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## 2. Message from the Chair and CEO

IRT is committed to fostering a workplace culture that is supportive, kind and collaborative, where everyone is treated with dignity and respect.

Our Code of Conduct provides a common understanding of our purpose, our values and the kinds of behaviour expected of all of us when interacting with our residents, customers, suppliers, contractors and each other. Rather than being an exhaustive list of what to do (or not do), the Code acts as an ethical framework to guide us in making the right choices in how we behave

The Code should be read in conjunction with our policies and procedures, which detail how we go about our work, and our values, which are the basis for everything we do at IRT.

at work and when making work-related decisions.

In always acting with our purpose, values and the Code of Conduct in mind, we will be well placed to ensure that we are delivering on our promise to create communities where seniors achieve their optimum quality of life.

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Yours sincerely

Patrick Reid

Mike Halloran Chair

## 3. Our Purpose, Mission and Values

#### **Our Purpose and Mission**

IRT's purpose is to improve the lives of older Australians. We achieve this through our mission to create communities where seniors achieve their optimum quality of life.

Our purpose and mission drive everything we do at IRT. Delivering on our purpose and mission takes all of us. No matter what your role or location, our purpose and mission should guide the work you and your team do.

#### **Our Values**

**INTEGRITY -** we are open and honest **RESPECT -** we value each individual **TRUST -** we deliver on our promises

Working at IRT requires our employees to understand and support our values.

These three values and their associated behaviours are the basis for everything we do.

## 4. Overview of our Code of Conduct

#### What is our Code of Conduct?

At IRT we pride ourselves on being a purpose and values-driven organisation. Our Code builds on our values and sets standards that guide us in making the right choices in how we act, solve problems and make decisions.

It clearly sets out expectations and requirements of all those who work at IRT to help us make the right choices.

The Code of Conduct is not intended to provide specific guidance on every situation. It's a principle-based guide to help you answer difficult questions, promote a culture that embraces our purpose and values, and encourages you to speak up if you have any concerns.

Many of the principles outlined in our Code are underpinned by specific policies and procedures. To the extent there is any inconsistency, the relevant policy or procedure takes precedence over our Code.

#### Who does the Code of Conduct apply to?

The Code applies to all Directors, employees (whether full time, part time or casual), students, volunteers, consultants and all other persons engaged by or on behalf of IRT under a contract or otherwise. References in this Code of Conduct to 'You' or 'Your' are references to all such persons.

#### When does the Code of Conduct apply?

The Code applies to all work-related activities (including conferences, training and other events such as attending a work function or representing IRT at an external function). It applies during or outside business hours at all work locations, including when working from home or remotely.

It also applies to personal activities (including the use of communication devices and social media outside of business hours) to the extent this may impact IRT's workplace or working relationships.

## 5. Standards of personal and professional conduct

Integrity is an essential part of customer and resident confidence and you have a major role to play. You must behave in a way that is consistent with the values and principles outlined in the Code. You are responsible for your conduct and behaviour.

#### 5.1 Performing your duties

In performing your duties and other obligations you must:

- Uphold IRT's values of integrity, respect and trust
- Act professionally at all times, lead by example and encourage your colleagues to exercise similar personal and professional behaviours.
- Comply with the law, including but not limited to the Aged Care Act, Aged Care Quality Standards, and Retirement Villages Rules of Conduct.
- Comply with IRT's policies and procedures.
- Treat our residents and customers with dignity and respect, support them to maintain their identity and make informed choices about their care and services.
- Work to maintain professional working relationships and work together to remove obstacles and achieve common goals.



#### 5.2 Health, safety and wellbeing

Protecting the health and safety of our people is everyone's responsibility. IRT is committed to mental wellbeing and supporting an inclusive workplace where it is safe to speak up and harassment and bullying are not tolerated.

What we expect of you:

- Take all reasonable steps to protect your own safety and the safety of others in the workplace.
- Adhere to all relevant health and safety rules, policies, directives, procedures, processes, laws and regulations.
- Report any health or safety incidents, injuries or issues in accordance with applicable policies and procedures.
- Return to work as soon as you are medically fit to do so and cooperate and participate in all return-to-work processes to ensure IRT can meet its obligations to you and your colleagues to provide a safe workplace.
- Not engage in activities, language or conduct that could compromise the health, safety or wellbeing of others (including bullying or harassment).



## 5. Standards of personal and professional conduct

#### 5.3 Alcohol and drugs



As part of IRT's commitment to health and safety, you must not attend work or conduct work activities where your performance or actions could be impaired by drugs or alcohol.

Alcohol may be consumed at work-related functions, provided it is consumed responsibly and behaviour is always consistent with the code.

As per IRT's Alcohol and Substance Abuse Policy, if you are taking medication that could affect your ability to perform work safely, you must inform your Manager.

