGE

## **nbn's purpose is to lift the digital capability of Australia**

nbn was established in 2009 by the Commonwealth of Australia as a Government Business Enterprise with a clear direction—to design, build and operate a wholesale broadband access network to serve our nation.

The expectations and requirements set out in this Code apply to all nbn [employees](#), [contractors](#), and [Directors](#). For our suppliers, customers, and the general public, it communicates who we are and what we stand for.

We take behaviours at nbn seriously, because how we go about lifting the digital capability of Australia is as important as the connectivity that we deliver to homes and businesses.

The Code connects what we do and how we do it with our commitment to the community, and to the legal and regulatory frameworks that apply to us.

If you are part of nbn, it is your responsibility to understand this Code and ensure that you comply with it and act with integrity. The requirements set out here apply to each of you.

If you are reading this Code as a member of the broader Australian community, we hope that we have and will continue to earn your trust. We would not exist without you.

A handwritten signature in black ink, appearing to read 'Philip Knox'.

Philip Knox  
Interim Chief Executive Officer

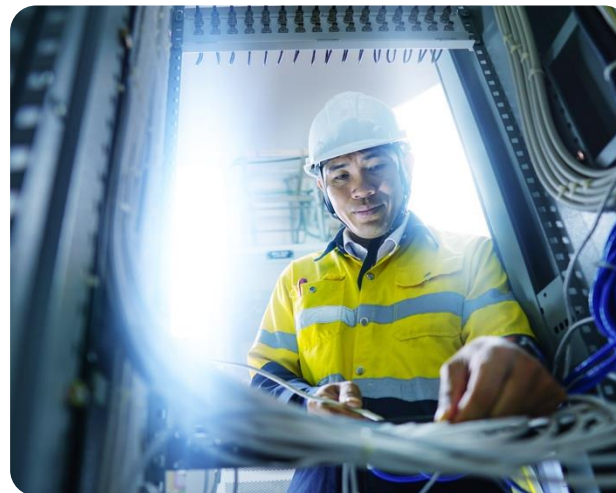
# OUR CODE AND YOU

nbn is committed to maintaining the highest standards of professionalism, honesty, integrity, and fairness in the way we work.

This commitment includes providing a safe, respectful, and inclusive workplace, and expecting everyone to treat each other at work, or connected to the work we do, with respect, courtesy, and inclusivity. It is important we treat each other with dignity and respect, so that we can all feel safe at work, increase productivity, and allow everyone to feel more fulfilled.

We expect everyone to share in the responsibility for living out this commitment, including by behaving in a way that ensures the safety and wellbeing of others, and is respectful and inclusive. This means we are proactive in seeking to eradicate unlawful and harmful behaviours.

These behaviours extend across a broad range of areas, including: how we interact with one another, customers, and the public; how we handle information that we encounter in the course of our roles; and how we protect nbn's assets and ensure that we commit any spending responsibly.



It is everyone's individual responsibility to make sure that they understand this Code and ensure that it informs the actions that you take, whenever and wherever you represent nbn. That includes when you interact with colleagues or nbn's partners, customers, and key stakeholders, including during and after normal working hours and in locations wherever work or work events are taking place or where your interactions have the potential to impact nbn such as activities on social media.

You must complete all mandatory training relating to this Code and other nbn corporate policies, including role-specific training.

Not everything is included in the Code—practical details are covered in either other corporate policies or in guidance documents. It is your responsibility to review that information and ensure that you understand it.

While the Code does not form part of your contract of employment (for employees) or terms of engagement (for contractors), breaching it may result in disciplinary action – and could lead to termination of your employment or engagement with nbn.

Our Code is reviewed and renewed annually to ensure it is both accurate and reflects nbn's priorities.



# OUR REGULATORY AND POLICY CONTEXT

# OWNED BY THE GOVERNMENT IN SERVICE OF AUSTRALIA

## Working at nbn is unlike working at any other company

In part, that is because we have the unique mandate of lifting the digital capability of Australia.

We are subject to laws, regulations, and other instruments that apply to telecommunications, critical infrastructure, construction, or companies more generally, as well as certain rules that exist for nbn alone. In addition, nbn raises financing in the global debt capital markets, and have stakeholder obligations that must be met as a result.

All of these requirements must be followed while acting in a commercially responsible manner and competing effectively with other telecommunications providers.

A key element of this framework is nbn's status as a Government Business Enterprise (GBE), which means that it is wholly owned by the Australian Commonwealth Government. nbn has two Shareholder Ministers: The Minister for Finance and the Minister for Communications. nbn accordingly is required to keep its Shareholder Ministers across significant events and decisions and is expected to observe their strategic guidance as set out in the [Statement of Expectations](#).

