



Infrastructure WA

Code of Conduct

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This plan is available in alternative formats such as in standard and large print, in electronic format by email, in audio format on CD and on IWA's website on request.

At a glance – how we live our values

At Infrastructure WA, our Code of Conduct sets out how we put our values into practice every day. It applies to Board and committee members, employees and contractors, and guides how we act with each other, with stakeholders and with the Western Australian community.

Our values in action

Excellence

We deliver high-quality, trusted advice and perform our duties with professionalism and care.

- We act lawfully, diligently and in the public interest.
- We provide advice that is robust, evidence-based and impartial.
- We use public resources responsibly and record our decisions transparently.
- We continuously build our capability and meet our training obligations.

Ask yourself: Is what I'm doing careful, well-considered and worthy of public confidence?

Trust

We act with integrity and are accountable for our decisions, actions and use of information.

- We act honestly and use our authority only for its intended purpose.
- We protect privileged, confidential and sensitive information.
- We declare and manage conflicts of interest.
- We speak up about suspected misconduct and support others who do.

Ask yourself: Would I be comfortable explaining this decision publicly?

Engagement

We work constructively with colleagues, government and stakeholders.

- We communicate professionally, respectfully and consistently.
- We engage appropriately with Ministers, Parliament, the media and stakeholders.
- We follow approved processes for communication, lobbying and information release.
- We contribute to respectful, productive relationships inside and outside IWA.

Ask yourself: Am I engaging in a way that strengthens relationships and trust?

People

We create a safe, respectful and inclusive workplace where people can do their best work.

- We treat everyone with courtesy, fairness and respect.
- We support a safe and productive work environment, free from bullying, harassment and discrimination.
- We value diversity and different perspectives.
- We take responsibility for our behaviour and its impact on others.

Ask yourself: Does my behaviour support a workplace where people feel safe and respected?

Our shared responsibility

- Everyone is responsible for understanding and complying with the Code.
- Leaders and managers have additional responsibility to model ethical behaviour and support others to speak up.
- Breaches of the Code are taken seriously and may result in disciplinary or other action.

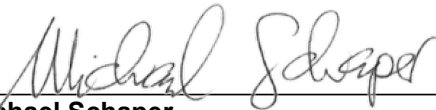
The Code does not cover every situation. When in doubt, pause, seek advice and act in line with our values.

Message from the Chairperson and Chief Executive Officer

Infrastructure WA (IWA) employees and Board and committee members must act with integrity to ensure the Western Australian community and government have confidence in IWA's performance. Board members and employees have a personal and collective responsibility to act transparently and efficiently, for the benefit of the community. As a statutory authority with a degree of independence there is further responsibility to ensure our advice and decisions are robust and impartial. This will assist to build our organisational trust and reputation, critical to the success of IWA.

The [Western Australian Public Sector Code of Ethics](#) (Code of Ethics) sets out the minimum standard of conduct and integrity, and applies to all public sector employees, as well as members of government boards and committees. IWA's Code of Conduct complements the Code of Ethics and applies to all IWA Board and committee members, employees and contractors. The Code of Conduct sets out the ways in which Board and committee members, employees and contractors, are expected to behave individually, with colleagues and with stakeholders.

We urge you to read and familiarise yourself with this Code of Conduct and supporting information and continue to refer to it as you perform your role as a Board, committee, employee or contractor. This document should be read and applied in conjunction with the *Infrastructure Western Australia Act 2019* (IWA Act). Talking through issues with others will assist you in managing a variety of situations throughout your tenure with IWA and will be critical for our reputation and success, as we serve the Western Australian community.



Michael Schaper
A/Board Chairperson

April 2026



Phil Helberg
Chief Executive Officer

April 2026

Review date

The Board will review the Code of Conduct every 3 years or sooner as necessary to ensure it meets the needs of the organisation and complies with relevant government frameworks, guidelines and policies.

The Code of Conduct and any amendments to it require approval of the Board.