#### 5.4 Discrimination, harassment, bullying, violence and inappropriate behaviour

IRT is committed to providing a work environment free from unlawful discrimination, all forms of harassment and bullying. Violence, abuse or intimidation of any kind are also unacceptable and will not be tolerated.

This applies to all work-related activities and the use of any IRT equipment, whether during or outside your working hours or on or away from IRT premises. It also extends to the use of any communication devices and social media outside of work hours to the extent this may impact IRT, the workplace or working relationships.



You must avoid and prevent any form of bullying, intimidation or harassment towards a fellow employee, contractor, student or volunteer or any other IRT stakeholder.

Acts of discrimination, harassment, bullying and violence are often easily identifiable. However, inappropriate behaviour can take many forms and it is up to everyone at IRT to act if they see inappropriate behaviour occurring. Things to look out for include:

- Insensitive jokes or name calling
- Pranks or practical jokes
- Excluding or isolating people from conversations or activities
- Not being sensitive to other people's cultural values.

It is expected that you will familiarise yourself with the Harassment, Workplace Bullying and Workplace Relationships Policy.

#### 5.5 Theft and fraud



You must not knowingly commit, or be a part to, or be involved in, any theft or fraudulent activity.

Examples include:

- Theft of IRT or resident or customer assets (e.g. cash, computers, stationery, medications)
- Falsifying attendance records
- Unlawful use of, or obtaining property, equipment, materials or services.

## 6. Conflicts of interest

#### What is a conflict of interest?



Conflicts of interest can be actual, perceived or potential. A conflict of interest is:

- Actual when you could be influenced by your private interests when doing your job.
- Perceived when it appears that you may be influenced by your private interests when doing your job even if there is no actual or potential conflict.
- Potential when you may be influenced in the future.

Therefore, you are at risk of having a conflict of interest if there is even a perception that your personal interests (or the interests of people close to you) will conflict with your ability to impartially perform your work duties.

Conflicts of interest are also categorised as pecuniary and non-pecuniary.

#### Pecuniary conflict of interest

A pecuniary conflict of interest exists when a person has a financial interest or the capacity to make a financial loss or gain.

Pecuniary interests include shareholdings, superannuation, spouse/partner financial interests, gifts and hospitality, and property ownership.



#### Non-pecuniary conflict of interest

A non-pecuniary conflict of interest does not have a financial component.

It can arise from personal or family relationships, or involvement in sporting, social or cultural activities.



Some examples of conflicts of interest include:

- Having a second job that compromises your integrity or impacts on your ability to perform your duties and obligations with IRT
- Personal beliefs or attitudes that influence the impartiality of your advice or actions
- Using business information that you have acquired through IRT for personal gain

#### What should I do to manage conflicts of interest?

Because you are often the only person who is aware of the potential for conflict, you are responsible for identifying and disclosing any actual, potential or perceived conflict of interest.

Notify your Manager of all potential conflicts of interest and log the potential conflict of interest in the Code of Conduct Register via the IRT intranet.

## 7. Employment outside of IRT

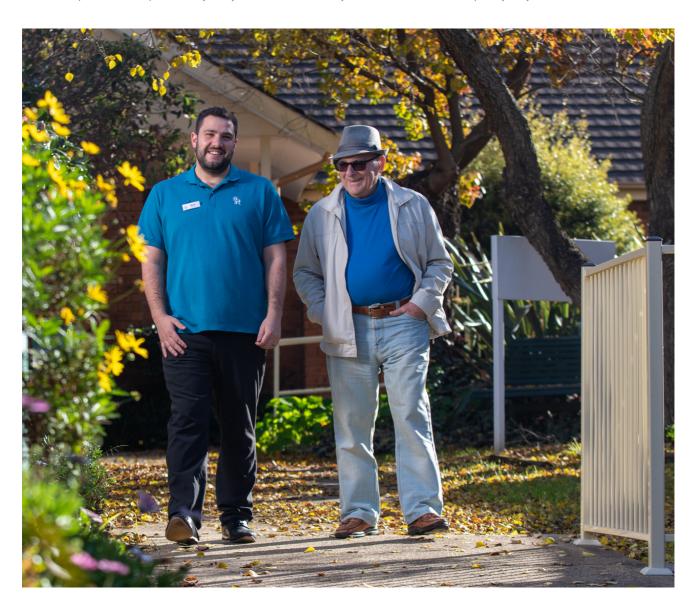
We are committed to ensuring that employees undertake their duties in a manner that presents no safety risks or conflicts of interest from other paid employment.

When employees are employed by IRT and another employer, this could lead to real or potential conflicts of interest. Other major risks associated with multiple employment include fatigue, misuse of resources, security of information, and availability for work.

