

POLICY REFERENCE	PC094.2
POLICY OWNER	General Manager, People & Culture
APPROVED BY	Evolve Housing Ltd Board of Directors
APPROVAL DATE	4 July 2022
REVIEW DATE	4 July 2025

CODE OF CONDUCT

1. THE CODE

Evolve Housing Limited and its controlled entities, excluding Evolve Housing Vic Limited (referred to as the Company) has adopted this Code of Conduct (the Code). The Code outlines the standard of behaviour expected of any individual who represents the Company in the course of carrying out their role and responsibilities.

2. IN AND OUT OF SCOPE

This Code applies to all Directors and Employees of the Company.

3. POLICY STATEMENT

The Company engenders a culture and environment of respect, dignity, inclusiveness, trust and integrity in serving the needs of our Directors, Employees, our Clients and Stakeholders. Our culture is foremost about caring and supporting each other and our clients and in turn the broader community. We expect Directors and Employees to:

- demonstrate behaviours which support and are consistent with the Company's Core Values;
- demonstrate personal and professional conduct as outlined in this Code;
- adhere to the Company policies and relevant law, standards and applicable third party requirements;
- demonstrate a duty of care to protect our employees and clients from foreseeable harm;
- act appropriately when a conflict arises between self-interest and duty to the Company;
- protect the Company's equipment and other resources, and use them only for the intended purpose;
- support and enhance the valuable reputation of the Company.

4. OUR VISION AND PURPOSE

We believe in everyone's right to a home – somewhere to feel safe and secure and to be part of a community.

- Our **Vision** is to achieve '*Thriving communities for all people*'.

- Our **Purpose** is 'to enable more people in need, to live in quality homes, in thriving and inclusive communities'.

5. CORE VALUES

In working toward achieving our Vision, it is essential that Directors and Employees adopt our Core Values, and demonstrate these both in the workplace and when dealing with colleagues, our Clients and our other stakeholders.

Our **Core Values** are:

- Inspiration** – we instil the motivation and courage to do it better
- Honesty and Integrity** – we act with sincerity, we do what is right not what is easy
- Empathy** – we understand what others are going through and are there to help
- Accountability** – it's what we do and do not do, for which we are accountable
- Respect** – we show people they are important to us by what we say and do

6. PERSONAL CONDUCT

In demonstrating our Core Values and complying with this Code, Directors and Employees should:

- treat everyone with courtesy, kindness, consideration, and sensitivity to their rights;
- treat everyone with dignity, respect, and with appreciation for their uniqueness and diversity;
- act honestly and in good faith;
- respect everyone's rights to privacy, and keep confidential information confidential;
- consider the impact of decisions and behaviour on the well-being of others;
- refrain from purposely acting in any way that would unfairly harm the reputation or career prospects of our colleagues or Clients;
- refrain from allowing personal relationships to affect professional relationships;
- undertake their duties and activities in a manner which protects and minimises impact to the environment and the community in which we operate;
- not attend work when performance of your duties is affected by alcohol, illegal drugs or other restricted substances;
- not consume at, or bring into the workplace, any illegal drugs or other restricted substances;
- not consume at, or bring into the workplace, any alcohol, unless approved in limited circumstances by a General Manager, for team related and/or social workplace activities;
- not give Clients, colleagues or visitors, in the workplace or elsewhere, alcohol, illegal drugs or other restricted substances, or encourage or condone their use.

7. PROFESSIONAL CONDUCT

Directors and Employees should behave professionally in all situations and with all stakeholders. Professional conduct is to be exhibited through the way we communicate, our personal appearance and the quality of interactions with our Clients, business and support partners, regulators and each other.

