



Code of Conduct

AK-HR-Code of Conduct V4
Effective from: 4 February 2022

Last Reviewed: 4 February 2022

1. OBJECTIVES

The Code of Conduct places an obligation on all employees to take responsibility for their own conduct. The Angus Knight Group of companies (the Group) is committed to honesty, integrity and exemplary conduct. This Code of Conduct (the Code) sets out the standards of conduct and behaviour we expect and require of all our people, based on our values and the law.

This Code is designed to assist you in making ethical, honest and correct decisions. It defines how we do business, demonstrating our commitment to providing quality services and the conduct we expect of all people who work for the Group.

The Code provides a framework to guide employees in making decisions in their day-to-day work, as well as their dealings with customers, stakeholders, and colleagues.

2. PURPOSE

The purpose of the Group's Code of Conduct Policy is to provide you with a clear understanding of the standard of conduct expected when performing your duties as an employee, including in the delivery of Government services and supports.

3. SCOPE

This Code is applicable to all employees, contractors, and consultants of Angus Knight Pty Ltd and subsidiary companies.

This Code applies whenever you are identified as a representative of the Group, which is inclusive of the workplace, during working hours and may extend to periods outside the workplace or outside of standard working hours when engaged in activities for the purposes of or related to the Group and its business or for the purposes of or related to the employment/engagement with the Group.

4. DEFINITIONS

For the purposes of these standards and guidelines, the following definitions apply:

Employees: Permanent, temporary employees or employees of contractors.

Public Comments: Public speaking engagements, comments on radio, television, and/or social media, and expressing views in letters to newspapers or in books, journals or notices or where it might reasonably be expected that the publication or the comment will spread to the community at large. An employee on an external committee and not representing



the Group or an entity of the Group needs to identify whom they are representing.

Stakeholders:

Employees, clients, shareholders, individuals and organisations with whom the Group deals.

5. STANDARDS AND GUIDELINES

5.1 What we expect of you

All employees are required to comply with the Code of Conduct and are personally responsible for their own conduct in complying with all the provisions of this Code.

As an employee of the Group, you are expected to conduct yourself in a professional and courteous manner, fulfil your duties while maintaining the highest ethical standards, act with honesty, integrity, and fairness, and be accountable for your conduct.

You must:

- a) Comply with all relevant laws, policies, procedures, rules and regulations and lawful and reasonable requests and directions of the Group
- b) perform your duties with care and diligence, and seek to achieve excellence no matter what your role
- c) be accountable for your decisions and actions
- d) behave in a way that upholds the values, integrity and reputation of the Group
- e) understand and adhere to the Group's policies, procedures, legal and regulatory obligations.
- f) maintain confidentiality and not misuse any information entrusted to you
- g) treat customers, clients, suppliers, co-workers, and the public in a non-discriminatory manner with proper regard for their rights and dignity. In this regard, discrimination, victimisation or harassment based on a person's race, colour, creed, religion, national origin, citizenship, age, sex, sexual orientation, marital status, union membership or non-membership, mental or physical disability, or any other classification protected by law will not be tolerated.
- h) work as a team, respecting each other, and dealing fairly, honestly, and equitably with each other.

5.2 Complying with the Law

The Group expects that you obey laws and rules that apply to you or the Group at all times.

You must understand and follow the intention and the spirit of the laws that apply to you and your role and not seek to operate within 'grey' areas of the law or engage in conduct which may be unethical or contrary to the intention of the law.

While the law can be complex, ignorance of what the law requires is not an excuse or defence. You are ultimately responsible for understanding what laws apply to the work that you do. If you have any doubt about what is allowed you should ask your manager. You must not at any time involve the Group in any illegal conduct.

5.3 Professionalism

The Group expects you to respect, always value and maintain professionalism and in all circumstances you must:

- a) not engage in conduct likely to bring the Group into disrepute
- b) be punctual, trustworthy, reliable, flexible and demonstrate initiative
- c) maintain an appropriate, professional standard of dress and grooming
- d) use appropriate and professional language and remain respectful of others and their situations



- e) maintain professional relationships with colleagues and be aware of professional boundaries between yourself, other employees and clients
- f) comply with this Code in both letter and spirit.

5.4 Respecting Others

You must respect and be courteous to all individuals, respecting their culture, beliefs, and backgrounds. This applies to those in our workplace but also to our conduct towards our clients and to the general public.

Behaviour not tolerated includes:

- a) harassment
- b) bullying
- c) unlawful discrimination
- d) unfair treatment
- e) vilification
- f) violence, or
- g) victimisation.

The Group does not accept gossiping, abusive language, intimidating, hostile or derogatory conduct or remarks, unwelcome sexual advances or other conduct which is of a sexual nature whether verbal in writing or any other physical conduct.

