

Probity Policy

Supply Chain

(Acquisition and Management of Goods, Services and Works).

5 October 2026

Public

TasNetworks acknowledges the palawa (Tasmanian Aboriginal community) as the original owners and custodians of lutruwita (Tasmania). TasNetworks, acknowledges the palawa have maintained their spiritual and cultural connection to the land and water. We pay respect to Elders past and present and all Aboriginal and Torres Strait Islander peoples.



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1. Policy Overview

TasNetworks is committed to end-to-end sourcing processes and contract lifecycle management that is fair, and transparent. Our decisions are accountable and defensible, and our activities are conducted with integrity and in the best interests of TasNetworks, its customers and the Tasmanian community.

This policy exists to ensure TasNetworks supply chain activities are consistent, accurate and compliant with TasNetworks' legal and regulatory obligations, internal policies and procedures and relevant standards. It supports effective risk management and alignment with TasNetworks' strategic objectives, including safety, reliability and value for money.

Who does this Policy apply to?

This Policy applies to all TasNetworks leaders, team members, trainees, suppliers and contractors undertaking supply chain activities on behalf of TasNetworks. It may also affect TasNetworks' customers and clients. It applies to companies within the TasNetworks Group, and a reference to TasNetworks in this Policy includes a reference to group companies (TasNetworks Group means TasNetworks and its subsidiaries).

TasNetworks' subsidiaries are TasNetworks Holdings Pty Ltd, Fortytwo24 Pty Ltd, and TasNet Connections Pty Ltd.

2. The Policy

Purpose

The purpose of this Probity Policy is to outline TasNetworks' position on probity in supply chain activities. It confirms TasNetworks' expectation that all leaders, team members, trainees, suppliers and contractors and other identified parties act with honesty and integrity when planning, conducting and managing supply chain activities.

The Policy is intended to:

- **Define** TasNetworks' commitment to good governance, integrity and ethical decision making across all supply chain activities.
- **Ensure** compliance with applicable laws, regulatory and confidential obligations and TasNetworks policies, standards, processes and procedures.
- **Promote** fair, transparent and consistent processes, including equitable access to information, impartial decision making, without bias and effective management of probity risks.
- **Strengthen** accountability through accurate and auditable record keeping, ensuring a defensible position for all decisions and appropriate governance oversight.
- **Protect** TasNetworks' integrity by fostering trusted relationships with suppliers and contractors, by maintaining confidence and minimising reputational risk.

For the purposes of this Policy, probity is defined as *evidence of an ethical, fair, transparent and defensible procurement process. It requires conflicts and bias to be identified and managed, suppliers to be treated equitably, information to be protected and decisions to be documented. Evaluations must use approved criteria and evidence from submissions, approved clarifications and documented due diligence. Personal or undisclosed historical knowledge must not influence the evaluation.*

Probity Principles

The following probity principles establish the minimum standards expected of all team members involved in supply chain activities.

Probity Principle	Description
Responsibility	All employees are accountable for their decisions, actions, exercise sound judgement, follow approved processes, and make decisions that are in the best interests of TasNetworks, its customers and the Tasmanian community.
Transparency	Supply chain activities are open, appropriately documented and capable of being explained. Records are maintained so that decisions can be understood and independently reviewed.
Fairness, Integrity and Defensible	Treat all suppliers consistently, respectfully and without bias. Decisions are made objectively, based on merit, established methodology and evaluation criteria.
Accuracy and Reliability	Ensure information, records and decisions are accurate, complete and reliable. Supply chain activities are supported by evidence that is current and fit for purpose.
Information Security and Appropriate Use of Data	Protect confidential, commercial and personal information and use it only for the purpose for which it was collected or authorised. Information is managed in accordance with legal, contractual and organisational requirements.
Conflict of Interest	Identify, disclose and appropriately manage actual, potential and perceived conflicts of interest to maintain impartiality and public confidence in our decisions.
Compliant and Ethical Conduct	Comply with all applicable legislation, policies, procedures and contractual obligations and conduct all supply chain activities in a manner that upholds ethical standards, supports public trust and protects TasNetworks reputation.

Probity Commitments

TasNetworks and its team members make the following commitments under this Policy:

- **Embed** probity principles into all supply chain activities to support fair, transparent and accountable decision making.
- **Promote** a culture of integrity by encouraging early identification, declaration and management of conflicts of interest and other probity risks.
- **Support** compliance by providing clear governance, defined roles and responsibilities and appropriate training and guidance.
- **Maintain** accurate records and governance oversight to ensure decisions are transparent, well documented and capable of withstanding scrutiny.
- **Respond** promptly and appropriately to suspected breaches of this Policy, taking corrective action where required and supporting continuous improvement.

