

Code of Conduct

OUR WAY OF BEING

About this Code of Conduct

When you join the team at Australian Unity, you're also agreeing to follow a number of policies, procedures and regulations. Our Code of Conduct is part of that agreement. It's how we can ensure people right across our business are behaving in a way that's beneficial for our members, our customers, our people and Australian Unity as a whole.

The Code of Conduct and the policies and procedures that underpin it, must be read and followed. Together they provide us guidance on what we need to do to ensure we are acting legally, honestly, fairly and with skill, care and attention when performing our roles.

The Code of Conduct applies to all of us

It sets the standards of how we work across the entire company, whether you're an employee, director, contractor, consultant, or volunteer.

When do we need to follow it?

In short, whenever you're representing or associating yourself with Australian Unity and whether you're in the office, on-line, at a work function or volunteering on our behalf (including outside work hours).

The Code of Conduct also applies outside work if the conduct could impact Australian Unity, how you or others perform your duties or the working relationships between team members.

What happens if I don't follow the Code?

It depends on the situation. You might receive a warning, or in more serious cases, it may result in the termination of your employment.

You should read this Code together with the *We Are Accountable Policy, Consequence Management Framework*, and our Company policies which are designed to ensure that your actions and the consequences of those actions are consistent with our values, individual responsibilities, and legal obligations.

Our Code Principles

This document provides guidance on appropriate conduct in a range of circumstances – but of course, we can't predict everything. So, if something out of the ordinary happens, use the following principles to decide if it aligns with our Code of Conduct.

1. Consider your actions



Acting within our Code of Conduct means not only thinking about what you **can** do, but also, what you **should** do.

Keeping a simple checklist in the back of your mind is a practical way to follow the Code of Conduct. If you feel unsure about a situation, ask yourself:

Can we?

- i. Is it legal?
- ii. What are the potential consequences for Australian Unity, our customers, members, suppliers, co-workers and for me?
- iii. Is anyone's health, safety or wellbeing at risk or could it be considered abusive or neglectful?

Should we?

- i. Does it reflect our values of bold, warm and honest?
- ii. Is it the right thing to do?
- iii. If this conduct were reported in the media, how would it be received?
- iv. What would my family and friends think of this action or decision?

2. Do what's right



Always act professionally, ethically, legally and honestly.

Always:

- i. Keep a professional working relationship with our customers, members, and suppliers. Treat all with courtesy and respect.
- ii. Respect individual differences such as personal, cultural, ethnic, linguistic, gender, sexual orientation, and religious differences. Ensure you don't treat people less favourably because of these differences and that your actions are inclusive.
- iii. Be upfront with your people leader by fully declaring any criminal charges and convictions, or any external legal matters relevant to your role that you may be involved in.
- iv. Comply with all relevant checks in timely manner.
- v. Ensure all records are kept securely and are true and accurate — including records relating to our business, customers, members, and our people.
- vi. Follow all critical reporting requirements of your role — for example, operational incident reporting, health and safety incidents and other regulatory reporting requirements.
- vii. Complete all required training and make sure that your knowledge, qualifications, skills and experience meet the requirements of your role and the needs of our customers and members. If you are unsure about something, speak to your people

leader before acting.

- viii. Comply with all applicable Australian laws.
- ix. Comply with the requirements and spirit of all Australian Unity frameworks, policies, procedures, guidelines and directions.
- x. Remember: if you associate yourself directly with Australian Unity on social media (for example, by listing as your employer on Facebook or LinkedIn), people may attribute your personal opinions to the Company.

Never:

- i. Engage in behaviour that could be considered illegal, fraudulent or misleading.
- ii. Bully, harass or unlawfully discriminate against anyone.
- iii. Attend for work or perform work under the influence of alcohol, illicit drugs or any prescription drugs which may impact your ability to work safely.
- iv. Misuse Australian Unity property and resources.
- v. Disclose to others our confidential information unless authorised to do so.
- vi. Comment or respond to the media (or on social media) about matters concerning Australian Unity unless you're an authorised spokesperson.
- vii. Alter, destroy or remove company property or records, unless undertaken in the usual course of your duties and for a proper and authorised purpose.
- viii. Use company funds for, or become involved in, bribery, fraud or other corrupt activities.
- ix. Engage with organisations that do not align with our values, particularly those that may engage in unethical or exploitative practices.

3. Protect data, intellectual property, privacy and confidentiality



Protect people's personal information, and Australian Unity's data and intellectual property.

Personal information includes that of our customers, members, and employees. You must make sure that you deal with such information in accordance with our Privacy Policy (and related documents, such as Privacy of HRIS Information procedure) and protect this information by following all our information security policies.

