



OUR CODE OF CONDUCT



 May 2026



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CEO MESSAGE

nbn's purpose is to elevate Australia by connecting people and powering progress

nbn was established by the Commonwealth of Australia as a Government Business Enterprise to build, operate, and evolve the critical infrastructure that underpins the digital economy and expands access to digital opportunity. The revised Statement of Expectations, laid out by the Federal Government in December 2022, states that nbn exists to provide fast, reliable, and affordable connectivity to enable Australia to seize the economic opportunities before it and service the best interests of consumers.

Intrinsic to this mission is our purpose to elevate Australia by connecting people and powering progress delivered through our nbn 2030 strategy, the pillars that support the strategy and define our priorities, and the mindsets that guide how we work: Work as One, Move at Speed; Focus on What Matters; Simplify, Simplify, Simplify; Embrace Innovation; Be Humble.

This Code details that connection. It sets out nbn's commitment to our customers, community, and country, 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, ensure you comply with it, and act with integrity.

If you are reading this Code as a member of the broader Australian community, we want you to know that your trust and support is deeply valued. Every service we provide is driven by our commitment to enable you to do great things. Your trust is the foundation of our existence, and we are dedicated to continually earning it through our actions and behaviours. We are here to serve you, and together, we can achieve remarkable things for our community and country.

Ellie Sweeney
Chief Executive Officer

OUR CODE AND YOU

nbn is dedicated to upholding the highest standards of professionalism, honesty, integrity, and fairness. We are committed to providing a safe, respectful, and inclusive workplace, expecting everyone to treat each other with dignity and courtesy. This fosters a safe work environment, boosts productivity, and enhances fulfillment.

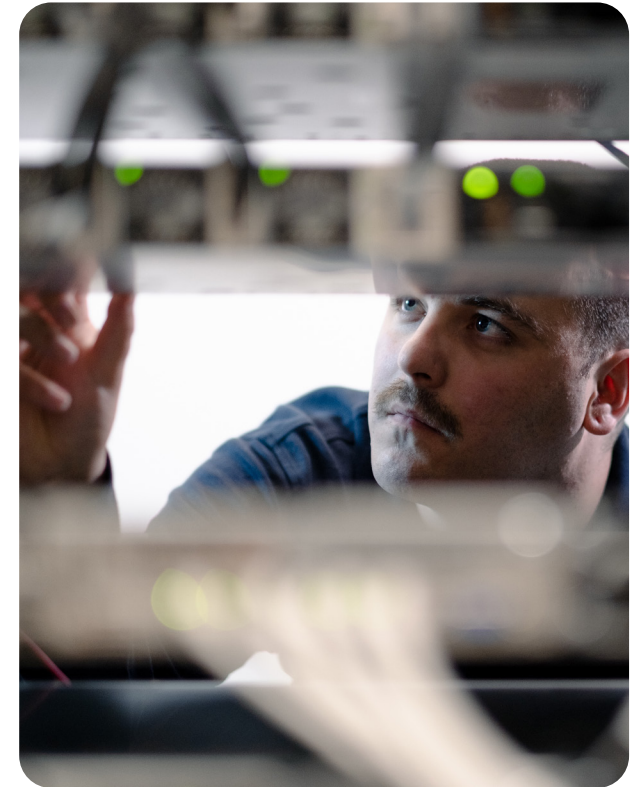
Everyone shares the responsibility of ensuring safety and inclusivity, proactively eliminating unlawful and harmful behaviours. This includes interactions with colleagues, customers, and the public, handling information responsibly, and protecting nbn's assets.



Understanding and adhering to this Code is crucial whenever you are representing nbn, including interactions during and after work hours, at work events, and on social media. Mandatory training on this Code, other corporate policies and any other training or requirements deemed mandatory by nbn, must be completed.

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 your engagement with nbn.

The Code is reviewed annually to ensure it remains accurate and aligned with nbn's priorities.



Scope of nbn's Code of Conduct

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



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 elevating Australia by connecting people and powering progress.

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 has 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 we are 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 our 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 to enhance Australia's digital capability and productivity, promote digital inclusion and support equitable access to affordable and reliable broadband services, 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)

The SAU is a long-term undertaking until 2040, given voluntarily by nbn to the ACCC, which is legally binding and enforceable against nbn.

It provides a framework for regulating nbn's prices, allowing nbn's average prices to increase by CPI each year until the point where nbn is expected to recover its costs, and nbn's product development and withdrawal. The ACCC has powers under the SAU to set benchmark service standards which must be reflected in our contract with RSPs.

