

## CODE OF CONDUCT POLICY

### Contents

1.	Purpose .....	1
2.	Scope.....	2
3.	Roles & Responsibilities .....	2
4.	Definitions .....	2
5.	Legislative Context .....	2
6.	Policy Statement.....	3
7.	Summary of our standards .....	3
	Behaving honestly.....	3
	Ensuring merit .....	3
	Respect and courtesy .....	4
	Equity.....	4
	Diversity and inclusion .....	4
	No discrimination .....	5
	Bullying and harassment .....	5
	Professionalism.....	6
	Dress Code .....	6
	Attendance and punctuality .....	6
	Conduct in public.....	6
	Managing people.....	7
	Decision making.....	7
	Performance.....	7
	Use of company property and equipment .....	7
	Use of Internet at work .....	8
	Use of Social media .....	8
	Media Comment .....	9
	Public Comment .....	9
8.	Reporting unacceptable or unlawful behaviour.....	9

## 1. Purpose

Our Code of Conduct (the Code) outlines the standard of behaviour expected of employees of CGH Group. It is designed to assist employees to understand their responsibilities and obligations and provide guidance on expected behaviour in the workplace.

The Code does not seek to encompass all possible scenarios arising in employment with CGH Group however, it provides a set of standards to guide employees on acceptable and unacceptable behaviour.

The Code should be read in conjunction with any applicable legislation, policies and procedures.

## 2. Scope

This policy applies to all people; directors, officers, managers, employees, field employees and contractors who work with CGH Group whether fulltime, part time or casual.

## 3. Roles & Responsibilities

### For everyone:

- Compliance with our Code of Conduct is mandatory.
- You are personally responsible for your own conduct in complying with all of the provisions of the Code.
- You are personally responsible for reporting known or suspected breaches of this Code of Conduct to your manager.

### Managers and those in higher positions:

If you are a manager, supervisor or someone in a trusted position, you should note that CGH Group holds you to a higher standard.

CGH Group expects you to not only comply with the Code yourself, but to set an example for others, serving as a role model and ensuring that there is a positive culture of integrity and ethics throughout CGH Group.

You will also act as a resource in educating employees about the Code and expected standards of behaviour as well as respond to questions about the Code and how it applies.

## 4. Definitions

**Stakeholders** – Clients (actual and prospect), Candidates (field employees and applicants), Contractors and Suppliers

## 5. Legislative Context

- Human Rights and Equal Opportunity Commission Act
- Fair Work Act
- Privacy Act
- Disability Discrimination Act
- Age Discrimination Act
- Racial Discrimination Act
- Sex Discrimination Act
- Employment Opportunity for Women in the Workplace Act
- Work Health & Safety Act

Please note this list is not exhaustive

## 6. Policy Statement

Our Values, Safety - Integrity - Respect -Fairness & Honesty guide how we behave towards each other, our stakeholders and the wider community.

The Code of Conduct confirms our commitment and is designed to promote a culture of fair, respectful and ethical behaviour and to ensure CGH Group meets its obligations under state and commonwealth legislation.

The Code will assist CGH Group to ensure trust and confidence in the integrity and professionalism of its employees by ensuring that all employees:

- maintain appropriate standards of conduct;
- exhibit fairness, impartiality, honesty and equity in decision making; and
- foster and protect the reputation of the CGH Group.

## 7. Summary of our standards

CGH Group has the following standards, which you must adopt at all times:

### Behaving honestly

You are expected at all times to be honest, fair and truthful in performing your duties.

Honesty and integrity also applies to things we do not do, for example, if we see dishonesty in others and do not report it, this will reflect on your own honesty and integrity.

You must never attempt to deceive or mislead others, either by your conduct or your silence.

### Ensuring merit

You must ensure that merit principles are applied in any selection or promotion process in order to select the most suitable applicants with the knowledge, skills, attributes and experiences as these relate to the requirements of the position.

*Refer to the Recruitment Policy*

## **Respect and courtesy**

Respect is about how you treat other people.

Your team members and stakeholders are entitled to receive respect and courtesy and it is expected that you show regard for the dignity of the people with whom you interact.

Conversely, you can reasonably expect to work in an environment that promotes respect for one another and shows regard to the sensitivities of people within the workplace.

## **Equity**

Equity in a workplace means everyone receives fair treatment.

When equity exists, people have equal access to opportunities.

It does not necessarily mean treating everyone in the same way. You may need to treat a person differently according to their circumstances and needs, in order to give them an equal chance in comparison with others.

For example, an online induction or electronic forms may inadvertently disadvantage people who are unable to access the internet or who are sight impaired.

It is your responsibility to ensure that your service and activities are inclusive and responsive to all groups.

## **Diversity and inclusion**

An important part of respecting others is valuing diversity and demonstrating inclusiveness.