We must also act in a way that protects Australian Unity's intellectual property. This includes confidential business information, copyright material, patents, trademarks, trade secrets and other intellectual property that belong to Australian Unity.

We must never use the intellectual property of our competitors, customers, or suppliers unless we have their permission.

We must take care to manage data (including a broad range of documents) so that it is appropriately stored and available to and by the organisation to further its objectives.

4. Stay safe and promote wellbeing



We all have a role to play in making our working environment safe and raising concerns if that's not the case. Make sure you follow any process, procedure or training that maintains a safe working environment.

We want everyone to stay safe and well (both physically and mentally).

Follow our policies and procedures, especially if you're doing physical work or providing services for our customers. You must not take on more than you're capable of, or are qualified to do. If in doubt, check with your people leader. Always report any health and safety incidents or concerns directly to your people leader as soon as practicable. Talk to your people leader if you have concerns about your physical or mental wellbeing.

5. Act with Integrity



Declare and manage Conflicts of Interest - Blurring the lines between personal and professional interests could affect decision making and the quality of service to our customers and members.

Always:

- i. Declare any close personal relationships with our suppliers or other Australian Unity employees that could lead to an actual or perceived conflict of interest on the [Conflict of Interest register](#). If you're unsure if there is a conflict, speak to your people leader or Risk and Compliance team for advice.
- ii. Report the receipt of any gifts or benefits in excess of \$300 on the [Gift Register](#), straight away.
- iii. Tell your people leader about any of your outside business interests, such as additional employment, partnerships, directorships or committee positions or business ventures. Check if they conflict with the interests of Australian Unity.
- iv. Complete the annual Conflicts of Interest Declaration if you are asked as part of your role, regardless of whether or not you have a conflict to declare.
- v. Comply with the requirements of securities trading restrictions.

Never:

- i. Influence the hiring process for a friend or family member beyond normal engagement in our employee referral program.
- ii. Exploit professional relationships for personal, material, or financial gain.
- iii. Use your position or non-public information you have become aware of in your role to obtain an advantage for yourself or someone else.
- iv. Accept gifts, benefits, or money from suppliers, potential suppliers, members, customers or their family members without your people leader's approval and never accept them if acceptance could create an expectation that will conflict with your work.

6. Speak up



Our people are supported and encouraged to speak up – no matter the situation. If you see something that is not right, report it as soon as possible.

If you are concerned about something, speak to your people leader or People & Culture. If the matter relates to illegal or unethical behaviour you can also report it to a Whistleblower Protection Officer or via our Whistleblower hotline 1300 794 250. We will ensure that any Whistleblower report is kept confidential and that you are protected.

Speaking up also means that you may need to report any potential risks or incidents in accordance with our Incident Management and Health and Safety Management frameworks. It is important that these issues are raised promptly to assist in any investigation, but also to comply with our regulatory obligations.

7. Know what's required of you



Make sure you understand what's required of you. Complete any required training and understand and follow any of the policies and procedures related to your role.

It's important that you read and understand all our policies, standards and procedures (some important ones are outlined below) and follow the laws and regulations that impact your role and our business. Make sure that if you have any questions, you raise them with your people leader.

We all have roles and accountabilities to manage risk and meet our compliance obligations. If you have specific risk and compliance activities required of you, you're expected to complete them in an honest and timely fashion.

If you have any questions about your risk and compliance responsibilities, raise them with your people leader or Risk and Compliance team.

Where to get support

If you'd like more information, are unsure about something covered in this document, or you're uncertain about how to comply with the Code of Conduct (for example when dealing with a particular customer or supplier), get in touch with your people leader, People & Culture or Risk & Compliance.

Other helpful documents

The Code of Conduct provides a broad set of standards about how we work together and how we conduct ourselves as representatives of Australian Unity. A comprehensive list of associated policies and procedures is set out below and are located on the [Policy Hub](#):

- Anti-bribery, Fraud & Corruption Policy
- We are Accountable Policy
- Welcoming Difference Policy
- Improving Performance Procedure
- Our Inclusive and Diverse Workplace Standard
- Our Respectful Workplace Standard
- Our Equal Opportunity Workplace Standard
- Speaking Up Policy
- Conflict of Interest Policy
- Consequence Management Framework
- Enterprise Risk Management Policy
- Compliance Management Policy
- SaferMe Policy
- Incident Management Policy
- Intellectual Property Framework
- Privacy Policy
- Privacy of HRIS Information Procedure
- Securities Trading Policy
- Social Media Policy
- Group Whistleblower Protection Policy
- Resolving Workplace Issues Procedure
- Sharing Media Policy