Directors and Employees are expected to:

- perform their duties diligently, impartially, conscientiously, with integrity, and to the best of their ability;
- ensure a duty of care by taking responsibility for the health, safety and wellbeing of themselves and others in the workplace;
- dress in a manner that meets safety requirements relative to their duties and that is respectful to other Employees and to Clients;
- attend work for the hours required in accordance with the terms of their employment and or engagement;
- undertake their duties and work in accordance with the equal opportunity rights of all individuals;
- refrain from any form of bullying, discrimination or harassment, including sexual harassment;
- abide by the professional and ethical standards relevant to their area of expertise;
- comply with any relevant legislative, regulatory and the Company policy requirements;
- communicate openly and collaboratively with their colleagues and managers ensuring a solution oriented and positive mindset;
- foster teamwork and collegiality among your colleagues, and always give due credit for the contribution of others;
- maintain adequate documentation to support any decisions made and only delete or destroy Company files or records (either paper or electronic) in accordance with Company policy;
- ensure services are provided in accordance with both the Residential Tenancies Act and Company policy, including but not limited to protocols outlined for our clients, tenants and property services
- not make improper use, or take advantage of, any confidential information of which they become aware;
- refrain from allowing personal political views and/or affiliations or other personal interests to influence the performance of their duties or exercise of responsibilities;
- refrain from developing non-work related relationships with Clients, including after hours.

8. OUR REPUTATION

The Company will often be judged by the way you represent it.

To protect and enhance our valuable reputation, in addition to demonstrating appropriate conduct Directors and Employees should also:

- refrain from engaging in any activity that may compromise the Company's reputation; and
- when and where appropriate, promote the interests of the Company.

No Director or Employee, other than the Chair of the Board and the CEO, is authorised to represent the Company, or make public comments about or on behalf of the Company, in any form, unless they are formally delegated to do so.

9. WORK, HEALTH, SAFETY AND WELL-BEING

The Company regards management of workplace health, safety and well-being as an integral and very important part of our business and our culture. All Directors and Employees are expected to:

- take reasonable care for their own health and safety, and ensure that their acts or omissions do not adversely affect the health and safety of others
- identify and report any incidents, near misses, or safety hazards which occur in the office, as well as while working remotely at home or in the field
- wear appropriate attire for the purpose of the task being performed
- correctly use all safety and protective clothing and equipment provided to you, including equipment such as the lone worker safety device
- follow any Company policy or procedure related to work, health and safety, as well as any reasonable instruction or rule given by the Company to protect the health and safety of all individuals in the workplace
- refrain from smoking within the office workplace, within ten metres of Company premises and within Company motor vehicles.

10. DIVERSITY AND INCLUSION

The Company is committed to fostering, cultivating and preserving a culture of diversity and inclusion. With respect to this, you:

- are expected to treat everyone inclusively and without prejudice;
- should embrace differences in age, race, religion, cultural ethnicity, language, gender identity, physical and mental ability, political affiliation, sexual orientation, socio-economic status, and any other characteristics that make us, and our Clients, unique.

11. DISCRIMINATION, BULLYING AND HARASSMENT

In light of our commitment to a culture of civility, respect, diversity and inclusion, the Company has a policy of zero tolerance for any form of hostility, offensiveness, intimidation, exclusion, harassment, bullying and any form of unlawful discrimination.

Directors and Employees are each responsible for their own conduct and must not engage in any behaviour that constitutes bullying, harassment or discrimination, or is in any other way unacceptable in the workplace.

12. CONFLICTS OF INTEREST

A conflict of interest occurs when the personal interests of a Director or Employee, conflict with their responsibility to act in the best interests of the Company. A conflict of interest can be financial or non-financial.

Directors and Employees must ensure that their actions and their personal interests do not conflict, or appear to conflict with their obligations to the Company. However, if a potential, actual or perceived conflict of interest arises, this must be disclosed prior to it occurring, or otherwise as soon as possible, by completing the relevant form.

13. GIFTS AND BENEFITS

The Company's reputation as being a professional and ethical workplace, can only be achieved and maintained if the community is confident that Directors and Employees are not influenced by gifts, benefits or bribes.

In this regard, if a Director or Employee receives (or gives) any gift or benefit, it must be properly disclosed and managed to ensure the situation is not considered to be (or become) a conflict of interest.

Some gifts or benefits of a nominal value may be accepted, provided full disclosure is made in accordance with Company policy.