5.5 Teamwork

We work as a team, respecting each other and dealing fairly, honestly, and equitably with each other. This means that you must behave appropriately with each other, respecting each other's views and ensuring that you comply with the Groups policies and procedures, including but not limited to the Group's Anti-Discrimination, Sexual Harassment and Bullying Policies.

Being part of a team means looking out for each other, lending assistance when workloads are heavy, and ensuring that our fellow workers are safe. You must cooperate with those in your team and when you are in supervisory position, not abuse your position by improper methods of management.

5.6 Confidentiality

You must respect confidentiality and not misuse information that has been entrusted to you. You will regularly handle information that is confidential. This may be information about the company, about other employees or our clients. You must not use this information in an improper way.

We regard protection of confidential information as vital, and we expect you to respect and honour confidential information, whatever its nature. Unless specifically authorised to do so, you must not release any confidential information relating to any information or material you have acquired as a result of being associated with the Group. This obligation continues even after your employment ends.

The Group collects, holds, uses and discloses personal information to carry out its activities appropriately and as required. We are committed to protecting the privacy, confidentiality and dignity of people accessing our services and for anyone else for whom we hold personal information. You must only collect personal information by lawful or fair means and not in an unreasonably intrusive way.

You must take reasonable steps to:

- a) ensure personal information we collect, use or disclose is accurate, complete, relevant and not misleading.
- b) protect all personal information we hold from misuse, loss and from unauthorised access, modification and disclosure.
- c) destroy or redact personal information if it is no longer needed nor required by law.



More details can be found in the AK-HR-Privacy Policy.

5.7 Respecting the Group

You must respect the Group in the way that you work and the way you treat the Group's assets.

In terms of our work, you will respect the Group by ensuring that you work to the best of your ability, devoting your working time to the task at hand.

You will respect the Group by making sure your public comments never disparage the company or its associates, e.g., partners, government funding bodies, etc. You will not put any material on any of your personal social media pages such as Twitter or Facebook that comments on the company or its associates. You will not make public comments where it is possible that your opinion will be attributed as an official comment of the Group. As a member of the community, you have the right to make public comment and enter public debate; however, there may be circumstances in which you should clearly indicate that your comments are being made in a private capacity to ensure that comments are not attributed to the Group.

5.8 Professional Boundaries

All employees must always maintain clear professional boundaries with clients. Employees must limit their contact with clients to that which would constitute the provision of a quality service.

An employee's interaction with their clients should always be of a professional nature and these boundaries must not be overstepped so that the relationship moves from a 'professional' one to become a 'personal' one.

Examples of going outside professional boundaries may be contacting the client outside of work and engaging in detailed discussions about your personal life with a client or romantic or sexual conduct involving a client.

Any contact outside of work duties with current or former clients, their family and/or friends (either intentional or coincidental), must be disclosed to your manager immediately. Such contact may include, but not be limited to telephone calls, text messages, emails, social media (i.e., Facebook, Twitter), face-to-face contact/meetings, requests for contact by a client or former client, etc.

5.9 Avoiding Conflicts of Interest

All employees owe a legal duty to act in the best interests of the Group in performing their duties. This duty is set out in their written contract of employment, but it is also an obligation imposed on all employees by the law.

In delivering our services and supports, employees must proactively manage perceived and actual conflicts of interest, by:

- declaring a conflict of interest as soon as possible
- consulting with a manager if there is any doubt whether a possible conflict exists or whether to declare it
- managing, documenting and reporting on individual conflicts as they arise.

More details can be found in the AK-HR- Conflict of Interest Policy and Procedure.

5.10 Non-compliance

You are expected to comply with the Code of Conduct and any suspected breaches may be investigated. Non-compliance with this Code may result in counselling and/or disciplinary measures up to and including termination of employment.

6. OBLIGATIONS

This policy is not intended to create any contractually binding obligation on the Group and does not form part of any contract of employment or other contract for engagements with the Group.

7. RELATED DOCUMENTS AND FORMS

- AK-HR-Privacy Policy
- AK-HR-Anti-discrimination EEO and AA Policy
- AK-HR-Conflict of Interest Policy
- AK-HR-Drug and Alcohol Policy
- AK-HR-Our People Policy
- AK-HR -Conflict of Interest Declaration

8. RESPONSIBILITY

Authorised by	Chief of Governance and Compliance – Anthony Parsons  4 February 2022
Effective From	4 February 2022
Responsibility	Chief People Officer is responsible for ensuring all managers, supervisors and staff are aware of this policy.

9. VERSION CONTROL & AMENDMENTS

This is Version 4

Logo updated: April 2024