As a GBE, nbn is expected to establish and maintain a Code of Conduct for its employees, contractors, and Directors, and to avoid activities that could give rise to questions about its political impartiality when undertaking business activities.

### Business references

Business references are recommendations regarding a person or company that has done work for nbn.

Given our Government ownership status, nbn does not typically provide business references and employees and contractors must not do so on its behalf. This rule applies to any business reference or recommendation, whether verbal or written.

Under no circumstances may nbn provide business references to its retail service provider customers (even when they supply retail services to nbn), including because of the statutory non-discrimination obligations that require nbn to provide equality of opportunity for them.



# COMPLIANCE AT NBN

When we talk about “compliance” at nbn, we don’t mean doing the minimum that laws and regulations demand of us. Sometimes it will mean doing more, or perhaps going about things in a different way. Compliance done well helps build nbn’s social licence and enables commercial success.

nbn’s regulatory framework is unique, which means that sometimes we need to approach operational or commercial issues in a different way than at other companies.

## What does this mean for you?

Everyone at nbn has a role to play in compliance, both to avoid breaching our compliance obligations and to leverage its potential as a means of building trust, attracting customers, and enabling growth.

You are responsible for understanding the basics of our regulatory environment and the key obligations that are set out in this Code, other corporate policies, or in mandatory training. Ignorance is no excuse.

You are also responsible for doing what is asked of you by our subject-matter experts to manage those obligations at the appropriate standard.

When asked by colleagues to provide inputs into statutory or regulatory reports or other documentation, you must do so to the best of your ability, including to ensure factual accuracy.

## Always

- Be curious and creative—do your best to understand nbn’s unique regulatory environment and work collaboratively with subject-matter experts to find commercial solutions that also satisfy our compliance obligations.
- Prioritise activities you are asked to do to ensure nbn manages its compliance obligations appropriately.
- Speak Up and report genuine concerns or incidents to your manager, to Enterprise Compliance, or via the other mechanisms outlined in this Code if you are concerned we might not be doing the right thing.
- Comply with internal processes and procedures designed to ensure compliance with nbn’s statutory and regulatory requirements and corporate governance aims. These relate to a broad range of activities, such as product development and pricing, financial and other decision-making (including nbn’s delegation of authority rules), and other aspects of nbn’s compliance framework.

## Never

- Dismiss compliance with nbn’s key obligations due to speed to market or other commercial concerns.





# NBN'S REGULATORY LANDSCAPE

**nbn operates in a unique environment that is designed to protect both industry participants and the public**

nbn is both a commercial and a highly regulated business.

We are subject to overlapping layers of laws and regulations: those that apply to all Australian businesses, to GBEs, to the telecommunications industry, and nbn specifically.

This combination means that sometimes we need to go about product development, product changes, and other activities in a different way than at other telecommunications companies.

Some compliance obligations are connected to the creation of nbn as an enterprise designed to uplift the digital capability of Australia and reflect the high expectations of how nbn interacts with the rest of the telecommunications industry. These rules focus on nbn's unique place in the market and society and include strict requirements around product development and supply.



## Key aspects of nbn’s regulatory landscape

### All enterprises

#### Competition laws

Competition laws exist to promote robust commercial competition in Australia, leading to lower prices and more choice for consumers, and to encourage the supply of better-quality products and services.

These rules prohibit a range of anti-competitive conduct, including the use of market power to reduce other companies’ ability to compete, such as setting prices below costs. They also prohibit certain arrangements with others, like cooperating with competing businesses to fix prices (also called cartel behaviour) or entering into exclusive supply arrangements that limit competition.

Breaking these laws can have serious consequences, including significant company fines and even criminal convictions for individuals, as well as broader impacts such as reputational damage.

#### Consumer laws

Consumer laws apply to govern how commercial companies engage with their suppliers and customers.

These rules include that commercial businesses must not engage in misleading or deceptive conduct or make false or misleading statements relating to their products or services.

Commercial businesses must also ensure that they do not engage in unconscionable conduct and that their standard contract terms with consumers and small businesses are fair.

### Telecommunications industry

#### Telecommunications

Telecommunications industry laws apply to nbn in its roles as a carrier (providing communications infrastructure) and as a carriage service provider (providing communications services).

In some cases, nbn must share its network with other carriers or with emergency service organisations.

When working on the network, we must not interfere with other carriers’ infrastructure, which is a criminal offence.

As a carrier, we have powers to enter onto public and private land related to building and maintaining the network but need to comply with rules for providing notice and governing our conduct when doing so.