The SAU also provides a framework for regulating nbn's cost recovery (where the ACCC reviews our costs for prudence and efficiency and sets our permitted rate of return), while giving nbn an opportunity to meet its investment and financing objectives.

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.





For more information

nbn Special Access Undertaking

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:

- 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, as appropriate, 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 channels (see [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 upstander, 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 but does not intervene. An “upstander” takes proactive steps to support those who have been subjected to unacceptable behaviour.

Support can include:

- “Calling out” unacceptable behaviour when it is seen in the workplace;
- Identifying offending behaviour and checking in with the person affected;
- 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.

WORK AS ONE, MOVE AT SPEED.

Collaboration and agility are essential.
By working together swiftly, we can
achieve more than we ever could alone.



RISK MANAGEMENT, RESILIENCE AND SECURITY

nbn takes risk management, resilience and security very seriously.

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

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

Resilience at nbn means ensuring we can continue to deliver essential services in the face of disruption. As a government-owned operator of critical infrastructure, nbn has a responsibility to anticipate, withstand, respond to, and recover from events that could impact our people, network, business operations, or customers. This includes planning for disruptions such as natural hazards, cyber events, and supply chain issues.

Everyone at nbn is expected to understand and comply with their resilience obligations as defined in the nbn Enterprise Resilience Policy, and to consider resilience in the decisions they make and the work they do including identifying critical dependencies, following approved continuity and recovery arrangements, participating in preparedness activities where required, and escalating issues that could compromise service continuity or recovery. Resilience is not

assumed; it is deliberately built and maintained to protect customer outcomes, community confidence, and trust in nbn.

Understanding the domestic and international environments in which we operate, including resilience risks, security risks, and effective risk management is fundamental to keeping the trust of the public, our security regulators, and shareholders.

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 in line with our Enterprise Risk Management Framework (ERMF) and regulatory obligations as a critical infrastructure provider.

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.



RISK MANAGEMENT, RESILIENCE AND SECURITY

What this means 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.

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 the termination of your employment (if you are an employee) or engagement (if you are a contractor).

Once notified, the manager must contact the Personnel Security team to discuss proposed next steps.

Always

- Take responsibility for understanding, identifying, assessing, and managing risks to your daily business activities.
- Complete required training by the due date.
- Use nbn's approved change-management process for every Network or IT change.
- Keep information secure in line with nbn procedures.
- Use only nbn-approved AI tools and platforms.

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.
- Ignore, conceal or fail to report identified or suspected risks, incidents or security breaches.

- Share your nbn credentials with anyone, this includes:
 - The use of clear text passwords or authentication/ access tokens in scripts.
 - Surrendering your individual access credentials and Multi-Factor Authentication code.
 - Publishing an application code containing nbn specific information (including access keys, passwords and hostnames) to public forums or repositories.
 - Using your nbn credentials for any other internal or external account – do not reuse your nbn password or passphrase.
- Upload, input or otherwise expose any nbn data (including prompts, documents, code, recordings or metadata) to unapproved AI platforms, websites or applications, including but not limited to AI meeting attendants and automation applications.
- Share confidential information outside nbn without appropriate approval as set out in the Information Classification Framework, which may include Security, Legal, Privacy or Commercial teams in addition to your manager, depending on the circumstances.

FOCUS ON WHAT MATTERS.

Prioritisation is key. By concentrating our efforts on the most impactful initiatives, we can drive significant progress.



ENSURING PEOPLE ARE SAFE

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

We are dedicated to ensuring everyone who works for nbn goes home safe and well at the end of the day by preventing physical and psychological harm arising from the way work is designed, managed, and conducted. As an employer, we are accountable for creating and maintaining safe ways of working, providing safe equipment, and ensuring our people are trained and competent to do their work safely. This includes identifying and managing physical and psychosocial hazards and risks. Our aim is to 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 yourself, the community, or other people at work. You are also responsible for preventing, speaking up, and reporting both physical and psychosocial related workplace injuries, illnesses, hazards, near misses, unhealthy conditions, and incidents in line with nbn's safety requirements and procedures.

Always

- Actively prevent harm by identifying, eliminating, and minimising psychosocial and physical risks arising from the way work is designed, managed, and conducted.
- 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 requirements and discuss with your leader.
- Speak up and report hazards or concerns that may cause physical or psychological harm.
- 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.
- Contribute to a psychosocially safe workplace by treating others with respect, raising concerns early, and using available support channels if you or someone else may be at risk of psychological or physical harm.