14. USE OF COMPANY EQUIPMENT AND RESOURCES

Directors and Employees are provided with a range of Company owned equipment and resources to enable them to undertake their duties and responsibilities. Equipment and resources can include motor vehicles, mobile phones, computer equipment, stationery and access to the internet.

Directors and Employees must not abuse, waste or destroy Company equipment or resources. Equipment and resources should be treated with care at all times and secured against theft or potential damage.

15. USE OF ICT EQUIPMENT AND RESOURCES

IT equipment and services are critical components of our communication systems. Directors and Employees must comply with acceptable use requirements in accordance with the *Use of ICT Resources Policy* and any other policies pertaining to equipment or resources or their use. Improper use of any equipment or services, including but not limited to email and the internet, may pose a threat to system security, the privacy of Directors, Employees and Clients, and may adversely affect the Company's legal liability or reputation.

Directors and Employees must not:

- create or exchange messages that are offensive, harassing, obscene or threatening, or visit websites containing objectionable or criminal material;
- distribute or exchange any confidential or sensitive information held by the Company (unless in the authorised course of their duties);
- violate copyright laws pertaining to work or non-work related resources (including uploading or downloading of commercial software, games, music or movies);
- participate in internet-enabled activities such as gambling, (excluding organisation arranged football tipping competitions), gaming, conducting a personal business or conducting illegal activities;
- create or distribute advertisements, solicitations, chain letters or other unsolicited or bulk email;
- create or distribute any content which may be unfavourable towards Evolve Housing or any of the Company's business or support partners;
- share passwords for Company systems or store or display passwords where they could be accessible by others;
- use equipment or resources for unacceptable purposes including unethical, discriminatory, or unlawful purposes.

Directors and Employees must not use the Company's ICT resources for personal benefit or gain. Personal use of computer, internet and email facilities should be limited. Directors and Employees must ensure their personal use does not:

- hinder their own or others' work performance; or
- impact the Company's business, including decreasing network performance, causing additional expenses or compromising the security of the Company's systems, data and / or information.

16. USE OF MOTOR VEHICLES

When driving a Company vehicle, or a private vehicle for Company purposes, Directors and Employees are required to exercise their responsibilities outlined within the Company's *Motor Vehicle Policy*, to ensure our safety and wellbeing and that of our colleagues and the general public. Some of the main responsibilities include:

- obtaining approval before using a Company motor vehicle;
- carrying a current driver's license when driving either a Company vehicle or private vehicle for work purposes;
- driving safely and responsibly and complying with road and traffic regulations and by-laws at all times;
- not driving whilst under the influence of drugs or of alcohol;
- maintaining the good condition of Company motor vehicles including not eating or smoking in the vehicle; and
- ensuring the vehicle is parked in a safe place when unattended.

17. DELEGATIONS OF AUTHORITY

In performing your role within the Company, certain actions or activities will require approval by one or more authorised individuals before they can take place. Which Director or Employee is authorised to provide what approval, is set out in the Company's Delegations of Authority Policies.

Delegations are a key element in the effective governance and management of the Company. In carrying out duties and responsibilities, Directors and Employees must ensure they obtain any required approval from an appropriately authorised individual.

18. PRIVACY, CONFIDENTIALITY AND INTELLECTUAL PROPERTY

As a Director or Employee, it is your responsibility and obligation while at the Company, and after you leave, to ensure that the Company's intellectual property, or information that is confidential or commercially sensitive, remains confidential and secure in order to protect the Company's interests and to ensure we comply with regulatory and legal requirements. Importantly, under the Privacy Act 1988 (Cth), this includes the personal or private information that relates to us as Directors and Employees, and to our Clients.

Confidential information is any Company information which has not been released to the general public (for example, via the Company's website or media releases). Intellectual property is considered to be all work developed or created by a Director or Employee (or with their assistance), in the context of our business or related activities, and therefore it remains the property of the Company.

