



# CODE OF CONDUCT PROCEDURE

## DOCUMENT CONTROL TABLE

<b>Document Owner:</b>	People & Safety	<b>Department:</b>	Human Resources
<b>Approved By:</b>	General Manager of People & Safety		
<b>Approval Date:</b>	9 April 2024	<b>Next Review Due:</b>	9 April 2027

## Contents

1	Purpose.....	3
2	Scope .....	3
3	Metro Values .....	3
4	Code of Conduct .....	3
	4.1 Workplace Health and Safety .....	3
	4.2 Alcohol and Other Drug Use .....	3
	4.3 Work Performance and Compliance Obligations .....	4
	4.4 Workplace Relationships .....	4
	4.5 Procurement of Goods and Services .....	4
	4.6 Use of Metro Property.....	4
	4.7 Use of Metro Information .....	5
	4.8 Outside Employment and other Activities .....	5
	4.9 Conflict of Interest and Duty .....	5
	4.10 Company Records.....	5
	4.11 Accounting for Company Resources.....	5
	4.12 Public Comment .....	6
	4.13 Gifts, Benefits and Entertainment.....	6
	4.14 Taking Improper Advantage of Position .....	6
	4.15 Breach of the Code of Conduct/Complaints Provision.....	6
	4.16 Public Interest Disclosure (Whistleblowing).....	7
5	Responsibilities .....	7
	5.1 Compliance, Monitoring and Review .....	7
	5.2 Records Management .....	7
6	Review Period .....	7
7	Related and Referenced Documents.....	7
	7.1 Metro Policies, Procedures & Forms .....	7
	7.2 Legislation.....	8
8	Version Control Table .....	9

## 1 PURPOSE

Metro Tasmania (Metro) is dedicated to fostering a positive culture built on professionalism, respect, integrity, fairness, and ethical behaviour. This Code of Conduct (the Code) defines the expected standards of behaviour at Metro and aims to help individuals understand their responsibilities and obligations. While the Code does not cover every possible scenario that may arise at work, it provides clear guidelines on acceptable and unacceptable conduct.

The Code should be used alongside Metro's policies, procedures, and applicable legislation.

## 2 SCOPE

The Code applies to all Metro employees, company directors, contractors, sub-contractors and consultants (referred to as Workers from here onwards). All Workers are required to comply with the Code as a condition of their engagement by Metro.

## 3 METRO VALUES

At Metro, we take pride in being a valued based organisation and we share a commitment to a set of core principles that guide our decision making, define our culture and inspire our team.

- ***We Keep People Safe*** – we put the safety and wellbeing of our team and customers first.
- ***We Care For Our Customers*** – we value our customers and work together to meet their needs.
- ***We're On Board with Better*** – we help each other find solutions and make good things happen.

## 4 CODE OF CONDUCT

### 4.1 WORKPLACE HEALTH AND SAFETY

Metro Workers must:

- Comply with the Metro Health, Safety & Wellbeing Policy;
- Take personal responsibility for their own safety;
- Be involved in setting standards and improvement initiatives; and
- Be responsible for reporting safety hazards and work related accidents and injuries/illness.

### 4.2 ALCOHOL AND OTHER DRUG USE

Metro Workers must:

- Comply with Metro's Drug and Alcohol Management Procedure while on Metro premises or when driving Metro vehicles;
- During working hours:
  - i. not consume, distribute or sell alcohol or illegal drugs;
  - ii. not be in possession of alcohol or illegal drugs, and
  - iii. not attend the workplace with a blood alcohol content exceeding 0.00% or return a 'positive' test result for illegal drugs.

- Participate in alcohol and other drug testing when requested (noting that refusal to participate in any aspect of the drug and alcohol testing procedure will be treated as a positive test result).

### **4.3 WORK PERFORMANCE AND COMPLIANCE OBLIGATIONS**

Metro Workers must:

- Comply with all contractual, legislative and regulatory requirements;
- Comply with Metro's policies and procedures; attend work and carry out required duties as per rostered hours;
- Consistently perform work to an acceptable standard with all due care and diligence;
- Follow reasonable lawful directions from a supervisor, manager or other authorised person; and
- Present and behave professionally and wear corporate uniform when required.

### **4.4 WORKPLACE RELATIONSHIPS**

Metro Workers must:

- Treat all Metro workers, customers, stakeholders and visitors with courtesy and respect; and
- Treat and respect people equally regardless of race, age, sexual orientation, gender, gender identity, marital status, relationship status, pregnancy, breastfeeding, parental status, family responsibilities, disability, industrial activity, political belief/activity or religion.

Metro Workers must:

- Be professional, courteous and efficient in their dealing with customers, other stakeholders and competitors;
- Respond to enquiries in an accurate and timely manner; and
- Manage complaints in accordance with the Metro Complaints and Compliments Procedure.

### **4.5 PROCUREMENT OF GOODS AND SERVICES**

Metro Workers must:

- Be professional, courteous and efficient in their dealing with suppliers or prospective suppliers;
- Be honest and fair in dealings with suppliers;
- Make purchasing decisions on a commercially competitive basis and in accordance with Metro's Procurements procedures and delegations; and
- Fully comply with competition and consumer laws.