#### Non-discrimination obligations (NDOs)

nbn’s NDOs are in place to ensure that nbn does not “discriminate” between acquirers (current and potential) of our telecommunications services and related activities.

In general, this means that nbn must provide them with equality of opportunity in relation to those services and activities, including development, planning, enhancing, extending, and supplying our products, services, and network, providing information about these activities, and any related work.

NDOs apply to some fixed broadband carriers, including nbn. Competing network owners that supply residential fixed-line broadband services must comply with NDOs similar to nbn’s for residential broadband services and related activities.

### Only nbn

#### Line of business

nbn is restricted in the types of products and services it may offer.

nbn may only supply wholesale communications services to telecommunications or content service providers. We may not supply those services directly to members of the public or to non-telecommunications businesses.

We are not allowed to supply content services, including broadcasting services, and we are limited in when we can supply non-communications services or goods that are not for use with our wholesale communications services.

#### Special Access Undertaking (SAU)

nbn’s SAU is an undertaking given by nbn to the Australian Competition & Consumer Commission (ACCC). The SAU was originally accepted by the ACCC in December 2013 and is a key part of the regulatory framework that governs the prices and non-price terms on which nbn supplies services to access seekers.

In October 2023, nbn’s proposed variation to the SAU was accepted by the ACCC– this introduced significant new price and non-price commitments and widened the scope of the SAU to cover wholesale Layer 2 services provided over each of nbn’s networks.

The SAU has a modular structure, with different commitments applying over the period to 30 June 2040.

## What does this mean for you?

It's everyone's responsibility to identify and manage risks and report activities that could compromise our position as a trusted business. It is not just the job of our Legal & Regulatory, Enterprise Compliance, or Enterprise Risk functions.

You must complete any mandatory training you're asked to do, so that you're able to identify these issues and know when to ask for assistance from nbn subject matter experts.

You are individually responsible for the accuracy and accessibility of what you put in any communications for the public, including to make sure you don't exaggerate the performance of our services or make any statements that could be misinterpreted.

If you are not sure what to do, or how nbn's statutory and regulatory obligations apply to your situation, consult with **nbn** Legal & Regulatory.

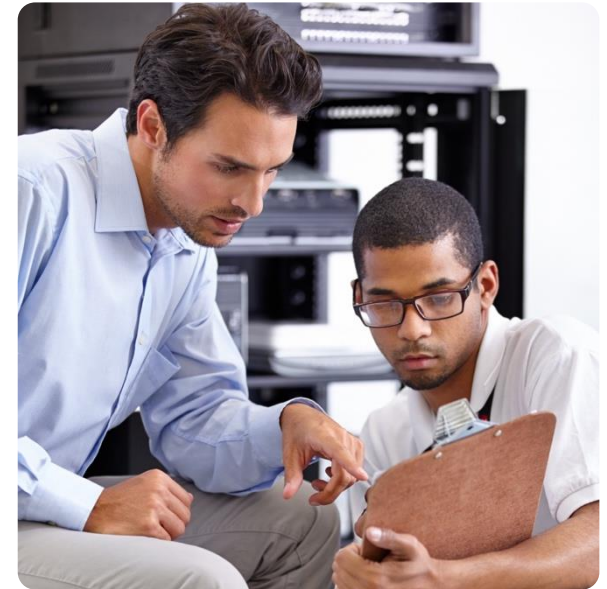
## Always

- Follow processes that have been set up to help nbn comply (and demonstrate it complies) with its obligations, including requirements in the SAU for setting or changing prices (inclusive of discounts/rebates), introducing products, and withdrawing products.
- Design proposals, initiatives, and requests concerning our telecommunications services and related activities in ways that provide equality of opportunity to our retail service provider customers. Contact Legal & Regulatory immediately if you are considering activities that might give an actual or perceived advantage, or disadvantage, to one or more service providers.

- Verify with the relevant subject-matter expert the factual accuracy of all communications intended to be published externally or sent to the public, including making sure you have strong evidence for every claim you make.
- Provide enough time for external communications to be reviewed in accordance with nbn's internal company communications review requirements.

## Never

- Provide one or some service providers with information about existing or new products or services (including trials and proofs of concept), whether directly or indirectly, without telling all other acquirers of our telecommunications services and related activities at the same time.
- Agree terms of supply with one or more of our service provider customers without going through approved **nbn** processes (which generally includes publishing standard terms on our website before contracts are agreed).
- Design a product that nbn is prevented from selling, such as providing communications services directly to consumers or to businesses that are not telecommunications or content service providers, or supplying broadcasting or other kinds of content.
- Say that communications you've drafted are factually accurate if you are not able to provide evidence for every claim you make.
- Ignore rules relating to access to customer premises on non-nbn telecommunications infrastructure.