Diversity describes the differences and uniqueness of all people whether it be their;

skills, knowledge, experiences, age, gender identity, sexual orientation, religion, nationality, or personal characteristics such as disability, medical condition, carers' responsibilities or any other characteristic of an individual.

Some personal characteristics are protected against discrimination through state and commonwealth legislation; however valuing diversity is broader, where differences are recognised and valued in a positive and proactive way

An inclusive workplace:

- values the diversity of its employees and stakeholders
- upholds the right of every employee to be treated with respect and fairness whilst performing their work
- is fair and equitable
- is free of discrimination, harassment, bullying and other unlawful behaviour.

A diverse and inclusive workplace culture benefits everyone and facilitates more creative, innovative and effective service delivery.

It is your responsibility to promote diversity and inclusion in the workplace

**No discrimination**

Discrimination, directly or indirectly, in your treatment of individuals or groups on the grounds of age, gender, race, disability, sexuality, marital status, pregnancy, or any other ground covered by equal opportunity or other anti-discrimination legislation is unlawful.

For example, discrimination includes treating a candidate in a job selection process less favourably because of a characteristic or circumstance that has no bearing on their capacity to perform the job for which they've applied for.

Discrimination in any context is not acceptable and will not be tolerated.

It is your responsibility to ensure that your service delivery and activities are free from any real or perceived discrimination.

*[Refer to the Equal Employment Opportunity Policy](#)*

**Bullying and harassment**

You must not engage in bullying or any form of harassment, including sexual harassment.

Behaviours that characterise bullying are repeated unreasonable acts that create a risk to health and safety, including victimisation and unwelcome, offensive, abusive, belittling or threatening behaviour directed at another person or a group of people.

Bullying may lead to the person or group of people subjected to the behaviour feeling victimised, offended, demeaned, humiliated, intimidated, or suffering detriment or disadvantage.

Harassment is any unreasonable, uninvited or unwelcome behaviour that a reasonable person would consider offensive, humiliating, intimidating or threatening to another person or makes a workplace uncomfortable and hostile for other employees

Sexual harassment is unreasonable, uninvited or unwelcome conduct of a sexual nature that makes another person or group of people feel offended, humiliated or threatened.

Sexual harassment may include conduct that occurs in the workplace or in connection with work outside normal hours, for example, at a work function.

Managers and team members must take action to address and prevent bullying and harassment.

Behaviour that amounts to bullying or harassment may be an offence under the Work Health & Safety legislation, and, in some circumstances, can also be the subject of criminal and/or disciplinary proceedings.

[Refer to the Harassment and Bullying Policy](#)

### **Professionalism**

Commitment, responsibility and dependability, honesty and ethics, appearance and professional presence are all central to demonstrating professionalism.

You should always strive to honor your commitments, demonstrate a good work ethic and maintain constructive relationship and you are expected to perform any duties associated with your position diligently, impartially conscientiously and to the best of your ability.

### **Dress Code**

While CGH Group employees are not required to wear what is traditionally considered formal business attire, appropriate standards of professionalism and presentation must be followed.

You are expected to maintain a clean and neat appearance at all times, dressing in a manner appropriate for the work being performed and consistent with safety rules and considerations.

### **Attendance and punctuality**

Absenteeism and tardiness burden your colleagues and can have a negative effect on our ability to provide quality service to stakeholders.

You are expected to be regular and punctual in attendance. This means being in the office, ready to work, at starting time each day.

If you are unable to work due to personal illness, caring responsibilities or family emergencies you must personally notify your manager as soon as practicable and before the start of work.

If you do not report for work and we are not notified of your situation for 3 days despite our attempts to contact you, we may be justified in determining that you have abandoned your employment.

[Refer to the Leave Policy](#)

### **Conduct in public**

You are required to conduct yourself in a manner that will not embarrass or reflect unfavourably on CGH Group and at all times behave in a way that upholds our values and the good reputation of CGH Group.

This includes your actions in public whether working or not. For example, you should still behave to the same standard if you are at an office social function after work hours.

## **Managing people**

If you manage employees, it is expected that you effectively support them in executing their duties to the best of their abilities.

This means providing clarification of their role, responsibilities and accountabilities; ensuring they have the resources to do their jobs effectively; that their workplace is healthy and safe; that they receive regular feedback about their performance and the opportunity to grow and develop their skills, knowledge and abilities.

## **Decision making**

Effective decision making takes into account the needs of people both now and into the future, integrating social, environmental and economic factors.

Your decisions can affect other team members, stakeholders and the wider community and, therefore, must be fair and consistent.

This means that all your decisions are honest, based on the relevant information, justifiable and understandable both by those who are affected by the decisions and those who may need to review the decision.

## **Performance**

Our stakeholders expect CGH Group to provide responsive, effective and efficient services.

Performance management plays a key role in helping you to achieve these expectations and the requirements of this Code of Conduct.

Performance management supports fair and equitable management of team members and aims to build a competent and high performing organisation that is continuously improving its performance in delivering services.