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).
- Undertake any work if you are under the influence of, or adversely affected by, drugs or alcohol. You must have a blood alcohol of no more than 0.00 when undertaking any work, including field work and when 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 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 sex, 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 reasonable steps to ensure 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 all forms of discrimination in nbn workplaces and in our interactions with customers; and
- Strongly supports the advancement of First Nations peoples, 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.

nbn is committed to helping to protect 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.

nbn is 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 supplier management to ensure we minimise the direct and indirect risks of modern slavery.

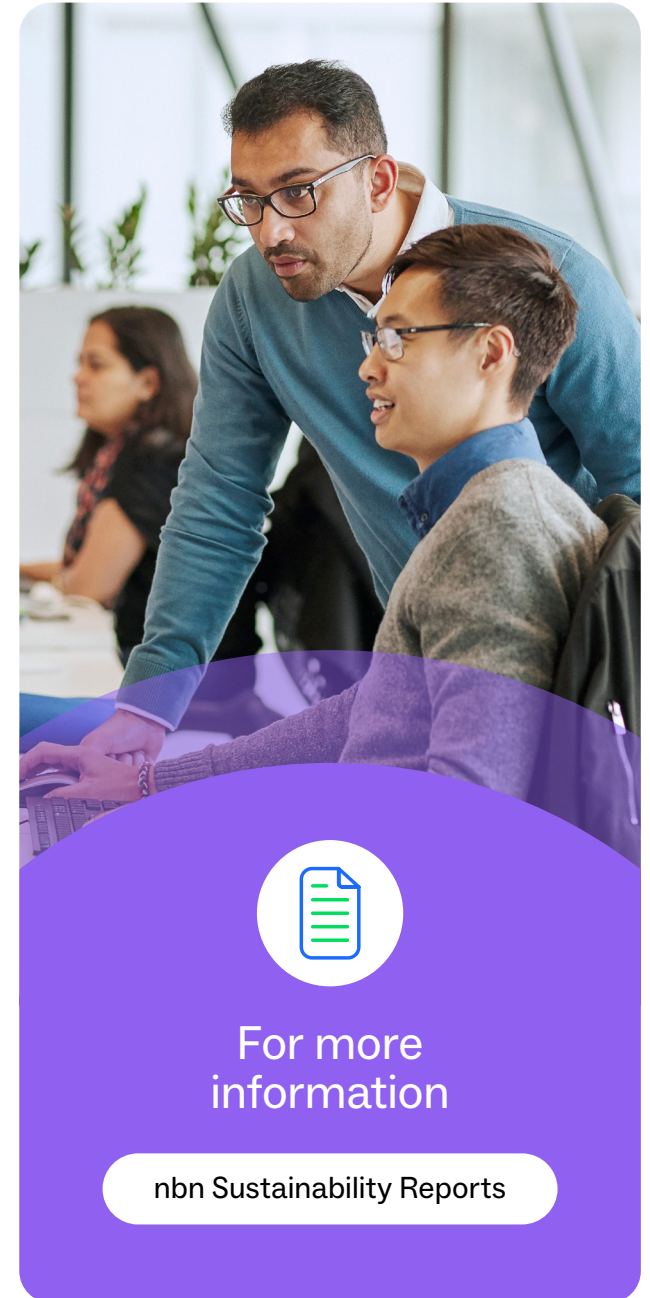
If you are involved in supplier or supply chain decisions, you must conduct the required assurance activities and procedural checks to ensure nbn standards are being met. Speak up if you notice something that isn't right.

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.



SIMPLIFY, SIMPLIFY, SIMPLIFY.

Complexity can be a barrier to success. By simplifying our processes and operations and eliminating unnecessary steps, we can enhance efficiency and the value we deliver to customers.



PROTECTING INFORMATION

Protecting information and intangible assets are central to fulfilling our purpose of lifting the digital capability of Australia.

Information and intangible assets are as important to nbn as the physical network over which we provide services. We handle a range of documents, communications, and ideas all the time, much of which is commercially sensitive.

Protecting information at nbn first involves ensuring that we classify and protect it appropriately. Classification categories help determine how systems, documents, and data should be accessed, secured, and stored to reduce potential risks, including of inadvertent disclosure. While we always need to treat commercial information with care, some types have special characteristics and rules for protection.

How we have designed, built, and manage the nbn network contains confidential information and intellectual property that needs to be kept confidential to protect nbn's ability to function effectively and efficiently.