# SPEAKING UP

If you see something at nbn or when interacting with our business partners that does not align with this Code or with nbn’s other policies, it is your responsibility to speak up.

Some questions to consider if you are not sure include:

- Does it align to nbn’s values?
- Could someone be harmed (physically or psychologically) or otherwise put in danger?
- Does it conflict with laws, regulations, or other requirements on nbn?
- Could it harm nbn’s reputation?

You are encouraged to raise issues first with your manager. However, as that may not always be possible, there are other channels you may use, including:

- Speaking to another people leader in your broader team
- Raising a People Central case
- Contacting the Fraud Management & Investigations Team
- Contacting Legal & Regulatory
- Making a disclosure through nbn’s whistleblower channel (see nbn’s [Whistleblower Policy](#))

Depending on the subject and nature of your concern, some channels may be more appropriate than others, and you might need to be guided to a different channel than the one you first identified.



**nbn** encourages everyone to be an active bystander, to support nbn colleagues who may have been subjected to unacceptable behaviour – where they are comfortable in doing so. A “bystander” is a person who has witnessed or subsequently learned about potentially unacceptable behaviour at **nbn**. Support can include:

- “calling out” unacceptable behaviour when it is seen in the workplace;
- spotting offending behaviour and asking the person if they are okay;

- supporting the person by providing them with information about this Code of Conduct and avenues for raising their concerns; and
- reporting the conduct in line with nbn policies and procedures.

Bystanders are protected by the victimisation provisions of this Code of Conduct.

# WE CARE

Uphold the safety and wellbeing of each other and ourselves.

Lead with purpose, do the best for our communities.

Be curious, there's always something to learn so together we can grow.



# ENSURING PEOPLE ARE SAFE

nbn is committed to providing and maintaining a safe, healthy, inclusive, and respectful workplace that protects physical and psychological health, safety, and wellbeing.

We are dedicated to making sure that everyone who works for, or on behalf of, nbn goes home safely at the end of the day. As an employer, we are accountable for establishing, monitoring, and improving the way we work where needed, providing safe equipment and ensuring our people are trained and competent to carry out our work. Our aim is to ensure we meet or exceed the minimum standards set out in the relevant legislation for our industry and locations.

## What does this mean for you?

You are responsible for taking reasonable care of your own safety and wellbeing and ensuring that nothing you do (or fail to do) adversely affects the safety and wellbeing of other people at work.

You are also responsible for preventing and reporting both physical and mental health related workplace injuries, illnesses, hazards, near misses, unhealthy conditions, and actual events in line with nbn's safety requirements and procedures.

## Always

- Comply with and follow relevant health, security and safety requirements and procedures, use all personal protective equipment provided in an appropriate

manner, and help others who work with you to do the same.

- Stop work that appears unsafe or doesn't meet nbn's safety processes and discuss with your leader.
- Undertake any required safety-related training and maintain relevant accreditations.
- Actively participate in rehabilitation and return to work processes if ill or injured in the course of work.

## Never

- Take part in any activity or work that might be dangerous to yourself or others, or where you are not trained to complete the tasks safely.
- Ignore or fail to respond to a work health and safety issue that has come to your attention (whether you've identified it yourself, or it's been brought to your attention by someone else).
- Engage in field work if you are under the influence of any drugs or alcohol—you must have a blood alcohol of no more than 0.00 if you are engaged in field work, including driving a nbn fleet vehicle.

## For more information

- [Safety & Wellbeing Policy](#)
- [Diverse, Respectful & Inclusive Workplace Policy](#)

nbn is committed to being an accessible and inclusive employer and customer-led service delivery organisation.

We work to provide all people with a safe, respectful, and inclusive experience and independence when they interact with us. We are committed to equality of opportunity in all aspects of our operations both internally and in our interactions with all customers, including to ensure compliance with the *Disability Discrimination Act 1992* (Cth).

As an organisation, nbn:

- Ensures that everyone, regardless of their race, sexual orientation, disability, or other characteristic, is treated equitably, including in all interactions with customers and during all stages of the recruitment process for people joining our workforce;
- Takes steps to ensure that everyone, particularly persons with disabilities, is able to carry out their duties and interactions with us, including providing reasonable workplace adjustments;
- Takes reasonable precautions to prevent and eliminate discrimination in nbn workplaces and in our interactions with customers; and
- Strongly supports the advancement of First Nations people, women, and people with disabilities within the nbn workforce.