### **4.6 USE OF METRO PROPERTY**

Metro Workers must:

- Use Metro property or equipment in accordance with the procedures and processes associated with Metro property or equipment being used;
- Only use Metro property for authorised purposes and not for personal use unless authorised by their Manager or permitted by a Metro procedure;
- Return all Metro property if no longer undertaking work for Metro; and

- Comply with Metro's Privacy Policy and Acceptable Use of Information & Communication Technology Procedure.

#### **4.7 USE OF METRO INFORMATION**

Metro Workers must:

- Maintain the confidentiality of Metro's information, only use it for work purposes and protect it from disclosure, including information in relation to Metro's business, its customers, workers and business associates;
- Collect, use, disclose, secure and deal with information according to Metro's Privacy Policy noting that special obligations apply in relation to personal or sensitive information;
- Follow the Metro Access to Employee Records Procedure; and
- Maintain confidentiality even after ceasing work for Metro.

#### **4.8 SECONDARY EMPLOYMENT AND/OR OTHER ACTIVITIES**

Metro's Employment Contracts outline secondary employment requirements to ensure compliance with fatigue management rules. These measures help prevent activities that could compromise operators' ability to meet Metro's safety and performance standards.

Operators are contractually required to declare any involvement in a business or organisation that may conflict with their role or Metro's operations. This declaration, submitted via email or a Bus Operator Report, will be securely stored in the employee's file within Content Manager.

#### **4.9 CONFLICT OF INTEREST AND DUTY**

Metro Workers must:

- Disclose, in writing, any financial interests or fiduciary roles that actually or potentially (or could create the perception of) conflict with the interests of Metro or their duty to Metro; and
- Declare if, in any of their business dealings, there exists a conflict of interest or duty which may bias their action/decisions during the course of carrying out their role. Such declaration is to be made in the case of a Board member by declaring it to the Board, in the case of an executive by declaring it to the Executive Leadership Team, and in the case of other workers by declaring it to their manager.

#### **4.10 COMPANY RECORDS**

Metro Workers must ensure all records prepared are accurate, timely and factual and saved into Metro's system in accordance with Metro's Acceptable Use of Information and Communication Technology Procedure.

#### **4.11 ACCOUNTING FOR COMPANY RESOURCES**

Metro Workers must:

- Use all money/credit facilities and other assets under their control, properly and for the intended purpose and be able to account for their use; and
- Dispose of any assets or property no longer required by Metro by completing a Disposal of Fixed Assets Form.

#### **4.12 PUBLIC COMMENT**

Metro Workers must:

- Direct all media enquiries about Metro to the Chief Executive Officer or, in their absence, the General Manager Corporate Services
- Not make statements or comments to the media (including social media or online platforms) or other external bodies regarding Metro or its financial status, customers, suppliers or business dealings unless directed or authorised by the Chief Executive Officer or, in their absence, the General Manager Corporate Services;
- Not reference Metro ,the workplace, other workers or customers negatively on any social medium or public forum;
- Not release confidential Metro information;
- Not post or send anything containing inappropriate, false or malicious comments or materials online or electronically regarding Metro, the workplace, other workers or customers. This includes, but is not limited to, social media, online platforms, emails and text messages; and
- Not post or send anything containing inappropriate, false or malicious comments or materials online or electronically when identified as a Metro worker. This includes, but is not limited to, profile and other photographs when wearing a Metro uniform and personal information that includes workplace.

#### **4.13 GIFTS, BENEFITS AND ENTERTAINMENT**

Metro Workers must:

- Comply with the Metro Acceptance of Gifts, Benefits and Hospitality Procedure including by:
  - i. neither giving nor taking a gift or benefit or any other payments that may be perceived to compromise judgement, damage relationships or indicate favouritism towards a supplier, sub-contractor or other person; and
  - ii. disclosing all gifts/benefits to their manager who will decide on the appropriateness of accepting them and record them in any required requester.
- Inform their manager or supervisor of reportable gifts/benefits exceeding \$100. All gifts/benefits exceeding \$100 in value must be recorded in the Register of Reportable Gifts/Benefits and only the Chairperson/General Manager/CEO can approve the acceptance of reportable gifts/benefits.

#### **4.14 TAKING IMPROPER ADVANTAGE OF POSITION**

Metro workers must:

- Ensure their position, title or authority at Metro is not utilised to benefit themselves or others personally or to coerce or induce such a benefit; and
- Comply with the Metro Fraud and Corruption Control Procedure.

#### **4.15 BREACH OF THE CODE OF CONDUCT/COMPLAINTS PROVISION**

Any person, whether a Metro worker or not, may lodge a complaint if they believe there has been a breach of the Code. This complaint should be directed to the General Manager of People & Safety either verbally or in writing, specifying the details of the alleged breach.