Intellectual property may include innovations such as new products, processes, industrial designs, software, or other technology, as well as branding. nbn's intellectual property can support us in fulfilling our purpose and could have the potential for commercialisation. Where nbn has the right to use others' intellectual property, it is also important to protect it. nbn must not copy or use others' intellectual property where it does not have the right to do so.

What does this mean for you?

If you handle intellectual property – whether owned by nbn or licensed from third parties – assume it is confidential and cannot be disclosed to or otherwise shared with anyone else.

If you create intellectual property while working for nbn, it will belong to nbn. If you invent something, it might be protectable by a patent, so speak with your manager or Legal immediately about it and do not discuss or disclose it with anyone else, internally or externally.

Always

- If you create confidential information, take all reasonable steps to classify it appropriately and to make sure it remains secure, including only sharing it with people who really need to see it. If you need to share confidential information outside of nbn, you should have in place a non-disclosure agreement, or an agreement with confidentiality obligations.
- If you are developing new content, products, processes, designs, or software, make sure you are not infringing the intellectual property rights of third parties.

Never

- Use a lower level of classification for an email or other document than is appropriate.
- Download, sync, record, photograph, screenshot, store, or transfer nbn commercial, intellectual property, or sensitive information to a personal device (including BYOD mobile devices, laptops, hand-held devices) or to any external platform without business purpose or justification, including transferring nbn data via email, external hard drive/USB, network attached storage, virtualised desktop, or cloud storage.
- Use third-party brands or intellectual property without permission from the third party.
- Access or download unauthorised copyrighted material.
- Claim innovations made as part of your work with nbn as your own.
- Delete information and records without appropriate approvals.

 **For more information**

[Privacy Policy](#)

USING INFORMATION RESPONSIBLY

nbn takes seriously its responsibilities when handling information and records.

Our collection and use of information, including personal information, is subject to strict requirements due to our government ownership, as well as obligations under privacy, and other, laws. As a GBE, nbn must comply with the Archives Act 1983 (Cth), which requires us to keep records of our business activities and to retain them for a minimum period, as well as ensure that they are accessible, accurate, and reliable. In particular, many of nbn's documents are Commonwealth records, and if you delete them, you may be committing an offence under the Archives Act.

nbn must comply with privacy laws with regards to its collection, use, and disclosure of personal information. nbn's [Privacy Policy](#) sets out how nbn does this, and all staff are responsible for ensuring that nbn complies with the law and our [Privacy Policy](#).

In addition, telecommunications laws restrict the disclosure of "telecommunications information", including "personal particulars" and the content of communications carried on our network.

Finally, artificial intelligence (AI) tools can be valuable resources to help us do work more efficiently, but we need to ensure that using them does not endanger the security of nbn's information or compromise the ability of nbn to comply with laws and regulations. There are many AI tools available, but using the wrong ones could result in harm, including disclosing confidential information to an unsecure location.

We are committed to being transparent about the use of computer programs and automated systems that use personal information to make, or support the making of, decisions that may significantly affect individuals' rights or interests.

What does this mean for you?

You are responsible for creating reliable, accurate, and accessible records as evidence of your business decisions, actions, processes, and transactions. Where records or any other information assets are created, you are also required to provide access only to those people who need to use them, and not to share them more broadly than necessary.

If you use AI in your work, you may only use approved tools and platforms. In addition, you must make sure that appropriate human judgment is part of any decision-making processes, and not rely on AI tools alone.

Always

- Create information and records within approved nbn record systems and classify them in line with nbn classification guidelines.
- Use data efficiently - create and collect only necessary information and records.
- Appropriately detail and document use of data, including calculations or transformations where applicable.

- Share information only with the people who need to use it - do not store documents where anyone in nbn can access them unless that access is appropriate.
- Collect personal (or sensitive) information only to the extent it is necessary for your business purpose; use or disclose it only for the purpose nbn originally collected it for or as otherwise permitted under privacy laws; and keep it secure in line with nbn procedures.
- Use only nbn-approved AI tools and platforms.

Never

- Collect more personal information than you need for your business purpose, or use or disclose it in a way that is not consistent with the original reason it was collected, or otherwise permitted under privacy laws.
- Enter or upload nbn confidential information, including data or code, or personal information into unapproved Generative AI platforms such as ChatGPT.

 **For more information**

[Privacy Policy](#)

EMBRACE INNOVATION.

Innovation is the lifeblood of progress. We must be open to new ideas and willing to take risks to drive growth and improvement.