Version #	5.0
Policy Owner	Chief Executive Owner
Last Amended	April 2026
Next Review	April 2029

Applicable legislation

Infrastructure Western Australia Act 2019

Public Sector Management Act 1994

Freedom of Information Act 1982

Other references

Public Sector Commissioner's Instruction No. 40: Ethical Foundations

Introduction

In accordance with the *Public Sector Management Act 1994* (PSM Act) and *Commissioner's Instruction No. 40: Ethical Foundations*, all public sector bodies (including statutory authorities), are required to develop, implement and promote a code of conduct, and ensure compliance with that code. The Code of Conduct must set out the standards of conduct and integrity to be complied with by the public sector body and its employees.

The Code of Conduct must also be consistent with the principles and standards as outlined in the Public Sector Code of Ethics as follows:

Principles of conduct: Section 9 of the PSM Act

We:

- comply with legislation, Commissioner's instructions, public sector standards and any applicable code governing our conduct.
- act with integrity.
- use official information, equipment and facilities scrupulously.
- deal with people courteously, considerately and sensitively.

Minimum standards of conduct and integrity

Standard 1: Integrity

We:

- act honestly and uphold the trust placed in us by the community.
- use our position and authority for the purpose intended.
- provide objective and timely advice to the government of the day.
- ensure our behaviour upholds the good reputation of our public sector body and the public sector.

Standard 2: Impartiality

We:

- make considered and unbiased decisions based on merit.
- place the public interest over our personal interest.
- declare and manage conflicts of interest.
- implement government priorities, policies and decisions impartially.

Standard 3: Respect for others

We:

- communicate with and treat people with respect.
- treat people fairly, having regard for their diverse backgrounds.
- work together constructively, inclusively and professionally.

Standard 4: Trust and accountability

We:

- take accountability for our time, decisions and behaviours.
- are responsive and provide considered advice and information to our clients, customers and stakeholders.
- make decisions that ensure the best use of resources for now and the future.
- access, use and disclose information only where we are authorised to do so.
- record our decisions for transparency allowing for review and scrutiny.

All sections of the IWA Code of Conduct should be read through the lens of these standards.

The Code of Conduct provides guidelines to support ethical and accountable behaviour for Board and committee members, IWA employees and contractors. It defines the standards of official conduct and personal behaviour expected of all employees and members and promotes compliance with the broad principles of personal integrity in the performance of official duties, exercising courtesy, consideration and sensitivity in relationships with others, and being scrupulous when using government assets and information.

Scope

The Code of Conduct applies to all Board and committee members, employees of IWA and contractors. It may also apply to contractors and consultants to IWA if required by the relevant contractual arrangements or by law.

The Chairperson and CEO are responsible for ensuring Board and committee members, employees and contractors (respectively) are aware of the Code of Conduct. All Board and committee members, IWA employees and contractors are individually responsible for complying with this Code of Conduct.

Note that the Code of Conduct does not attempt to cover all situations, but rather it provides a set of broad principles to support a common-sense approach to decision making and should be read in addition to the Code of Ethics.

Code of Conduct

Personal behaviour

The way in which you behave in the workplace must be respectful of your colleagues and members of the public. At all times you should act honestly and fairly and carefully consider the consequences of your behaviour.

This means that in addition to the Code of Ethics we:

- maintain and contribute to a psychologically safe workplace, wherein people are allowed to speak up, ask questions, and make mistakes without fear of humiliation.
- serve the Government of the day professionally and impartially and provide timely, well-considered information and policy advice in accordance with the IWA Act.
- understand the consequences of misconduct and actions that may be taken if we do not comply with this Code and associated policies
- undertake Accountable and Ethical Decision-Making training every 3 years, or sooner as necessary.

As Board and committee members we:

- understand our Board's and committee's role by actively learning and staying informed about:
 - the role and purpose of our Board and committee and the statutory, regulatory and policy requirements that apply when carrying out our public duties
 - the political and social environment in which our Board and committee operate
 - all relevant issues and activities affecting our Board and committee.
- will put the public interest first, ahead of our own personal and pecuniary interests, and act with loyalty, in good faith, ethically and with integrity by:
 - exercising our powers and discharging our duties in the best interests of the entity of which we are members
 - being accountable and transparent
 - doing our job lawfully, with reasonable care and diligence and as efficiently and effectively as possible
 - fulfilling the Board and committee's statutory purposes and requirements and, to the extent permitted by the IWA Act, serving the Government of the day.
- have adopted and will comply with industry best practice as outlined by Australian Institute of Company Directors' Code of Conduct.

