

What is our Policy?

The Code of Conduct outlines the standard of behaviour expected of the board, employees and contractors at Estia Health Limited ACN 160 986 201. It is designed to assist employees and contractors to understand their responsibilities and obligations and provide guidance on expected performance, behaviour and ethical standards in the workplace, as well as on social media.

Why is this important?

The Code of Conduct provides general guidance as to the standards of work performance, ethical standards and behaviour required.

Our Code

Creating Happiness

We make magical moments happen, in small and special ways.

Always Approachable

We make time to listen because we care.

Taking Responsibility

We do our best to make a difference, every day.

Embracing Diversity

Celebrating differences.

Growing Together

We challenge ourselves and inspire others.

Purpose of this code

The Company is committed to and strives to act honestly and with integrity in all its dealings and to act ethically and responsibly. This code of conduct sets out the values, commitments, ethical standards and policies of the Company and outlines the standards of conduct expected of our business and people, taking into account the Company's legal and other obligations to its stakeholders.

The Board of Directors of the Company ("Board") has endorsed approved this code. The Board and management believe that the Company's commitment to this code will maintain the confidence of the Company's key stakeholders in the Company's integrity.

Scope and Application of this code

This code applies to all directors of the Board, as well as all officers, employees, contractors, consultants, other persons that act on behalf of the Group, and associates of the Group.

You are expected at all times to act consistently with the values, commitments and ethical standards as set out in this code of conduct. This code operates in conjunction with the Company's policies and procedures relating to you.

It is essential that each of you are familiar with this code, which is available on the Company's website. Naturally, this code cannot cover every circumstance that you may face nor can it address every law, regulation or company policy that may apply to you. You are encouraged to obtain copies of the policies, standards and procedures relevant to your work. If you have any questions about your obligations or about the Company's expectations, please speak with your manager or the Company Secretary.

Employees and Contractors

All Estia Health Employees and Contractors are asked to understand and abide by this Code of Conduct, including, but not limited to:

- Treat residents, clients, visitors and fellow colleagues with respect and courtesy;
- Speak to our residents in English or in the language that the resident or residents' representative understands;
- Refrain from using obscene and/or offensive language in the workplace;
- Provide all necessary and appropriate assistance to residents, families and visitors. Always be approachable;
- Provide information and assistance promptly, accurately, as fully as possible and in a form that can be understood;
- Treat everyone equitably, without prejudice or bias;
- Keep all matters relating to residents, their families, colleagues, our homes or Estia Health confidential;
- Report to your Manager any cases of unethical behaviour or wrongdoing by any other employee or contractor. If you see something, say something;
- Do not accept gifts of any kind, that are offered by residents, contractors, potential employees and external providers, or any other individual or organisation, no matter the value, at any time;
- It is expected that contact and conduct with residents and/or their families is limited to a professional nature only;
- Do not share personal mobile numbers or contact details with residents and/or their family members;
- Upon leaving employment at Estia Health, if an employee/contractor wishes to continue to visit a resident, the resident's permission must be obtained through the Executive Director. If the resident is not able to consider such a request, this request should be made to the resident's next of kin. Estia Health retains the right to refuse entry to any visitors, including former employees, for any reason;
- Actively discourage harassment in any form;
- Use the resources available wisely and efficiently, without wasting or using them for personal reasons;
- Comply with all policies, legislative and administrative requirements;
- Comply with all occupational health and safety policies, regulations and requirements and bring any potential hazard to the attention of management; and
- Keep up to date with advances and changes in your work area and maintain any necessary qualifications and/or registration(s).

Compliance

Employees must comply with all governing legislation, standards and codes of practice at all times.

Personal Behaviour

Employees are expected to:

- Always behave in a manner that is respectful to their colleagues, residents, visitors and others; including refraining from using obscene or offensive language;
- Comply with all aspects of the law;
- Ensure their daily attendance is recorded;
- Provide advance notice of absence from work and seek approval for that absence;
- Work to the best of their ability in the discharge of their duties during the hours of work;
- Conduct their personal business in a manner that does not interfere with their duties, outside working hours and outside the workplace;
- Comply with Estia Health's smoking policy including not smoking within and around building premises. If employees choose to smoke, smoking is only permitted in allocated work breaks; and
- Dress in accordance with Estia Health's uniform policy or other relevant dress codes.

Equal Opportunity and Non-Discrimination

Every employee and each Estia Health home must comply with equal opportunity legislation and Estia Health policy; including:

- Sexual harassment is not permitted under our policy and is illegal;
- Any employee/contractor who reports any cases of wrongdoing or unethical behaviour will be protected; and
- Any breaches may be subject to the Grievance, Disciplinary and Misconduct policy and may result in disciplinary action and/or the termination of employment.