# PROTECTING THE ENVIRONMENT

**nbn believes that being environmentally responsible is an integral part of being a sustainable business**

We are committed to helping to protect and restore the natural environment and places of cultural or heritage value (including those related to First Nations communities), as well as reducing our carbon emissions, waste, and other environmental impacts and dependencies.

We also aim to help our industry partners and customers address their own environmental challenges by leveraging the digital connectivity of our network.

## What does this mean for you?

You are responsible for following the management systems and procedures we have developed to protect our environment and cultural heritage.

### Always

- Integrate sustainability considerations into decision-making, including to use natural resources responsibly, avoid impacts to the environment wherever possible, reduce energy and water consumption, and engage in recycling and reusing resources.
- Undertake any required environment or cultural heritage related training.

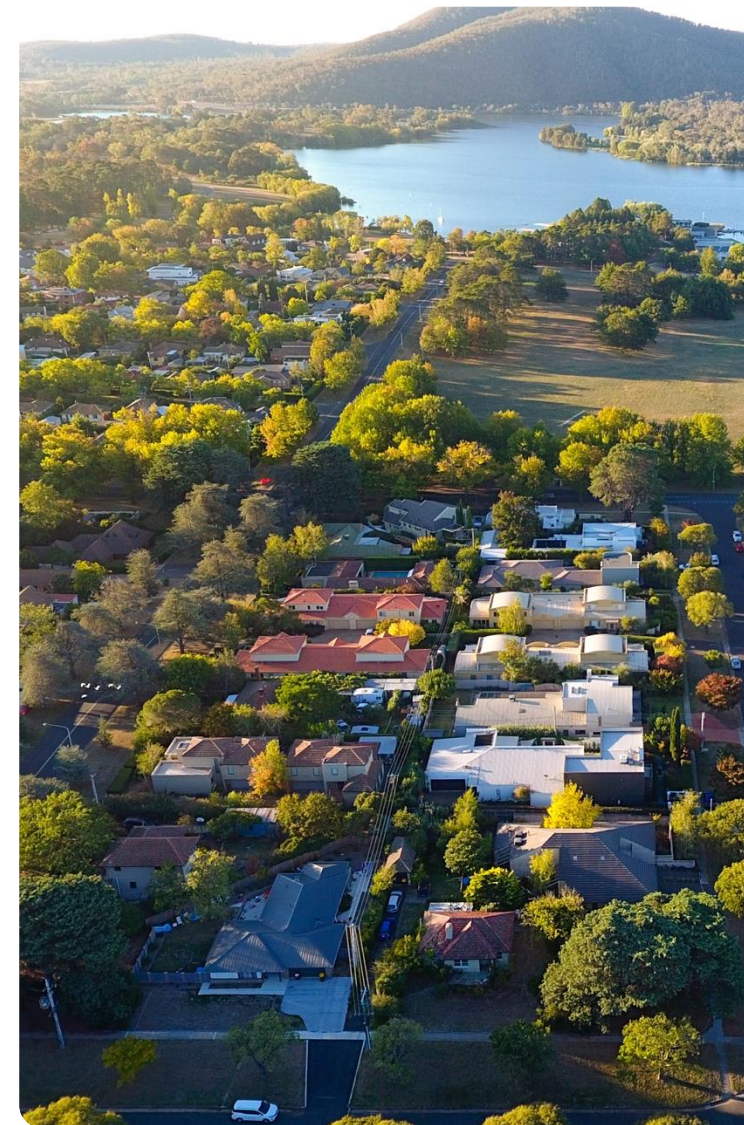
- Stop any work that may cause or contribute to an environmental or cultural heritage impact and discuss with your leader.
- Report any environmental concerns or incidents immediately to your leader.
- Refer suppliers to their obligations under the [nbn Supplier Code of Conduct](#), including with respect to the environment and cultural heritage.

### Never

- Carry out work that does not follow nbn operating procedures and processes designed to protect the environment and cultural heritage.

### For more information

- [nbn Supplier Code of Conduct](#)
- [nbn Sustainability Reports](#)
- [Environment Policy](#)



# PREVENTING MODERN SLAVERY

**At nbn, we conduct our business with the highest standards of ethical and social responsibility to protect the rights and wellbeing of individuals**

We are committed to respecting the rights of people across our operations and supply chain, through to our products and services, by focusing on reducing direct and indirect modern slavery risks.

## What does this mean for you?

You are responsible for understanding and following the procedures that relate to sourcing and suppliers to ensure we minimise the direct and indirect risks of modern slavery.