Benefits

The Probity Policy provides the following benefits:

- **Reduces** the risk of conflicts of interest, undue influence or bias, misconduct, complaints and / or legal reputational risk.
- **Strengthens** trust and confidence among suppliers, TasNetworks customers and the Tasmanian community.
- **Supports** value for money, fair competition and responsible procurement outcomes.

Measurable Objectives

The Probity Policy supports the following measurable objectives:

- **Manage** conflicts of interest are identified, declared, recorded and appropriately managed.
- **Apply** appropriate probity oversight, including the use and recording of external probity advisors for identified procurement activities.
- **Monitor** compliance with probity requirements through procurement assurance, governance reviews and reporting.

Roles and Responsibilities

All Leaders and Team Members have a responsibility for advancing Probity in the TasNetworks supply chain.

Role	Responsibilities
TasNetworks Executive Leadership Team (ELT)	• Responsible for approving this Policy. • Advocating probity and its principles at TasNetworks.
Heads of Function and Leaders	• Advocating probity and its principles at TasNetworks.
Head of Supply Chain	• Champion probity and its principles at TasNetworks.
Procurement Team Leader	• Lead, support and enable the implementation of the Policy. • Approve the engagement of external Probity Advisors.
Supply Chain Team	• Promote, support and enable the implementation of the Policy.
Team Members	• Adhere to and apply this Policy. • Responsible and accountable for individual supply chain activities and decisions. • Ensure good probity practices are applied and seek advice early.

Conflict of Interest

Actual, potential and perceived conflicts of interest (COI) must be identified early, declared promptly, appropriately recorded, and managed consistently to protect the integrity of supply chain activities and decisions.

- Actual: there is a real conflict between a person's duties to TasNetworks and their private interests.
- Potential: the person has a private interest that could conflict with their duties to TasNetworks.
- Perceived: a third party could form a view that a person's private interests could improperly influence the performance of their duties for TasNetworks.

Conflict management should be documented so decisions can be reviewed and verified. For further advice and guidance, please refer to the TasNetworks Conflict of Interest Policy and the Probity Guideline.

Probity Advice and Application

All supply chain activities require an appropriate level of probity. The level of governance, documentation and oversight should be proportionate to the value, complexity, sensitivity and risk of the activity. Procurement activities are generally managed through standard procurement controls, while procurement activities with increased value, complexity, sensitivity, risk or potential scrutiny may require additional probity measures, including the engagement of an external Probity Advisor. For further advice and guidance, please refer to the TasNetworks Probity Guideline.

3. Compliance

All team members are responsible for complying with this Policy, and any breaches of this Policy will be treated seriously and may result in disciplinary action being undertaken.

Public Interest Disclosure Statement (“Whistleblower”)

If an individual is concerned about consequences associated with reporting a serious breach of this Policy, that individual should refer to the Whistleblower Policy available on The Zone or talk to their Leader.

Need to know more or have a question?

All Team members will have access to this Policy, underpinning policies and other supporting documentation on THE ZONE. Support and further information are available from your Leader or People Partner.

For further advice and guidance, please refer to the TasNetworks Probity Guideline.

4. Definitions

Term	Definition
Auditable	Documented in a way that allows decisions and actions to be reviewed, understood, and verified.
Client	Internal business area or person requesting goods, services, or works.
Confidential Information	Information that is not publicly available and must be protected from unauthorised access, use or disclosure.
Confidential Obligation	A requirement to protect confidential information from unauthorised access use or disclosure and to use it only for its intended purpose.
Conflict of Interest (COI)	A situation where a person’s private interests could influence, or be seen to influence, their decisions or actions. Conflicts may be actual, potential or perceived.
Contractor	A person or organisation engaged under a contract to provide goods, services or works.
Contract Lifecycle Management (CLM)	The systematic management of an individual contract throughout its lifecycle, including implementation, obligations, performance, compliance, change, renewal and close-out. CLM requirements are established during sourcing and confirmed through contract handover.
Customer	A person, business or organisation that receives goods, services, work or outcomes from the organisation.
Defensible Position	A decision that is supported by evidence, follows approved processes and can be explained if reviewed or challenged.
Delegated Authority or Delegate	A position authorised under the TasNetworks Delegations Framework to make specified decisions and commit TasNetworks within defined limits. Delegated approval is separate from Supply Chain endorsement, business ownership, evaluation participation and process accountability.
End to End Sourcing	The process from confirmation of a business need through sourcing strategy, scope or specification development, market engagement, evaluation, negotiation, approvals, contract execution and handover. Strategic Sourcing is a discipline applied within this process.