Conflicts of interest

A conflict of interest occurs if your loyalties are divided, for example if you or your family or friends have a personal or commercial interest which may interfere, or be perceived to interfere, with the performance of your duties and responsibilities to the Company, making it difficult to perform your role objectively and effectively. The existence of a conflict of interest is not uncommon. What matters is how we manage the conflict.

You must act in the best interests of the Company. To safeguard the confidence of the Company's key stakeholders in the Company's integrity, it is paramount that you do not allow personal interests or the interests of family or friends to conflict with the interests of the Company. You must avoid participating in decisions and activities which may conflict, or be perceived to conflict, with your duties and responsibilities to the Company.

You must not enter into any arrangement or participate in any activity that would conflict with the Company's best interests or would be likely to negatively affect the Company's reputation.

You must not be involved in any other company or business or organisation as Director, agent, employee or consultant, whether paid or unpaid, if there is a possibility that your personal interests could conflict, or be perceived to conflict, with those of the Company unless you obtain approval first from your manager or the company secretary or the Board (if you are a Director).

If you are involved in a conflict or possible conflict, or become aware of a conflict, you must tell your manager or the company secretary or the Board (if you are a Director) as soon as possible.

Opportunities, benefits and ownership of work

You must not use Company or customer property (including intellectual property), or information, your position or opportunities which arise from these to improperly gain benefit for yourself or for another party or to cause detriment to the Company or its customers.

You have an obligation to avoid all financial, business and other arrangements which may be opposed to the interests of the Company, or which may place you in a competitive position with the Company.

The product of any work performed while you are with the Company, or on behalf of the Company, or using Company property (including all intellectual property rights created in connection with that work) belongs to the Company.

Anti-bribery and gifts

A number of countries, including Australia, have strict laws against bribery and corruption. The anti-bribery laws of some countries including Australia, the United States and United Kingdom can apply to things done in other countries (i.e. wide-reaching extra-territorial effect). We must comply with and uphold all laws against bribery, corruption and related conduct applying to the Company in all the jurisdictions where the Company operates.

Accordingly, the Company has a strict policy not to offer secret commissions or bribes to further its business interests. Depending on the circumstances, facilitation payments may breach anti-bribery laws.

Naturally, you must not accept any money or opportunity or other benefit which could be interpreted as an inducement, secret commission or bribe. Care must be exercised in accepting hospitality, entertainment or gifts over and above that required for the normal conduct of business or which may compromise your impartiality.

We are committed to adopting effective systems to counter bribery and related improper conduct and to monitoring and enforcing these systems. From time to time, we may issue further guidance regarding what is acceptable in the normal course, what you can do with senior manager or Board approval and what is prohibited.

You may also seek further information or clarification from your manager, the company secretary, legal counsel, the Board (if you are a director) or other relevant advisor.

Dealings with politicians and government officials

All dealings with politicians and government officials which relate to the Company and its business activities must be conducted at arm's length and with the utmost professionalism, to avoid any perception of attempts to gain advantage or to improperly influence the outcome of an official decision.

You must not make any donation or other financial contribution to any political party or candidate for an election or sponsor any organisations (other than in a purely personal capacity) without seeking and obtaining prior approval from the company secretary.

Confidentiality

In the course of the Company's business, you will have access to business or personal information about the affairs of the Company, its clients, customers, employees, suppliers and our business partners. It may include business strategies, marketing and sales plans, competitive analysis, financial plans and forecasts, customer or employee information, supplier information and pricing. Each of the parties expects the confidential nature of the information they have given in good faith to be respected.

You must keep confidential information acquired while you are with the Company, or acting on behalf of the Company, confidential, even after you leave or cease your engagement with the Company. You must not access or request or make improper use of or transfer or disclose confidential information to anyone else except as required by your position or as authorised or legally required. If it inadvertently comes into your possession it should be returned immediately.

If you are required by an authority to provide confidential information which has not been otherwise authorised, you must notify the company secretary.

Privacy

You must respect and safeguard the privacy of personal information held by the Company regarding its clients, customers, suppliers, employees and others. If you have access to this information, you must ensure that it is collected, kept, disclosed, handled and used in a manner that complies with the Privacy Act 1998 (Cth), Australian Privacy Principles any other privacy and data protection laws that may apply and the Company policy on privacy. For more detailed information on your obligations, please see the Company's privacy policy.

Fair dealing

You must treat each other and all suppliers, competitors, clients, customers and other stakeholders fairly and with respect. You must act honestly and with high standards of personal integrity.

The Company is committed to ensuring a diverse work environment in which everyone is treated fairly and with respect and where everyone feels responsible for the reputation and performance of the Company. For further information, see the Company's Diversity Policy.