19. ADDITIONAL WORK OR EMPLOYMENT

Whilst employed by the Company, you must not undertake any additional or extra work (whether it be paid, voluntary, or your own business) where it could interfere, or cause a conflict of interest with your Company duties. If you are in this situation, you must notify the General Manager, People & Culture who will consult with, and (if appropriate) seek approval from, the Chief Executive Officer.

Approval will be assessed on a case-by-case basis, however if the proposed outside work or employment conflicts with your role within the Company, or disadvantages the Company in any way, approval will not be given.

20. LEAVING THE COMPANY

On leaving the Company, Directors and Employees are required to return all Company documentation, whether confidential or not, and whether in hard or soft copy. All Company equipment and other resources must also be returned, unless specifically allowed under your contract of employment, or by legislation.

After leaving the Company, Directors and Employees have a continuing obligation to maintain the confidentiality of Company documentation, and not use it for personal or financial gain. This

obligation includes information you have had access to, and all work performed by you, while with the Company.

21. COMPLIANCE WITH THE CODE OF CONDUCT

All Directors and Employees have an obligation to comply with this Code and the Policies that underpin the Code. A breach of the Code may lead to disciplinary action, including where appropriate, termination of employment.

If you are in any doubt about the Code or its application, you should immediately seek advice from your manager or People & Culture, or in the case of a Director, the Chair of the Governance, Nomination & People Committee.

22. REPORTING MISCONDUCT AND WHISTLEBLOWER PROTECTION

Employees are required to report any known or apparent breach of this Code, any misconduct, or any wrongdoing, to their General Manager, to the General Manager, People & Culture, or to the CEO, or in the case of the CEO or a Director, to the Chair of the Board.

All reports will be acted on and kept confidential. No person who makes a report will be disadvantaged or prejudiced if they report in good faith, a suspected breach of a law, regulation or the Code.

Under Australian law, special protection against reprisal is provided to anyone disclosing certain breaches, as long as specific conditions are met. These conditions are set out in the Company's *Whistleblower Protection Policy*.

23. DEFINITIONS

Client	A person (including applicants) who the Company deals with in relation to housing or support services.
Company / our / us / we	Evolve Housing Limited and its controlled entities, excluding Evolve Housing Vic Limited
Director / you / your	A person appointed and currently serving, as a member of the Board of Evolve Housing Limited or its controlled entities, excluding Evolve Housing Vic Limited.
Employee / you / your	<ul style="list-style-type: none"> Any person employed on a full time, part time or temporary basis by the Company. Any person engaged to represent the Company under a fixed term contract. Any person (including Clients of the Company) who volunteers for the Company from time to time. Students, including cadets, interns, and school students undertaking work experience. For the purpose of this policy, Contractors engaged in providing services to and or behalf of the Company are included within the description "Employee".

24. RELEVANT COMPANY POLICIES include:

- Abandonment of Tenancy Policy
- Conflicts of Interest Policy
- Company Delegations of Authority Policy
- Credit Card Policy
- Discrimination, Harassment and Bullying Prevention Policy
- Employee Social Media Policy
- Equal Opportunity and Anti-Discrimination Policy
- External Communications Policy
- Field Safety Guidelines
- Fraud, Bribery and Corruption Prevention Policy
- Gifts and Benefits Policy
- ICT Password Management Policy
- Mobile Devices Policy
- Motor Vehicle Policy,
- Use of ICT Resources Policy
- Smoke Free Workplace Policy
- Whistleblower Protection Policy
- Work from Home Policy
- Work Health and Safety Policy
- Workplace Surveillance Policy

25. ACCEPTANCE

I confirm that I have read, understood and accept the terms and conditions of this document. I understand that failure to comply with the Code could give rise to disciplinary action.

Name (print)

Position (Director / Employee / Contractor / Volunteer / Student)

Signature

Date

26. VERSION CONTROL

VERSION	Date Approved	Author	Key Changes
1.0	1/11/2016		Policy adopted
2.0	4/07/2022	Raylee Golding, GM GAL/ Co Sec	Application of policy extended to controlled entities (excluding Evolve Housing Vic Limited)