If you are involved in supplier or supply chain decisions, you must conduct the required assurance activities and procedural checks to ensure nbn standards are being met. Speak up if you notice something that isn't right.

## Always

- Conduct nbn's required assurance activities and procedural checks to ensure nbn standards are being met if you are involved in supplier or supply chain decisions.

## Never

- Engage a supplier or agree to supply chain changes unless you are authorised to do so and have followed the appropriate processes and procedures.







# WE ARE FEARLESS

Listen, really listen, invite feedback, and ask “why” to genuinely understand.

Speak up, knowing it’s safe and expected to call things out, share bold ideas.

Trust and empower each other to make decisions and get thing done.

# RISK MANAGEMENT AND SECURITY

## nbn takes risk management and security very seriously

There are high expectations of how nbn manages both risk and security.

As the owner and operator of critical infrastructure, nbn plays an important role in ensuring that Australians stay connected. A reliable, secure, and resilient network is fundamental to the social and economic wellbeing of the nation and each of us has a role in ensuring success.

Understanding the risk environment in which we operate, including security risks, and effective risk management is fundamental to keeping the trust of the public, regulators, and the Australian Government.

Through every decision and activity, we aim to achieve our objectives, while protecting our people, network, business operations, and reputation. We achieve this through a risk-based approach centring on the proactive identification, assessment, and management of risks.

We are always considering a broad range of possible hazards, threats, and risks. These include the effects of climate change on our infrastructure, potential cyber attacks against our network or systems, and threats to our supply chain. Threats can come from internal or external sources. Everyone at nbn must be alert to things that do not seem right and take positive action so we safeguard what matters most.

We require the same standards of our suppliers and third-party providers by requiring them to comply with the nbn

Supplier Code of Conduct, by building into our contracts with them requirements for managing risks, security and business resilience capabilities necessary to maintain the continuity of goods and services being provided to nbn.

## What does this mean for you?

You are responsible for identifying and managing the risks associated with your business activities, and ensuring you have the right controls in place to mitigate negative consequences should an issue or disruption occur.

When managing risks and preparing for disruptions, consider the potential impact on all stakeholders, including other nbn business units, employees, customers, suppliers, government stakeholders, and the broader Australian public.

Everyone must be vigilant in maintaining the security of our premises and nbn devices, and report potential security breaches to Security Central immediately.

If you have a criminal record, you must disclose it to your manager in writing, whether it occurred before or after you commenced employment or engagement with nbn. If you misrepresent or conceal facts relating to any criminal record, you may be subject to disciplinary action, up to and including the termination of your employment (if you are an employee) or engagement (if you are a contractor).

You must also immediately notify your manager if you are arrested and/or charged with any criminal offence during your employment or engagement with nbn. A failure to do so may also result in disciplinary action up to and including termination of your employment (if you are an employee) or engagement (if you are a contractor).

## Always

- Take responsibility for understanding, assessing, and managing risks to your day-to-day business activities.
- Keep information secure in line with nbn procedures.

## Never

- Treat risk management, security, or business continuity as a low priority activity.
- Ignore, conceal, or avoid reporting potential threats or risks that may harm nbn's people, network, or business operations.
- Consider risks, incidents, or disruptions in isolation (at individual, team, project, or activity level).
- Conceal or fail to disclose your criminal record to nbn.
- Fail to report any identified or suspected security breaches.

# ETHICAL BEHAVIOUR

## At nbn, we are committed to acting with integrity

Where someone has an actual, potential, or perceived conflict with the interests of nbn, or behaves fraudulently in the course of their employment, it can cause losses or other damage, including to nbn's reputation.

There is no tolerance for any of these behaviours at nbn.

## What does this mean for you?

You must report immediately any situations that could give rise to an actual, potential, or perceived conflict of interest, even if you personally think the behaviour is acceptable. Once reported, the Conflicts team will assess whether a conflict exists and how it needs to be managed.

You must always disclose when you:

- have a personal interest in a supplier, retail service provider, or other third party, including where nbn is considering entering into an agreement with them;
- have or are considering secondary employment outside nbn (whether paid or unpaid); and/or
- have a close personal relationship with someone at nbn or someone who works closely with nbn.

You must always seek approval for the following types of gifts or benefits before accepting them:

- Gifts valued at \$200 or greater; or

- Individual gifts that together are valued at \$200 or greater, received during a three-month period.

You must not engage in fraudulent or corrupt behaviour including insider trading, which arises when someone uses non-public information to benefit from investments and other commercial relationships.