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 through applying a quality culture that puts the customer first in all that we do. We continually strive to optimise processes and improve how we meet the expectations of our internal and external stakeholders and customers. 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

- 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

- Disregard quality in delivery decisions.
- 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.



BE HUMBLE.

We celebrate our wins and strive to reach even greater heights because there is always more to achieve. Humility fosters a culture of learning and growth. By acknowledging our limitations and seeking feedback, we can continuously improve.



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.

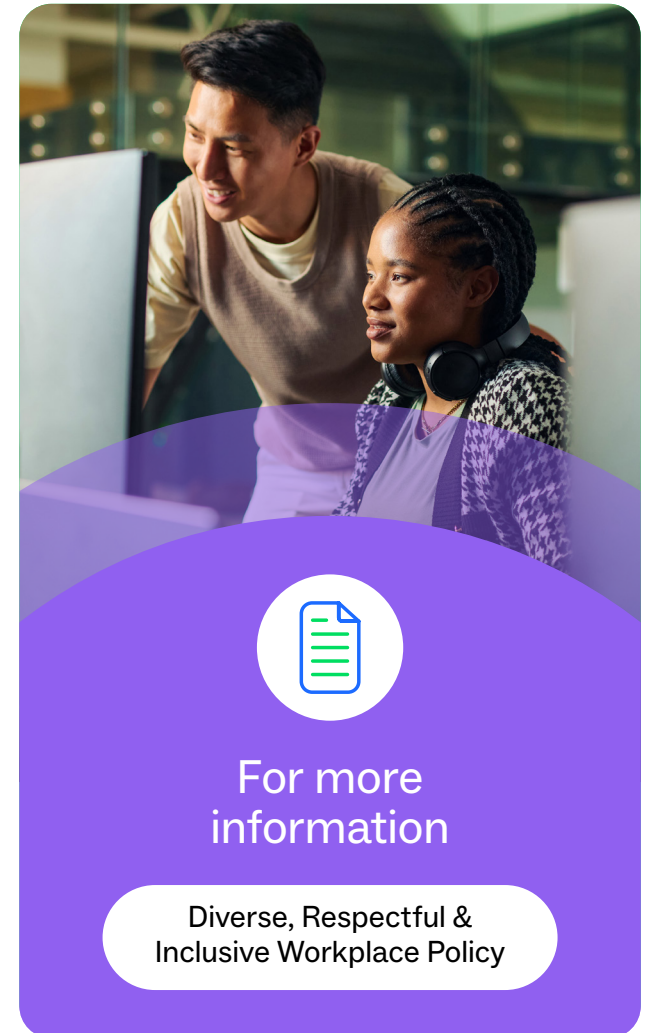
There is no place at nbn for harassment, sexual harassment, bullying, violence, racism, any form of unlawful discrimination, vilification, victimisation or other disrespectful behaviours.

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. nbn's commitment to this duty is reflected in our Respect@Work Response and Prevention Plan.

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. This includes not engaging in 'serious misconduct' or other conduct in breach of the Code.
- 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 or inappropriate 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 the following 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.

Sex discrimination

Sex discrimination happens when a person is treated less favourably than a person of a different sex in the same or similar circumstances.

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 pertains or is imputed generally to their sex. It is unlawful for a person to create such an environment and actions that could create such an environment are prohibited at nbn.

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 or an upstander.

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 sex, race, colour, or national or ethnic origin of the person or group against whom it is directed.

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.

Sex-based harassment

Any unwelcome conduct of a seriously demeaning nature by reason of the person's sex in circumstances in which a reasonable person would have anticipated the possibility that the person harassed would be offended, humiliated or intimidated.

Harassment based on a protected characteristic

Any unwelcome conduct of a demeaning nature (e.g., 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.

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.

Examples of 'reasonable management action' include, but are not limited to, performance management processes, counselling or disciplinary action for behaviour or performance, or giving employees a lawful and reasonable instruction to perform duties in keeping with their job.



At nbn, we are committed to recognising and honouring First People 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 people by helping to address social and economic disparities through improved broadband access. We are dedicated to building cultural competency across the organisation by creating culturally safe spaces for all employees, fostering two-way learning, formal education, and collaboration with First Nations people.

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 people, and amplifying the success of community-led programs.

As an organisation, nbn respects and supports:

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

 For more information

[First Nations Pillar & Reconciliation Action Plan](#)

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

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

[Conflicts of Interest \(Employees & Contractors\) Policy](#)

[Gifts or Benefits Policy](#)

THANK YOU