All employees must declare if they work outside of IRT; this includes employment with another business, or their own business.

If you have a second job, while performing that second job you must:

- not use IRT's resources
- not share IRT's information
- be alert for any conflict of interest, real or perceived
- take personal responsibility for your fitness for duty and ensure that the quality of your work is not affected.



## 8. Acceptance of gifts, bequests and benefits

You must never solicit or request any gift, bequest or benefit for yourself or anyone else in connection with your employment or engagement, including from residents.

Offers of a gift, bequest or benefit made and refused must be reported to your manager.

If you receive an unsolicited gift, bequest or benefit in circumstances that you can not refuse it or it can not be returned, the gift, bequest or benefit must be registered and managed according to the Gifts, Loans and Bequests to Employees Policy.

### 9. Public comment



It is not appropriate for you to make public comment about, or on behalf of, IRT. This includes statements to the media and using all types of social media, unless authorised by IRT.



The use of social media is governed by our Social Media Policy.



Everything you share on social media is publicly available information and must align with the IRT values and our Code of Conduct.



Whenever you are associated with IRT through your clothing, badges or company vehicle, it is important that you conduct yourself as an ambassador for IRT.

## 10. Off duty conduct

Your conduct whilst off duty must not adversely impact the interests of IRT.

#### Off duty conduct that adversely impacts the interests of IRT includes:



- Conduct likely to cause damage to your relationship with IRT
- Conduct that damages or has the potential to damage IRT's interests such as the IRT brand, image, compliance standards or consumer confidence
- Conduct that is incompatible with your duties and obligations.

## 11. Privacy

#### Protecting personal information:

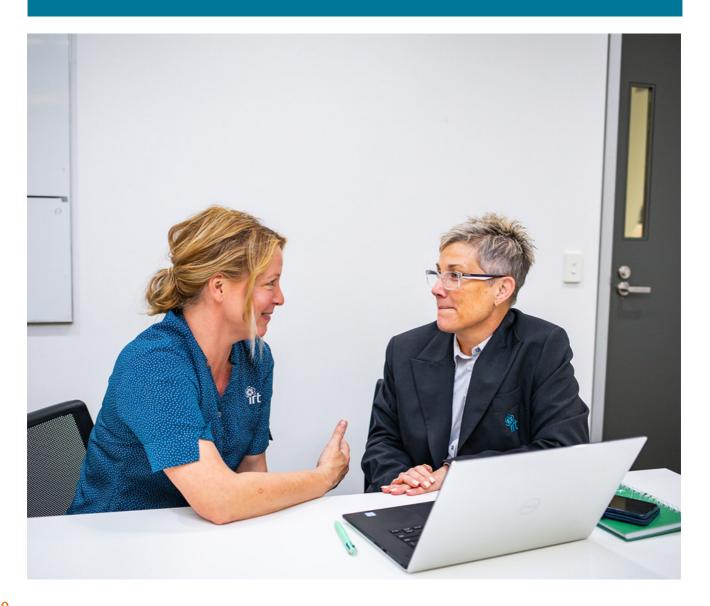
IRT is committed to ensuring that it only deals with personal and sensitive information in accordance with the Privacy Act's requirements for collecting, protecting and handling personal information.



We must protect personal and sensitive information of all individuals who engage with us, whether they be residents, customers, employees, volunteers, students, contractors or prospective employees. It is everyone's responsibility to ensure we meet these obligations by ensuring personal and sensitive information is protected at all times.

You must only collect, use and disclose personal information to the extent necessary to carry out your role and obligations and as is permitted by law. Ensure that you securely destroy or de-identify personal information when it is no longer required.

For further information and guidance, please refer to IRT's Privacy Compliance Policy.



## 12. Breaches of the Code

IRT is committed to the values, standards and principles outlined in this Code. IRT treats any breach of the Code seriously.

Breaches may lead to disciplinary action in accordance with the IRT Disciplinary Action Policy. This may lead to termination of employment and/or civil or criminal proceedings. Criminal matters will be reported to the Police and/or other appropriate law enforcement or regulatory bodies.

Some breaches of this code will be considered serious misconduct. These include:

- Bullying, harassment, discrimination
- Serious safety breaches
- Theft and/or fraud
- Attending work under the influence of alcohol or illegal drugs.

You are responsible for acting honestly and for disclosing any wrongdoing of which you become aware. If you are aware of any breach of this Code, consider speaking to the person(s) concerned, or if the matter is serious, escalate the issue to a manager or to People and Culture.

A copy of our Reporting of Wrongdoing Policy is located on the intranet. An employee can report any reportable conduct to an internal Disclosure Officer or to our external Disclosure Service. See our Reporting of Wrongdoing Policy and Reporting Wrongdoing Procedure for details on the process and definitions.