Applicants for employment are evaluated by the Company on merit in accordance with their skills, qualifications and abilities, and having regard to the Company's operational needs.

The Company is committed to ensuring the highest quality of service is provided to its customers and clients at all times. The Company makes decisions regarding suppliers and contractors on merit and a commercial basis.

The Company collects information about its competitors and others in a lawful manner.

Serious Misconduct

Employee conduct which may be actionable by suspension and subsequent termination of employment includes:

- Presenting for duty under the influence of alcohol or illegal drugs;
- Abuse of any kind of a resident, visitor and/or colleague;
- Sleeping whilst on duty;
- Theft of belongings of a resident, other colleague, or the home;
- Leaving work without permission;
- Smoking within or around a home/building premises, other than in specifically designated areas;
- Committing fraud/acting in a fraudulent manner;
- Placing the Home, residents, colleagues and/or other occupants at risk; including through the failure to comply with the health and safety requirements and/or other policies;
- The development, implementation, dissemination and use of any material; either hard copy and/or electronic, either in the workplace and/or private that would bring Estia Health and/or its employees/management into disrepute and/or legal compromise;
- Behaving in a manner which is/could be constituted as bullying and/or harassment; or
- Any other deliberate, reckless, negligent or careless act or conduct which may adversely impact the health and safety of residents, relatives, employees or other visitors at Estia Health, or which may cause other loss to Estia Health.

Social Media

Employees and Contractors are required to exercise good judgement when posting on social media.

Anything that is posted on social media should be considered published and visible to the general public. This includes posts/comments made via a personal social media account (e.g. personal Facebook account). Even if Estia Health is not directly named or mentioned, posts/comments may be easily traced back to the organisation.

Inappropriate use of social media includes (but not limited to):

- Conducting a private business under the Estia Health brand or Estia Health's social media presence;
- Using discriminatory, defamatory, abusive or otherwise objectionable language;
- Stalking, bullying, trolling or marginalising any individual or group;
- Accessing or uploading pornographic, gambling or illegal content, including extreme images of graphic or violent content or information regarding activity relating to firearms, bombs, terrorism etc;
- Accessing sites that promote hatred or extreme/fundamental beliefs and values;

- Political comments or affiliations which refer to Estia Health;
- Uploading information of a confidential nature, especially regarding Estia Health's services, business or clients;
- Hacking or attempting to infiltrate the systems of Estia Health or another organisation;
- Criticising or denigrating Estia Health, or other organisations, and our/their employees, volunteers or contractors;
- Activity that interferes with work commitments;
- Activity that uses excessive bandwidth, either uploading or downloading, within the Estia Health network; and
- Activity that brings Estia Health or the person's professionalism or ability to act in a professional manner into disrepute.

When Estia Health employees, volunteers or contractors are interacting on social media, whether in an official or personal capacity, the following guiding principles should be followed:

- I will be polite, considerate, kind and fair;
- I will always ensure my online activity does no harm;
- I will not denigrate Estia Health and its services;
- I will not represent any social media activity as an official Estia Health position;
- I will not post anything about residents or employees, or images thereof, without documented permission;
- I will not do anything that breaches my terms of employment;
- I will not knowingly post inaccurate information;
- I will acknowledge and correct mistakes promptly;
- If I am responding to others' opinions, I will do so in a way that is respectful and professional.

Definitions	<p>Social Media may include, although is not limited to:</p> <ul style="list-style-type: none"> • Social networking sites, for example Facebook, LinkedIn, Yammer, etc; • Video and photo sharing websites, for example Flickr, Snapchat, Instagram, YouTube; • Blogs, including corporate blogs and personal blogs, for example SharePoint; • Blogs hosted by media outlets, for example comments or 'your say' feature; • Micro-blogging, for example Twitter; • Wikis and online collaborations, for example Wikipedia; • Forums, discussion boards and groups, for example Seek, Google groups, Whirlpool; • VOD and podcasting, for example SoundCloud; • Instant messaging, SMS, MMS and email; and • Geo-spatial tagging, Foursquare, Facebook check-in, etc. <p>Employees are those people employed directly by Estia Health to conduct work in relation to Estia Health's conduct as a business and includes Full-time, Part- time, Casual employees, apprentices and trainees employed by Estia Health.</p> <p>Contractors refers to those people who conduct work in relation to Estia Health's conduct as a business but who are employed by a third party. For the purpose of this policy, this may include other workers, such as, but not limited to: Students (for example on placement or work experience) and Volunteers.</p>
Policy ownership	People and Culture
Authorised	Approved by the Board 12 May 2020 Subject to annual review
Revision History	Version 3
References	<i>Grievance, Disciplinary and Misconduct policy</i> <i>Workplace Health and Safety policy</i> <i>Diversity and Inclusion policy</i>