## Always

- Be prepared to act promptly to avoid, remove, or mitigate a conflict of interest.
- Follow nbn's rules when offered a gift or benefit from a third party, including seeking approval for reportable gifts or benefits before you accept them.
- Follow the rules for the limited circumstances in which it's permissible to give gifts.
- Raise genuine concerns regarding suspected instances of fraud or corruption.

## Never

- Make your own determination about whether a conflict exists—whether for you or someone else.
- Accept a gift or benefit from parties in a negotiation or tender during the negotiation or tender process.
- Accept monetary or financial gifts (including gift certificates or vouchers) from nbn's suppliers or other third parties.

- Look the other way if you think you suspect fraudulent or corrupt behaviour.

- Engage in insider trading.

## How to report suspected cases of fraud or corruption

If you know of or genuinely suspect behaviour that may involve fraud or corruption, you must report it immediately, providing as much information as possible.

We recommend that you raise any concerns in the first instance with your manager or the Fraud Management & Investigations Team.

If you seek to have your disclosure protected under whistleblower laws, you can make your report in accordance with nbn's [Whistleblower Policy](#).



## For more information

(including rules for disclosing conflicts and gifts)

- [Conflicts of Interest \(Employees & Contractors\) Policy](#)
- [Fraud & Corruption Control Policy](#)
- [Gifts or Benefits Policy](#)

# WE ARE ONE TEAM

Respect each other, we create an inclusive environment.

Put team above yourself, recognise one another's contribution to create an even greater outcome.

Better together, share ideas and resources across nbn, partner effectively with industry.



# BUILDING AN INCLUSIVE WORKPLACE

At nbn, we recognise that when people work together effectively, they can deliver extraordinary results.

We are focused on fostering an environment in which our people, customers, and those we work with feel valued, respected, and safe.

## What does this mean for you?

Everyone at nbn has a responsibility to treat each other fairly and respectfully.

People leaders are accountable for lifting the performance of their teams and delivering the nbn strategy. That means that reasonable management actions that are respectful, constructive, and conducted in a lawful and reasonable manner are not examples of bullying or harassment.

For individuals, there is no place at nbn for harassment, sexual harassment, bullying, violence, racism, any form of unlawful discrimination or vilification, or other disrespectful behaviours.

This commitment includes nbn's positive duty under the *Sex Discrimination Act 1984* (Cth) to take reasonable and proportionate measures to eliminate sex discrimination, sexual harassment, sex-based harassment, conduct creating a hostile workplace environment on the ground of sex, and related acts of victimisation, as far as possible.

You are individually responsible for understanding and demonstrating the standards of behaviour expected of you.

You are expected at all times to:

- Be respectful, professional, and honest in your interactions with others.
- Listen with curiosity and openness when someone speaks to you about something you've said or done.
- Speak up if you hear or experience disrespectful behaviour or unfair treatment and support other colleagues in speaking up.
- Make employment-related decisions based on skills, qualifications, and capabilities, not on personal attributes unrelated to job requirements.
- Promote inclusive practices and behaviours when interacting with suppliers, customers, and the community.
- Support the accessibility needs of your colleagues.



nbn has no tolerance for any of these behaviours, by any of its people or anyone doing business with nbn. These standards apply not just in nbn workplaces, but in any place where work for nbn takes place, or where a connection with nbn work exists, from nbn facilities to end user premises, private premises, and events, as well as to online activity (whether within or outside of nbn's corporate network).

## ● Harassment

Harassment is any unwanted and unwelcome behaviour that makes a person feel offended, humiliated and/or intimidated where a reasonable person would anticipate that reaction in the circumstances. Harassment can be verbal, non-verbal, written, or physical, and can occur online or in person. Even a one-off incident may constitute harassment.

## ● Bullying

Bullying is repeated behaviour directed towards a person or groups of people at work that may be seen as unreasonable and includes victimisation, humiliation, intimidation and/or threatening behaviour, that creates a risk to health and safety. It can be physical, verbal, or psychological.

## ● Hostile workplace environment based on sex

A hostile workplace environment arises when an individual's conduct in the workplace could be seen by a reasonable person as offensive, intimidating, or humiliating considering the overall context, impacts another individual, due to their sex or characteristics that pertain or is imputed generally to their sex. It is unlawful for a person to create this environment and these actions are prohibited at nbn.

## ● Sexual Harassment

Sexual harassment is any unwelcome sexual conduct where a reasonable person would anticipate the possibility that the person harassed would be offended, humiliated, or intimidated having regard to all the circumstances. Sexual harassment includes unwelcome touching, comments, or invitations for romantic or sexual encounters. It also includes displaying sexually explicit images, making sexually suggestive comments, or inappropriate looks and staring. Sexual harassment may occur online, in person, or via other digital means, and may happen regardless of a person's sex or gender identity.