Term	Definition
Ethical Conduct	Acting honestly, fairly and in accordance with organisational values, policies and legal obligations.
Governance	The framework of rules, responsibilities and processes that supports effective, ethical and accountable decision making.
Other Probity Risk	Any circumstance, behaviour or event that could compromise, or be perceived to compromise the fairness, integrity, transparency or accountability of a supply chain activity.
Probity	Evidence of an ethical, fair, transparent and defensible procurement process. It requires conflicts and bias to be identified and managed, suppliers to be treated equitably, information to be protected and decisions to be documented. Evaluations must use approved criteria and evidence from submissions, approved clarifications and documented due diligence. Personal or undisclosed historical knowledge must not influence the evaluation.
Probity Advisor	An independent person who provides advice to help ensure supply chain activities are conducted fairly and in line with probity requirements.
Procurement	The governed process that converts an approved business need and any relevant Category Strategy into an approved supply arrangement or contract for goods, services or works. It must be fit for purpose, commercially sound, fair, transparent and aligned with value-for-money, risk, probity and governance requirements.
Procurement Exemption (or Process Departure)	Prior, evidence-based approval to depart from the normal procurement pathway or a mandatory control due to justified circumstances such as genuine urgency, sole or restricted supply, compatibility, standardisation or an approved strategic requirement. It cannot be approved retrospectively and does not remove contract, risk, probity, Value for Money or delegation requirements.
Procurement Lifecycle	The stages of procurement identifying a need through to contract completion or disposal.
Procurement (Major)	Procurements valued at over \$1,200,000 (TOC) and/or increased value, complexity, sensitivity, risk or potential scrutiny.
Procurement (Minor)	Procurements valued at between \$200,000 and \$1,200,000 (TOC).
Purchasing	The transactional buying process that raises and manages requisitions and purchase orders, purchases under approved contracts, panels, catalogues or supplier arrangements, and supports receipting, invoice matching and payment. Purchasing executes an approved pathway and does not replace procurement planning or sourcing.
RFx	The collective term for a Request for Information, Expression of Interest, Request for Quotation, Request for Proposal or Request for Tender, including the associated conditions, specifications and response schedules.
Sensitive Information	Information that could cause harm to the organisation, suppliers or the public if accessed, used or disclosed without authorisation.
Strategic Sourcing	A disciplined, cross-functional approach used where value, risk or complexity warrants. It analyses demand, spend, markets, suppliers and risk to select and execute a sourcing approach that delivers sustainable commercial and operational value.
Supplier	A person or organisation that provides, or may provide goods, services or works.
Supply Chain	The end-to-end business function that enables TasNetworks' operational, capital and corporate delivery through coordinated category management, sourcing, procurement, purchasing, contracting, supplier management, materials, inventory, warehousing and logistics. It ensures required goods, services and materials are available when needed under appropriate commercial, governance, risk and operational controls.

Term	Definition
Supply Chain Activities	The acquisition and management of goods, services and works including RfX and day to day purchase order raising.
TasNetworks Group	Means TasNetworks and its subsidiaries, TasNetworks Holdings Pty Ltd, Fortytwo24 Pty Ltd, and TasNet Connections Pty Ltd.
Total Cost of Ownership (TCO)	The total cost of acquiring, implementing, using, supporting, maintaining, transitioning and disposing of goods, services or a solution over its useful life. It is used to compare options and assess Value for Money and is separate from contract value.
Value for Money (VfM)	The optimum overall outcome, not necessarily the lowest price, based on a balanced assessment of financial and non-financial factors. These include fitness for purpose, whole-of-life cost, quality, delivery, service, support, risk, sustainability and TasNetworks' broader business and community objectives.
Vendor	Alternate term used to describe a Supplier.

5. References

This policy has been prepared in consideration of the following publicly available frameworks and guidance:

No.	Source / Reference (Hyperlink Provided)
1	Australian Government Department of Finance (Ethics and Probity in Procurement)
2	Department of Treasury and Finance (Tasmania)
3	Tasmanian Government Purchasing
4	Tasmanian Government Purchasing (Probity Guidelines for Procurement)
5	CIPS - Leading global excellence in procurement and supply

6. Related Policies and Procedures

All team members are responsible for complying with this Policy, and any breaches of this Policy will be treated seriously and may result in disciplinary action being undertaken.

Ref Id	Record (in known)	Document Title
1	R0000640496	Code of Conduct (2024)
2	R0000000156	Whistleblower Policy
3	R0000000425	Fraud and Corruption Control Policy
4	R0002924812	Fraud and Corruption Control Framework
5	R0001399286	Conflict of Interest Policy
6	R0002726299	Supply Chain Policy
7	R0002726374	Responsible Procurement Policy

Ref Id	Record (in known)	Document Title
8	R0002043337	Responsible Procurement Standard
9	R0000465632	Probity Policy
10	R0000465631	Probity Guideline
11	R0000000150	Information Management Policy
12	R0000000223	Privacy Policy
13	R0000483756	Gifts, Benefits Policy
14	R0000483756	Delegations Framework
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7. Administration of this Policy

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6.0	New policy (incorporates elements of the previous Probity Policy)	Peta Rumble Shaun Heather Dwayne Heffernan	ELT	18/09/2026

Appendix 1

Not Applicable.



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