Breaches of the Code by employees will be dealt with in accordance with the Grievance Resolution Procedure and may result in disciplinary action including (depending on the severity of the breach) reprimand, formal warning, demotion, termination of employment, or termination of contract. For other workers, breaches of the Code will be dealt with in accordance with the relevant contract and may result in outcomes including a claim for breach of contract or termination of contract.

#### **4.16 PUBLIC INTEREST DISCLOSURE (WHISTLEBLOWING)**

In extreme circumstances a worker may be concerned that a serious breach of the Code has occurred but considers that it would be personally damaging to report it as outlined above.

In such circumstances the worker should refer to Metro's Public Interest Disclosure Procedure for information about who to speak to and how to make a report.

Metro's Public Disclosure Procedure is based on the *Public Interest Disclosures Act 2002*. This procedure is available on Metro's Intranet.

Delegated Officers under the Public Interest Disclosure Procedure will do all that is possible and practicable to ensure the identity of the individual and the identity of the person who is the subject of the report are kept confidential.

### **5 RESPONSIBILITIES**

#### **5.1 COMPLIANCE, MONITORING AND REVIEW**

The General Manager of People & Safety, or their delegate, is responsible for reviewing this Procedure in accordance with its review cycle, or if changes to legislation, regulations, or government policies necessitate a review.

Approval of this Procedure rests with the General Manager of People & Safety, or their delegate. If the Procedure applies across multiple departments, it may be presented for consultation with the Executive Leadership Team (ELT) before final approval.

The ELT must ensure the ongoing application of the Code reflects current good practice in ethical behaviour, complies with relevant legislation and is applied by Metro in its day to day operations.

All Workers must abide by this Procedure and sign the Code of Conduct Acknowledgement Form, and report any breaches of the Code to Metro.

#### **5.2 RECORDS MANAGEMENT**

Metro must maintain all records relevant to administering this document in Metro's Electronic Records and Document Management System, *Content Manager*.

### **6 REVIEW PERIOD**

This Procedure will be reviewed every three years or earlier if required.

### **7 RELATED AND REFERENCED DOCUMENTS**

#### **7.1 METRO POLICIES, PROCEDURES & FORMS**

[Acceptance of Gifts, Benefits and Hospitality Procedure](#)

[Acceptable Use of Information and Communication Technology Procedure](#)

[Access to Employee Records Procedure](#)  
[Fraud & Corruption Control Procedure](#)  
[Code of Conduct Acknowledgement Form](#)  
[Code of Conduct Policy](#)  
[Complaints and Compliments Procedure](#)  
[Disposal of Fixed Assets Form](#)  
[Drug and Alcohol Management Procedure](#)  
[Grievance Resolution Procedure](#)  
[Over the Counter Medication Notification Form](#)  
[Prescription Drug Notification Form](#)  
[Privacy Policy](#)  
[Public Interest Disclosure Procedure](#)  
[Health, Safety & Wellbeing Policy](#)

## **7.2 LEGISLATION**

*Age Discrimination Act 2004 (CTH)*  
*Age Discrimination Regulations 2020 (CTH)*  
*Anti-Discrimination Act 1998 (TAS)*  
*Australian Human Rights Commission Act 1986 (CTH)*  
*Australian Human Rights Commission Regulations 2001 (CTH)*  
*Crimes Act 1914 (CTH)*  
*Crimes Regulations 2019 (CTH)*  
*Disability Discrimination Act 1992 (CTH)*  
*Disability Discrimination Regulations 2019 (CTH)*  
*Fair Work Act 2009 (CTH)*  
*Fair Work Regulations 2009 (CTH)*  
*Personal Information Protection Act 2004 (TAS)*  
*Privacy Act 1988 (CTH)*  
*Privacy Regulations 2013 (CTH)*  
*Public Interest Disclosure Act 2002 (TAS)*  
*Public Interest Disclosure Regulations 2013 (TAS)*  
*Workplace Health and Safety Act 2012 (TAS)*  
*Workplace Health and Safety Regulations 2022 (TAS)*



## 8 VERSION CONTROL TABLE

No:	Date	Details	Status
1	20/02/19	Redesigned for CM. Previous versions archived. No content change.	Superseded
2	01/12/20	Biannual review conducted by GMPS. No content change required.	Superseded
3	26/04/21	Positions titles updated to reflect organisational structure review. No further content changes required.	Superseded
4	15/09/21	Inherent risk rating removed from Review Period at the request of the ELT.	Superseded
5	01/02/22	Procedure updated to reflect Metro's revised Vision & Values. Sub-section f) added under Section 5.13. Other minor amendments made to update Procedure and position titles.	Superseded
6	19/12/23	Vision, Mission & Values updated. Review date extended to 31/12/24 at the request of General Manager People & Safety. The Board has request a full Code of Conduct Policy be developed.	Superseded
7	09/04/24	Reviewed. Workplace Behaviour Procedure, Workplace Behaviour Acknowledgement Form and Discipline Procedure replaced with Grievance Resolution Procedure. Reference to Corporate Credit Card Procedure removed. Reference to Work, Health & Safety Policy updated to Health, Safety & Wellbeing Policy.	Superseded
8	11/12/24	Process to declare secondary employment updated.	Current