Additional responsibilities of managers and leaders

Managers and leaders within IWA are additionally responsible for:

- ensuring their teams are informed about the code and supported to understand their roles and obligations within it.
- modelling appropriate conduct and behaviour.
- supporting employees to speak up and protecting those who do from victimisation.
- identifying and managing risks that could lead to corruption or misconduct.

Communication and official information

We recognise that information is a key factor in enabling IWA to deliver high quality advice to the Premier and Government. You are expected to use confidential information gained while performing your duties only for authorised purposes. Unauthorised disclosure of information will place yourself and IWA at risk.

In addition to the Code of Ethics, we:

- comply with the confidentiality provisions of the IWA Act, and are reminded that Board meetings, discussions and decisions are covered by confidentiality provisions and should not be disclosed or discussed outside these proceedings.
- seek advice about the appropriate release of information if unsure.
- adhere to any policies and lawful directions regarding communication with Parliament, Ministers, Ministerial staff, lobbyists, the media and members of the public, including the Office of the Premier and Infrastructure WA Communications Agreement set under section 74(1) of the PSM Act.

Fraudulent or corrupt behaviour

IWA is committed to the principle of open and accountable government. You must be accountable for your decisions and actions. You are also responsible for reporting the inappropriate behaviours of others.

This means that we comply with:

- the *Public Information Disclosure Act 2003*.
- the Public Interest Disclosure procedures.

Use of public resources

You are required to use IWA's resources responsibly and any personal use of resources must comply with IWA's policies and be kept to a minimum. The use of IWA resources for illegal purposes and/or commercial gain will be addressed in accordance with the relevant legislation and IWA's disciplinary procedures.

Incurring expenditure

As IWA employees, Board and committee members we will:

- not approve our own expenditure for travel claims, reimbursements, credit card payments, any allowance or subsidy, unless specifically authorised in writing to do so.
- maintain accurate records of all expenditure on IWA business and provide documentation in a timely manner for processing and approval to relevant IWA employees (note: expenditure will be acquitted in line with the *Financial Management Act 2006*).
- adhere to:
 - the Department of Premier and Cabinet's (DPC) Financial Management Manual.
 - IWA's financial policies and procedures.

Travel and accommodation

As IWA employees, Board and committee members we will:

- comply with:
 - *Premier's Circular 2021/02 Guidelines for official air travel by Ministers, Parliamentary Secretaries and Government Officers*.
 - the IWA Travel policy.
 - Treasurer's Instruction's TI 406 – Custody of Public Property and TI 411 – Motor Vehicles
- in the first instance to use government's endorsed travel management company.

Providing hospitality

As IWA employees, Board and committee members we will:

- ensure that any hospitality provided by the Board is consistent with the Board's genuine needs and public duty, in compliance with *PSC's Circular: 2009-18 Guidelines for expenditure on official hospitality*.
- comply with the IWA:
 - Gifts, Benefits and Hospitality policy.
 - Providing Hospitality policy.

Use of phones

IWA employees, and Board and committee members with access to corporate phones should keep personal usage to a minimum and not make private commercial business calls.

As IWA employees, Board and committee members we will comply with:
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- DPC's ICT Acceptable Use policy.
- DPC's ICT Mobile Device Usage policy.

Social Media and AI

Use of social media at IWA is guided by the *DPC ICT Acceptable Use Policy (ICT001)*. Social media includes any website or platform that allows anyone to connect and share information online. Examples of social media are YouTube, Twitter, LinkedIn and Facebook.

Use of AI at IWA is outlined by the IWA Artificial Intelligence Policy (*currently in draft, to be linked once approved*) and guided by the following digital government best-practice principles:

- Digital tools (including AI) must support transparency, accuracy and public trust, and
- Accountability for outputs remains with the human decision-maker.

Recordkeeping and use of information

The integrity and accuracy of information generated by IWA is fundamental to the delivery of a highly trusted and reputable service to the Premier, Government and members of the Western Australian community. You should ensure that all information is managed to a high standard in accordance with relevant policies and plans.