## ● Vilification

Vilification is when a person commits a public act that is reasonably likely to offend, insult, humiliate, or intimidate the people against whom it is directed, and is done because of the race, colour, or national or ethnic origin of the group against whom it is directed.

## ● Victimisation

Victimisation occurs when a person subjects (or threatens to subject) another person to a detriment because they: propose to, have, or are believed to have made a complaint or an allegation; have given evidence or information in connection with a complaint or allegation; or acted as a bystander.

## ● Harassment based on identity

Any unwelcome conduct of a demeaning nature (eg, derogatory comments, slurs, or conduct that offends, insults, humiliates, or intimidates a person or group of people) by reason of their actual or perceived race, culture, ethnic background, nationality, religion, disability, sexual orientation, gender identity, or sex. Harassment can happen in one or multiple incidents and may affect the target of the conduct as well as other colleagues or onlookers.

## ● Discrimination

Both direct and indirect discrimination are prohibited at **nbn**.

Direct discrimination is any unlawful behaviour that occurs when someone is treated less favourably than another person or group because of their identity, including due to gender (or gender identity or expression), physical, mental, or intellectual abilities, race, ethnicity, age, sexual orientation, intersex status, relationship status, family or carer's responsibilities, pregnancy, breastfeeding, culture and identity, religious or political beliefs, nationality, or social origin.

At nbn we also seek to ensure employees are free from discrimination or harassment for their choice to join (or not join) a union or employee representative organisation.

Indirect discrimination may occur when there is an unreasonable rule or policy that applies to everyone equally but has a negative impact on some people more than others because of their protected personal characteristic.

## At nbn, we are committed to recognising and honouring First Nations Peoples and their communities

At nbn, we are committed to recognising and honouring First Nations Peoples and their communities.

Our vision for reconciliation involves a deep connection with First Nations cultures and their aspirations for digital inclusion, as reflected in nbn's Reconciliation Action Plan.

We value the diversity and contributions of our First Nations employees, customers, partners, and stakeholders.

nbn aims to play a significant role in enhancing digital skills in partnership with First Nations, addressing social and economic disparities through improved broadband access. We are dedicated to building cultural competency across the organisation creating culturally safe spaces for all employees, fostering two-way learning, formal education, and collaboration with First Nations.

At nbn we understand that our role goes beyond connectivity, and that it includes supporting culturally sensitive technology usage, creating job opportunities for First Nations, and amplifying the success of community-led programs.

As an organisation, nbn respects and supports:

- The customs and cultures of First Nations People;
- Digital inclusion efforts in partnership with First Nations People;
- Reconciliation and cultural understanding in the workplace;
- Procurement and spending opportunities with First Nations business and suppliers; and
- An Acknowledgement or Welcome to Country at large events/meetings.



**For more information**

**First Nations Pillar  
& Reconciliation  
Action Plan**



# WE DELIVER

Start by asking, “would this make a positive difference for our customers?”

Set high expectations, accept accountability, and honour our commitments.

Strive and adapt, by being innovative and always finding solutions to achieve excellence.



# QUALITY IS AT THE CORE OF NBN

At nbn, quality is a responsibility shared by all of the people who work at or do work for nbn.

nbn is committed to design, build, connect, and assure a quality, fast, reliable, and fit-for-purpose network that makes a positive contribution to Australia.

We achieve quality outcomes by applying a customer-focus to everything we do, including by optimising processes and continuously improving what and how we meet those needs. We also achieve this goal through teamwork and leadership, taking accountability for outcomes, and demonstrating a positive quality culture by driving outcomes that align to industry best practice.

## What does this mean for you?

You are individually responsible for performing your work to a high standard of quality to ensure an outstanding customer experience.

You are required to drive quality outcomes in whatever you do, from building the network and designing products to optimising internal procedures and processes and saying something if you see practices that do not deliver to industry best practice standards.

## Always

- Take operational accountability in framing and driving quality outcomes.
- Ensure you are familiar with and comply with elements of the Quality Management System that are relevant to your role.
- If you are a manager, provide training and coaching to strengthen individual competences, recognise individuals who demonstrate excellence, and ensure that sufficient resources are available to achieve quality outcomes.

## Never

- Sacrifice quality for speed of delivery.
- Waste resources by delivering an outcome that has only a short-term viability, instead of a higher-quality approach that will have longer term value.
- Accept work that is not compliant to nbn, legal, or regulatory requirements, obligations, and expectations.

## For more information

- [Safety & Wellbeing Policy](#)





# THANK YOU

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