

Corporate Compliance

1. Overview

1.1 At a glance

Sydney Water is committed to comply with all relevant laws and other voluntary commitments we have made (compliance obligations).

To be consistent with the International Standard for Compliance Management Systems (ISO 37301:2021), including meeting the intent of this Corporate Compliance Policy, Sydney Water implements a Corporate Compliance Management System (CCMS). The CCMS provides the framework for Sydney Water to meet its compliance obligations.

1.2 Scope

This policy applies to all Sydney Water staff (including agency hire), partners and contractors.

1.3 Objective

This policy declares Sydney Water's commitment to comply with all identified legislative requirements as well as any voluntary compliance commitments we have made.

The policy covers actions taken to manage, implement, monitor and report on compliance with obligations including:

- *Sydney Water Act 1994*
- Sydney Water Operating Licence
- legally enforceable instruments that apply to Sydney Water
- voluntary commitments to other standards and codes.

2. Policy in detail

Sydney Water is committed to comply with all relevant laws and other commitments which is consistent with our values and risk appetite. We do this because we are committed to deal fairly with customers, stakeholders, suppliers, partners, contractors, and competitors. We also commit to protect the safety of our staff, public health, and the environment in which we operate.

Compliance is the responsibility of everyone who works at or on behalf of Sydney Water. If Sydney Water, its staff, partners and contractors do not meet their compliance obligations, penalties may be imposed on Sydney Water and on individual Directors, staff or contractors. Sydney Water employees who knowingly ignore processes, leading to a compliance breach, might be fined by a court and face disciplinary action.

As reflected in the Board's [risk appetite statement](#), Sydney Water will operate in accordance with our legal and regulatory requirements and expects all engaged contractors to do the same. Staff, partners and contractors should follow set procedures to ensure compliance with both our legal requirements and non-statutory requirements we have voluntarily committed to meet. Any failure to comply with operational processes is taken very seriously.

Sydney Water expects and trusts its staff, partners and contractors to be ethical and has no tolerance for fraud or corruption.

The Corporate Compliance Management System (CCMS) provides the framework for Sydney Water to meet its compliance obligations and the intent of this policy. Under the framework, the Audit and Risk Committee is responsible for the review and endorsement of this policy and the Managing Director is responsible for its approval.

Continuous improvement is an important component of the CCMS to ensure ongoing compliance. The CCMS is reviewed through periodic internal review to ensure appropriate processes are in place to identify, manage and report on compliance obligations.

Part of the continual improvement process also includes the proactive reporting of potential compliance issues. Any material compliance issue should be notified to compliance@sydneywater.com.au for review. Sydney Water promotes a positive reporting culture where issues are reported openly and dealt with in accordance with our [Fair and Just process](#).

3. Definitions

Term	Definition	Source
Compliance	Meeting all Sydney Water's compliance obligations.	ISO 37301:2021 Compliance management systems
Non-compliance (compliance breach)	Non-fulfilment of compliance obligations.	ISO 37301:2021 Compliance management systems
Compliance obligations	Requirements that are mandatory for Sydney Water to comply with (e.g applicable laws and licence conditions) as well as those that Sydney Water voluntarily chooses to comply with (e.g. non statutory standards and codes).	ISO 37301:2021 Compliance management systems

4. Context

4.1 Accountabilities

Position	Accountabilities
Managing Director	<ul style="list-style-type: none"> Approval of the Corporate Compliance Policy.
Audit and Risk Committee	<ul style="list-style-type: none"> Review and endorsement of the Corporate Compliance Policy and Corporate Compliance Management System.
Executive General Manager, People and Governance	<ul style="list-style-type: none"> Endorse the Corporate Compliance Policy as sponsor of the Corporate Compliance Framework.
Executive General Managers	<ul style="list-style-type: none"> Responsible for ensuring compliance obligations of their Group are allocated to appropriate managers, and procedures and systems are in place to achieve compliance. This includes the allocation of appropriate tools and resources.
Corporate Compliance Manager	<ul style="list-style-type: none"> Review and maintenance of the Corporate Compliance Policy and implementation of the Corporate Compliance Management System to meet the intent of the policy.
All staff (including agency hire), partners and contractors	<ul style="list-style-type: none"> Responsible for conducting activities in accordance with the Corporate Compliance Policy to meet Sydney Water's compliance obligations.

4.2 Training and competencies

Position	Training or competency
All staff	Awareness of the Corporate Compliance Policy through the corporate induction process.

4.3 References

Document type	Title
Compliance obligations	Compliance Accountability Register Operating Licence Compliance Register
Other documents	ISO 37301:2021 Compliance management systems – Requirements with guidance for use Corporate Compliance Management System Manual (D0000355)