This means that as IWA employees, Board and committee members we:

- adhere to:
 - IWA's Record Keeping Plan
 - IWA's Record Keeping Procedure
 - the *Freedom of Information Act 1982*.
- avoid discussing sensitive or confidential business in public places where there is a likelihood of being overheard.
- refer all enquiries related to public access to documents where Freedom of Information (FOI) is concerned to the FOI Coordinator within the Department of the Premier and Cabinet.

Conflicts of interest and gifts and benefits

IWA respects your privacy and does not normally take an interest in your external activities. However, when personal, social, financial or political activities interfere, or have the potential to interfere with your professional duties, a conflict of interest may exist. A conflict of interest is not necessarily a problem, but it must be declared and managed accordingly.

This means that that as IWA employees, Board and committee members we comply with the:

- IWA Conflict of Interests policy
- Board and committee charters.

Reporting suspected breaches of the Code

Failure to comply with the Code of Conduct is a serious matter that may lead to disciplinary action. If IWA is satisfied that a breach has occurred, relevant management will determine the nature of any disciplinary action (in consultation with other sources of advice, as required).

The nature of the disciplinary action will depend on the seriousness of the breach, including report to the Public Sector Commission and/or the Corruption and Crime Commission, If the situation involves breaking any laws, the matter may also be referred to law enforcement authorities for investigation. You are encouraged to report any suspected or potential breaches of the Code of Conduct.

All reports or complaints made should also be compliant with the IWA Code. Deliberately false or misleading reports are themselves breaches and may in some cases be unlawful.

You should ensure that, in the first instance, the issue is discussed with your line manager (if you are a Board member this is the Chairperson), a Public Interest Disclosure Officer (either internal to IWA or any officer listed on [the contact directory](#)), the Chief Executive Officer, the Deputy Chief Executive Officer or a support person.

This means that we:

- are obliged to make ourselves familiar with this Code of Conduct.
- are aware of the avenues for reporting a breach of the Code of Conduct, including options available under the *Public Interest Disclosure Act 2003*.
- report, as soon as reasonably practicable, any actual or suspected breaches of this Code of Conduct.

What happens when a breach is reported

Breaches of this Code of Conduct are serious matters.

Depending on the nature and severity of the breach, consequences may include:

- counselling or formal warnings
- performance management action
- disciplinary action, up to and including termination of appointment or employment
- referral to external integrity or law enforcement agencies where required by law or at the discretion of the Chief Executive Officer.

IWA has statutory obligations to notify relevant integrity bodies of suspected serious misconduct or criminal behaviour. All matters are managed promptly, fairly and confidentially, in accordance with procedural fairness and applicable legislation.

How a particular matter is addressed will depend on a thorough assessment of the circumstances.

Further details regarding internal methods of resolution may be found in IWA's Grievance Resolution Policy and procedures, Discipline Guidelines, or Substandard Performance Guidelines.

IWA employees who report concerns will be supported and protected from reprisal and victimisation. These responses are themselves breaches of our Code of Conduct, and may in some cases be unlawful, and will be treated as such.

It is possible to make anonymous reports should they include sufficient information for the matter to be fully considered.

Further information

If you require any further advice or information or have comments or suggestions in relation to the Code of Conduct, please contact the IWA team. You can also speak to:

- your manager
- the Public Interest Disclosure Officer/s
- Deputy Chief Executive Officer
- Chief Executive Officer.

Board and committee members should refer to the Chairperson in the first instance.



Infrastructure
Western Australia

Code of Conduct declaration

All employees of IWA are bound by the Code regardless of whether they sign the acknowledgment below. Please complete this form and return it to the Human Resources Director.

Full name:

Position Title:

I confirm that I:

- acknowledge and understand my obligation to meet the Code and its related policies,
- acknowledge that failure to comply with the Code and the PSC's Code of Ethics may have consequences for my employment,
- recognise that the Code cannot cover every situation, and that I am accountable to use my judgement and seek responsible advice,
- will act in accordance with the Code at any time I represent IWA, and I acknowledge this obligation extends to my behaviour outside standard working hours, and
- will regularly refresh my memory with the content of the Code during my employment.

Employee's signature:

Date: