



Employee Code of Conduct

IRT is committed to foster a workplace culture that delivers the highest standard of performance through our values of Integrity, Respect and Trust. The purpose of the Code of Conduct is to clearly outline the expected workplace behavior of all board members, employees, volunteers, students and contractors.

Introduction.

IRT Group has a mission to create communities where seniors achieve their optimum quality of life.

IRT Group pursues this mission with Integrity, Respect and Trust as its underpinning values. The IRT Code of conduct forms a critical component of the operating environment of the organisation and provides direction in its application and scope to all relevant people.

The IRT Code of Conduct is designed to provide all IRT employees, board members, volunteers, contractors, students and other affiliates with information to maintain the highest level of ethical and lawful standards of Integrity, Respect and Trust.

The IRT Code of Conduct provides a behavioural framework which informs the obligations and standards of behaviour expected by IRT Group board members, employees, volunteers, students, contractors.

This conduct relates to all board members, employees, volunteers, students and contractors. IRT has zero tolerance for behaviour that is inconsistent with the code of conduct.

Compliance Requirements	<ul style="list-style-type: none">• <i>Aged Care Act 1997</i>• <i>Retirement Villages Amendment Act 2018</i>• <i>Aged Care Quality Standards</i>• <i>Fair Work Act 2009</i>
--------------------------------	--

1. Purpose.

- Behaviorally demonstrate the organisations commitment to deliver on its Mission, Values and uphold responsibilities to governing law, consumers and our internal and external stakeholders.
- Ensure that the culture of the organisation and management strategies support a culture consistent with the mission of the organisation and pursuit of its strategic objectives.

2. Application & Scope.

The Code of Conduct applies to all employees, directors, trainees, students, volunteers and contractors while conducting business or other associated activities on behalf or related to IRT.

3. Getting Advice.

- Ask your manager for advice if needed. If your Manager is unavailable, you can also ask a site Manager.

2.71 IRT Employee Code of Conduct



- If the matter in relation to this code of conduct is unable to be discussed with a Manager, contact your divisional Head of People and Culture for your business area or use the Speak Up program
- Keep up to date with IRT policy and procedures relevant to your role, and always follow them.

4. Workplace Behaviour, Diversity & Equal Opportunity.

All people listed in section 2 of this document:

- Have a duty to uphold IRT's values of Integrity, Respect and Trust at work, work related events and when representing the organisation
- Have an obligation to protect the reputation of IRT Group and behave responsibly in the association with the organisations events, resources and brand
- Comply with the law, including but not limited to the Aged Care Act, Aged Care Quality Standards, Retirement Villages Rules of Conduct
- Are required to be tolerant and respectful of other people's differences
- Ensure you are professional at all times
- Are responsible for your actions and accountable for the outcome
- Treat people the way you would like to be treated with respect and courtesy
- Treat the customer with dignity and respect, support them to maintain their identity and make informed choices about their care and services
- Maintain professional working relationships and work together to remove obstacles and achieve common goals
- Contribute to the decision and support the outcome.

5. Breaches Of This Code.

- If you breach this code, or assist someone else to breach the code it will be investigated as per the Workplace Conduct Investigation policy
- If it is determined that a breach has occurred, IRT will address the behaviour in line with the circumstances of the individual case
- Outcomes of breaches that have occurred will vary depending on the circumstance and can range from coaching or disciplinary action, as per the Disciplinary Action Policy
- There are some breaches of this code that IRT considers as serious misconduct. Some examples are:
 - Bullying, harassment and/or discrimination
 - Serious Safety breaches
 - Corruption and/or Fraud
 - Attending work under the influence of alcohol or other illegal drugs

6. Off Duty Conduct.

If the conduct of an employee while off-duty directly and actively impacts on the interests of IRT, IRT may take disciplinary action.

Off-duty conduct that impacts on the interests of IRT means that it:

- Is likely to cause serious damage to the employment relationship for example dishonesty during a workplace conduct investigation concerning off-duty conduct, fines or other prosecution for unlawful behaviour which has a relationship to the requirements of the employees role
- Damages or has a propensity to damage IRT's interests such as the brand, image, compliance standards or consumer confidence; or
- Is incompatible with the employee's duties as an employee

In relation to IRT you must not publish material on Social Media or make public comment that is obscene, defamatory, threatening, harassing, discriminatory or hateful to IRT, its employees, its customers, competitors or other business partners.

7. Reporting In The Workplace.

All people listed in section 2 in this code have a duty to and are encouraged to report misconduct or an improper state of affairs or circumstances including conduct by IRT, its employees, volunteers, directors, officers, contractors, suppliers or any other person dealing with the organisation which:

- Is dishonest, corrupt, unethical or improper
- Is illegal or criminal (including theft, fraud, drug sale/use, violence or threatened violence, damage to property)
- Contravenes legislation or constitutes an offence
- Does not comply with IRT policies, procedures or practice
- Puts the safety of individuals at risk
- Represents a danger to the public or financial system

8. Workplace Health And Safety.

- Contribute to a safe working environment
- Keep your own and your team members personal wellbeing and safety in mind at all times
- Report hazards when you identify them

9. Privacy & Confidentiality.

- Maintain confidentiality in all business related interactions
- Make decisions regarding personal information of our customers in accordance with the IRT Privacy Policy

10. Management Of Information.

- Responsible to create complete, reliable and accurate records for business activity
- Records should be kept using the appropriate record keeping system where required

11. Conflicts Of Interest.

- All part-time and full-time employees are required to declare secondary employment with another business or their own which could lead to a real or potential conflict of interest or other major risks associated with secondary employment such as fatigue
- Report any gifts, benefits, and/or money you receive from customers, families, contractors or stakeholders to your Manager
- You must disclose and avoid any conflict of interest between your own private interests and the business interests of IRT. For example:
 - An employee who has a family member that sub-contracts to IRT
 - An employee who employs a family member or is connected to managing their family members' roster
 - A Home Care customer who asks an IRT employee for private Home Care services
- Employees must not continue to carry out a function or connection to a perceived or actual conflict of interest until the conflict is appropriately managed.

12. Company Resources.

- Company resources are not intended to be used for private use.
- Report any knowledge of misuse or theft of company resources.

13. Roles & Responsibilities.

Role	Responsibility
Policy Owner - EGM - People & Culture	<ul style="list-style-type: none">• Ensuring the currency and appropriateness of the policy to meet requirements.
Policy Monitor - P&C Business Partners	<ul style="list-style-type: none">• Ensure day to day implementation and compliance with policy.
Managers	<ul style="list-style-type: none">• Carry out their responsibilities according to this policy.
Employees	<ul style="list-style-type: none">• Carry out their responsibilities according to this policy.

14. Definitions;

In this Policy, words have the following meaning:

Term	Definition
Conduct	The manner in which a person behaves
Performance	The action or process of performing a task or function
Serious Wrong - Doing	<p>Conduct which:</p> <p>Is dishonest, corrupt, unethical or improper.</p> <p>Corrupt conduct adversely affects, or could adversely affect, directly or indirectly, the performance of functions or the exercise of powers in a way that:</p> <ul style="list-style-type: none"> • Is not honest or is not impartial; or • Involves a breach of the trust placed in a person holding an appointment either knowingly or recklessly; or • Involves misuse of authority through an employee's position for personal gain. For example, position information or material acquired in or in connection with the performance of functions or the exercise of powers of a person holding an appointment • is illegal or criminal (including theft, fraud, drug sale/use, violence or threatened violence, damage to property) • contravenes legislation or constitutes an offence • does not comply with IRT policies, procedures or practice • puts the safety of individuals at risk • Represents a danger to the public or financial system.
	<p>Fraud:</p> <p>A person who, by any deception, dishonestly:</p> <ul style="list-style-type: none"> • Obtains a benefit, or causes a loss, by deception or other means and may include at any period of time (but is not limited to): <ul style="list-style-type: none"> • Theft • Unlawful use of, or obtaining property, equipment, material or services • Causes a loss, or avoiding and/or creating a liability • Making, or using false, forged or falsified documents

2.71 IRT Employee Code of Conduct



Reportable Conduct	Misconduct or an improper state of affairs or circumstances including the conduct by IRT, its employees, volunteers, directors, officers, contractors, suppliers or any other person dealing with the organisation
Conflict of interest	Where an employee has a personal affair or private interest with respect to a function or person connected to the operation of IRT and there's reasonable likelihood or expectation of financial or other benefit or loss to the employee or associate of the employee.
Company resources	All IRT purchased inventory which includes (but is not limited to) food, medical supplies, information technology devices, personal protective equipment, office supplies.
Gifts / benefits	Any item, service, cash, prize, hospitality or travel, provided by a resident, client, applicant, supplier, potential supplier or external organisation, which has an intrinsic value and/or a value to the recipient, a member of their family, relation, friend or associate.