

# Corporate Social Responsibility Policy

Energy On – Simplifying Utilities

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# Corporate Social Responsibility Policy

Energy On delivers ethical, generous, reliable, and innovative solutions to clients with transparent solutions that benefit all stakeholders. It was this focus that led to the establishment of our business and it is this focus that drives our approach to Corporate Social Responsibility.

## Our Company History

Energy On was founded by Clive Pearce in 2010 and is wholly Australian owned and operated. After many years working in Energy Consulting and following the de-regulation of the energy industry in Victoria, Clive identified the emergence of private electricity networks, better known as Embedded Networks.

Designed for use in multi-tenant sites such as apartment buildings, shopping centres, office buildings, industrial estates and retirement homes, an embedded network allows the owner or manager of the site to purchase electricity at wholesale and then on-sell it to the Occupiers at a competitive retail rate.

Energy On aims to always maintain the upmost levels of service for our customers and strives to place itself at the forefront of the embedded network industry by ensuring wherever possible that the benefit derived from the sites we manage accrues to the owner of that network, not to the service provider.

## Our Vision, Values and Culture

### Vision

Australia's most ethical and reliable provider of Retail, Network and Energy services for Embedded Networks and Microgrids.

### Values

**Ethical**  
**Generous**  
**Reliable**  
**Innovative**

### Culture

Our culture and values are rooted in service integrity and in taking personal responsibility for our actions, our outcomes, and our reputation.

Details of specific policies can be found on our website and in several internal policies. We are individually and collectively accountable for upholding our Corporate Social Responsibility commitments. We encourage participation across our organisation, and we will work with external stakeholders to continually advocate on behalf of the workforce, improve our workplaces, contribute to the communities we serve, and ensure our actions are socially, ethically, and environmentally responsible.

The core of our commitment to Corporate Social Responsibility is based around 4 key areas:

### **Employees & People**

We take seriously our responsibilities to protect, support, and prepare our team members for successful careers, and to advocate on their behalf. Our efforts are focused on providing career opportunities and resources workforce and leading by example in areas such as workplace safety,

health and wellness, diversity and inclusion, and training and development. We believe in opportunity for all and are steadfast in our commitment to equal employment opportunity and the protection of human rights.

### **Ethics**

Energy On is committed to doing the right thing, conducting ourselves in a legal, ethical, and trustworthy manner, upholding our regulatory obligations, and complying with both the letter and spirit of our business policies.

### **Engagement**

Energy On understands that it takes all of us working together to truly have an impact. As such, we aim to partner with organisations in the communities where we live and work to improve lives and society as a whole – by engaging in activities such as community service and philanthropy. We also seek to engage with workforce suppliers who operate using socially responsible business practices and adhere to the professional standards that Energy On holds itself to.

### **Environment**

Energy On recognises a shared responsibility to protect our planet. Although our facilities and operations have a small ecological footprint, we reduce the environmental impact of our business through preservation, conservation, and waste reduction practices. We actively support the introduction of renewable solutions to our client networks through microgrids and developing Green Power options and individually make personal contributions in this area. For more information refer to the Energy On Environmental Policy.

Underlying our Corporate Social Responsibility is a set of core policies that outline our approach and guide our activities.

## **Code of Conduct**

Energy On's Code of Conduct, as outlined in the Energy On HR Policy, provides mechanisms to prevent dishonest or unethical conduct and fosters a culture of honesty and accountability. This code outlines the responsibilities of our employees, including ensuring that our suppliers are aware of their obligation to conduct themselves in a legal and ethical way.

Our Code of Conduct applies to all employees and provides the framework of principles for conducting business, dealing with other employees, clients and suppliers. The Code of Conduct does not replace legislation and if any part of it is in conflict, then legislation takes precedence.

This policy is based on the following:

- Act and maintain a high standard of integrity and professionalism
- Be responsible and scrupulous in the proper use of Company information, funds, equipment and facilities
- Be considerate and respectful of the environment and others
- Exercise fairness, equality, courtesy, consideration and sensitivity in dealing with other employees, clients and suppliers
- Avoid apparent conflict of interests, promptly disclosing to an Energy On senior manager, any interest which may constitute a conflict of interest
- Promote the interests of Energy On

- Perform duties with skill, honesty, care and diligence
- Abide by policies, procedures and lawful directions that relate to your employment with Energy On and/or our Clients
- Avoid the perception that any business transaction may be influenced by offering or accepting gifts
- Under no circumstances may employees offer or accept money
- Any employee, who in good faith, raises a complaint or discloses an alleged breach of the Code, whilst following correct reporting procedures, will not be disadvantaged or prejudiced. All reports will be dealt with in a timely and confidential manner.

## Sustainable Procurement Policy

Energy On supports sustainable procurement by looking beyond the up-front cost to make purchasing decisions based on the entire life cycle of the goods and services, taking into account associated costs, environmental and social risks and benefits, and broader social and environmental implications. Energy On utilises resources for their maximum lifecycle to prevent unnecessary waste. In doing so, Energy On engages in procurement processes that have positive environmental, social and economic impacts possible across the entire life cycle of goods and services.

## Human Rights Policy

Energy On support the Commitment to Human Rights and Australia’s steps to advancing human rights globally. Energy On’s code prohibits discrimination or harassment on the basis of the following grounds, and any combination of an individual’s race, colour, sex, age, creed/religion, national origin, genetics, sexual orientation, gender identity/expression, disability, family status (i.e. parent-child relationship), marital status and/or other protected categories under applicable laws.