## **Use of company property and equipment**

Employees need to be mindful that all equipment issued to them to perform their jobs is owned by CGH Group.

You are responsible in caring for and safeguarding company property and equipment, keeping it in as close to as new condition as possible.

Examples of company property includes motor vehicles, furniture and fittings, computer, printers and photocopiers, mobile phones etc.

You must report damaged or defective property and/or equipment to your manager as soon as practicable and ensure that where the damage or defect is a danger to health and safety, action is taken to protect others from danger.

Any theft or loss of CGH property and/or equipment must be reported to your manager within 48 hours. If the item(s) have been stolen, you will be required to file a report with the Police.

### **Use of Internet at work**

Internet usage is not restricted however it must not interfere with your productivity or disrupt or damage CGH's computer network.

It is strictly forbidden to download video, music files, games, software files and other computer programs for non-work purposes.

Many Internet sites that contain "unacceptable" content are blocked automatically by our systems. However, it is not possible to block all "unacceptable" sites and you should not deliberately view, copy or circulate any material that:

- is sexually explicit or obscene
- is racist, sexist, homophobic, harassing or in any other way discriminatory or offensive
- contains material for which possession would constitute a criminal offence
- promotes any form of criminal activity
- contains images, cartoons or jokes that are likely to cause offence.

*[Refer to the Acceptable Use Policy](#)*

### **Use of Social media**

You should always be mindful that whatever you post on social media can be in the public domain and shared for a long time.

Employees should use their best judgment in posting material that is neither inappropriate nor harmful to CGH Group, our employees, our clients or stakeholders.

Although not an exclusive list, some specific examples of prohibited social media conduct include posting commentary, content, or images that are defamatory, pornographic, proprietary, harassing, libelous, or that can create a hostile work environment.

You must not to publish, post or release any information that is considered confidential or not for public knowledge.

If you find yourself, while using social media, in a position that threatens to become antagonistic, you should disengage from the dialogue in a polite manner and if work related report it to your manager.

*[Refer to the Social Media Policy](#)*

## Media Comment

You must not initiate contact with the media unless authorised by CGH Group's Chief Executive Officer or Chief Operating Officer.

Likewise any media requests or enquiries must be directed to your General Manager who will liaise with the Chief Executive Officer or Chief Operating Officer to ensure CGH Group's response is accurate and consistent.

Employees must not attempt to respond or provide comment directly to the enquiry under any circumstances.

Only spokespeople approved by the Chief Executive Officer or Chief Operating Officer shall be interviewed by media outlets.

[Refer to the Media Policy](#)

## Public Comment

CGH Group respects the right of employees to participate in political, advocacy, and community activities.

In doing so, however, employees must behave in a way that does not seriously call into question their capacity to act apolitically and impartially in their work.

It is also important that the reputation of CGH Group is not placed at risk by comments that you make.

We expect you to take reasonable steps to ensure that any public comment you make, including online, falls within these parameters.

You can generally make public comment in a personal or private capacity if the comment is lawful and isn't, or couldn't reasonably be perceived to be:

- being made on behalf of CGH Group, rather than an expression of a personal view
- compromising your capacity to fulfil your duties in an impartial manner
- harsh or extreme criticism of CGH Group
- prejudicial to the integrity or good reputation of CGH Group

## 8. Reporting unacceptable or unlawful behaviour

You have a duty to report any breach of this Code, or where in good faith you suspect a breach of the Code.

It is not acceptable to turn a blind eye to others breaching the Code of Conduct.

In most cases it will be appropriate to bring suspected misconduct to the attention of your direct report or line manager.

If the line manager is involved in the matter, the report can be made to the general manager or another senior employee for example the HR manager.

Any reported breach will be investigated: some may be formally investigated.

CGH Group's process for addressing unacceptable and unlawful behaviour in the workplace upholds the principles of procedural fairness.

All concerns are treated in confidence, and with the complete assurance that there will be no retaliation against anyone filing a complaint in good faith.

A breach of this Code of Conduct will constitute a valid ground for disciplinary action, including dismissal from employment for serious misconduct where appropriate.

Any retaliation or threat of retaliation against any person for refusing to breach this Code, or for reporting in good faith a breach or suspected breach of the Code will not be tolerated, and is itself a breach of the Code. It may also be a breach of one of several laws that prohibit victimisation.

No-one—whether a manager, supervisor, colleague, client, candidate—has the authority to order, request or influence you to breach this Code.

You will not be excused for a breach because someone asked you to, or told you to, act in way that breaches this Code.

Where the breach also constitutes a breach of a law, CGH will cooperate with the appropriate law enforcement agency (for example, the Police, or the Work Health and Safety authority) and you may thus also face prosecution if the breach is also an offence.

If you are in any doubt as to appropriate conduct, you should ask your manager, the Human Resources Manager, or the Compliance Manager.

Rob Blenkinship

CEO