### Equal Employment Opportunity

Energy On is protects the employment rights of qualified applicants and employees regardless of differences and protected categories listed above. We are also committed to taking affirmative action to employ and advance women, minorities and disabled individuals.

### Diversity

We are a diversity-friendly and inclusive workplace, Energy On value and respect the unique contributions of people with diverse backgrounds, experiences and perspectives. Energy On fosters a culture that allows team members to feel included and encouraged to bring their whole selves to work. We believe this enables diversity to flourish, creating better experiences for our team, clients, customers, and improved business performance. Energy On aims to promote diversity in our workplace though our recruitment process by ensuring that all candidates are encouraged to apply.

### Accommodations Policy

It is the policy of Energy On to comply with all applicable laws concerning the employment of persons with disabilities. Consistent with that commitment, it is Energy On’s policy not to discriminate against qualified individuals with disabilities regarding application procedures, hiring, advancement, compensation, training, or other terms, conditions, and privileges of employment.

### Anti-Harassment, Anti-Discrimination and Anti-Bullying

Energy On is committed to maintaining a work environment that is free from harassment, bullying, unlawful discrimination and where employees and others in the workplace are treated fairly and with respect. As such, Energy On will not tolerate harassment of, or by, its employees. For more information on Energy On’s

Anti Bullying Policy and related procedures please refer to the Human Resources Policy.

## Whistle-Blowing Policy

Energy On values and encourages whistle-blowing as it enables potential issues to be identified and escalated that may not otherwise be uncovered.

Any Energy On stakeholders (including current or former employees, contractors, suppliers, associates, trustees and relatives or dependants of the aforementioned) who has reasonable grounds for concern regarding apparent wrongdoing by Energy On, including a director or an employee, or an associated company, such as a contractor or supplier, acting on behalf of Energy On, is required to disclose the activity. These activities may include:

- Committing a criminal offence;
- Failing to comply with a legal obligation, including potential violations of laws or regulations
- Tax-related misconduct;
- Unauthorised disclosure, insider trading or other misuse of confidential information;
- Breaches of company policy or Codes of Conduct;
- Inaccuracies in statements provided to auditors;
- Fraud, negligence, default, breach of trust or duty;
- Endangering the health and safety of an individual or public;
- Environmental damage;
- A breach of the protection described in this policy; or
- Concealing any information relating to the above.

Disclosure is to be first made internally to Energy On senior management team, directors, the company secretary or internal auditor who will treat the matter with complete confidence. Energy On will investigate the matter.

If the individual raising their concern is not satisfied with the company's response, they are to report the matter with an external audit team conducting audits on Energy On, the ASIC (Australian Securities and Investments Commission) or APRA (Australian Prudential Regulation Authority).

The employee will not suffer any detriment as a result of any genuine attempt to bring to light matters of concern.

## Modern Slavery Statement

Energy On is committed to the prohibition of trading with suppliers that engage in Modern Slavery, which include the following practices:

- Deducting from employee wages the amount of "debts" to their employers, such as the cost of transport, accommodation, or meals;
- Misleading workers as to work conditions, their minimum wage, and workplace rights; or
- Trading with other suppliers that may engage in the above practices.

## Anti-Bribery and Corruption Policy

Bribery and corruption undermine legitimate business activities, distorts competition and exposes Energy On and its employees to risks. Energy On is committed to abiding by or exceeding all relevant laws and regulations to prevent bribery throughout our business operations.

Energy On interprets the term ‘corruption’ to include the misuse of power for private gain. Bribery is interpreted to include the illicit offering or acceptance of something to procure services including performing or abstaining from any Company duties; or that may be construed or used by others to allege favouritism, discrimination, collusion or similarly unacceptable practices. Items that may be considered bribes include cash, cash equivalents, loans, hospitality, entertainment, commissions, benefits in kind or other advantages.

Energy On prohibits paying, offering, asking for, proposing terms for, or accepting, bribes or assistance of any organisation or individual. This includes the prohibition of discussing terms with those who offer bribes. The policy extends to the prohibition of using agents, partners, contractors, family members or others acting on someone’s behalf to offer bribes or engage in corrupt business practices.

Energy On’s prohibits its employees from engaging in any form of corrupt business practice, whether for the benefit of Energy On, the individual employee or another party.

Any Energy On employee who is offered a bribe must immediately report it to their manager.

### Gifts

The policy requires us to exercise good judgement and practice moderation in giving and receiving business gifts, such as traditional gifts of nominal value during festive seasons. Energy On must decline any gifts or other benefits (i.e. personal favours or preferential treatment) that in any way could influence or appear to influence business decisions.

Any gifts received of a value at or greater than \$50 are to be declared to management for transparency.

## Document History

Version	Date	Author	Comment
1.0	July 2017	A. McMeekin	Policy created.
1.1	March 2019	C. Pearce	Review and formatting update.
2.0	June 2020	C. Pearce	Major update, inclusion of Sustainable Procurement Policy, Human Rights Policy, Whistle Blowing Policy, Modern Slavery Statement and Anti-Bribery and Corruption Policy.
2.1	February 2021	C. Pearce	Inclusion of Diversity Policy and formatting update.