



Code of Conduct

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1 Definitions

“Associate” includes your spouse, partner, parent, child, parent-in-law, child-in-law or other relative, or entity in which you or an Associate has a material interest, whether direct or indirect, and whether legal or beneficial, or an entity in which you are a director or officer.

“BBI” refers to Blackwood Biosecurity Inc.

“Code” means this Code of Conduct.

“Confidential Information” means information relating to the business or internal affairs of BBI obtained by you in the course of your employment, and includes but is not limited to any of the following types of information:

- information which BBI indicates is confidential;
- information which by its very nature might reasonably be presumed to be confidential or to have been disclosed to you in confidence;
- information which would be of commercial value to a competitor, customer or supplier of BBI;
- information about BBI’s financial affairs;

and includes but is not limited to any of the following documents and records:

- documents which are prepared for internal use;
- commercially sensitive documents;
- personnel records and other information regarding internal procedures, processes and systems;
- information obtained verbally whether in formal meetings, during discussions or in any other way;

except for information that is freely available in the public domain (other than where it has become public because of a breach, by you or someone else, of an obligation of confidence).

“Conflict of Interest” exists where loyalties are divided. You would have a potential conflict of interest if, in the course of your employment, any decision you make could provide any gain or benefit to yourself or an Associate. A *“conflict of interest”* is a situation that would give rise to a reasonable belief that the impartiality of the person having the interest would be adversely affected.

“Customer” refers to any individual or organisation who receives a service from BBI.

“Discrimination” occurs where a person is given less favourable treatment than someone else. There are a number of grounds under which it is unlawful to discriminate against a person.

Direct discrimination occurs when a person is treated less favourably than another person in the same or similar circumstances. For example, unlawful sex discrimination may arise if a person is refused a job interview because she is a woman.

Indirect discrimination occurs when there is a requirement that adversely impacts on a particular person with an attribute covered by anti-discrimination legislation (eg. sex, race, disability, age, marital status, etc). There may be no intention to discriminate, but the conduct or decision leads to a discriminatory effect if the conditions imposed are not reasonable. For example, it may be indirect discrimination if the only way to enter a public building is by a set of stairs as people with disabilities who use wheelchairs are unable to enter the building.

“EEO” refers to Equal Employment Opportunity.

“Employee” includes Management Committee members, paid staff, contractors, work experience students, volunteers and any other persons engaging in work, whether paid or unpaid, for BBI.

“Employment” pertains to individuals, landholders, public or private organisations, government departments, and any other parties who perform work, whether paid or unpaid, for BBI.

“Harassment” includes any unwelcome behaviour that offends, humiliates or intimidates a person. Generally, unlawful harassment occurs when someone is subjected to prohibited behaviour under anti-discrimination legislation. Harassment can involve physical conduct, verbal conduct or visual conduct (eg. in the form of posters, email, or SMS messages).

“Landholder” refers to an individual or organisation who owns, manages, leases, or is otherwise responsible for land.

“Manager”:

- for employees, *“manager”* refers to the manager designated in your contract of employment;
- for Management Committee members, *“manager”* refers to the Management Committee Chairman;
- for contractors, *“manager”* refers to the person or role designated in your contract;
- for volunteers or work experience students, *“manager”* refers to your volunteer or work experience manager;
- for any other *“employee”*, *“manager”* refers to the person designated in the relevant paperwork organising that *“employment”*.

“Management Committee” refers to the group of people, called Management Committee Members, who are responsible for the management of the affairs of the BBI as per the Model Rules of Association. In this document, Management Committee Members are considered BBI employees.

“Stakeholders” include individuals, landholders, public or private organisations, government departments, and any other parties who have an interest in the BBI.

2 Introduction

A Code of Conduct sets out the core values we apply to our everyday experiences. When we demonstrate these values, we build an organisation with integrity that has the trust and confidence of our stakeholders and the public.

This Code of Conduct applies to all employees of Blackwood Biosecurity Inc (BBI) and is designed to provide guidance about what is expected from us in our work and in our dealings with colleagues, stakeholders and the public. It provides guidance about ethical conduct and promotes good practice, giving us a summary of our obligations and appropriate standards of behaviour, and empowering us to handle ethical dilemmas we may encounter in our employment.

The purpose of this Code of Conduct is to provide an ethical framework for decisions and actions. As it is not possible for this Code to address all ethical questions or behaviour that we may encounter, we also need to be aware of, and comply with, relevant legislation and BBI policies. Our manager(s) will assist us in maintaining an awareness of standards of conduct and in resolving ethical dilemmas. However, this does not remove our responsibility for being accountable for our own actions and decisions.

This Code of Conduct provides a framework of principles for conducting business and dealing with colleagues, the public, stakeholders and other organisations, following our Values:

Courage

We understand that doing what is right is not always what is easy. And that to achieve something new, we must be willing to do what we have never done before.

Respect

We treat everyone with dignity and fairness. We recognise contribution and value diversity.

Empathy

We extend ourselves to understand other people's perspectives. We communicate and act in a respectful way that makes sense to others.

Accountability

We are individually accountable and collectively responsible. Our actions are transparent and open to scrutiny and we will uphold our values with honesty and integrity.

As employees, we have, and should be seen to have, the highest standards of ethical behaviour – anything less undermines our integrity, our effectiveness, and ultimately our reputation.

We will:

- act with integrity and professionalism and be scrupulous in proper use of BBI information, funds, equipment and facilities;
- exercise fairness, equity, proper courtesy, consideration and sensitivity in dealing with customers, employees and other stakeholders; and
- avoid real or apparent conflict of interests.

All BBI Management Committee members, employees, contractors, volunteers, and any other individual or entity performing paid or unpaid work for BBI must be familiar with and abide by this Code of Conduct. This document forms part of your obligations to BBI, and you are required

to comply with its contents. Failure to do so may result in disciplinary action, which could include dismissal.

For this reason, it is important that you read the whole of this document and ask your manager for clarification if there is anything in it that you don't understand. Once you have signed and returned the acceptance section on the last page, it will be assumed that you understand the contents of this Code of Conduct and agree to comply with it.

If you have management responsibilities, you must ensure that employees reporting to you have access to this Code of Conduct and are given opportunities for training where appropriate.

3 Responsibilities

Employees are required to:

- 3.1 promote the interests of BBI;
- 3.2 perform our duties with skill, honesty, care and diligence, using authority in a fair and equitable manner;
- 3.3 abide by BBI policies and procedures, instructions and lawful directions that relate to our employment and duties; and
- 3.4 comply with this Code of Conduct.

4 Working Environment

- 4.1 BBI will provide a safe, healthy and productive working environment and we have a duty of care to take all reasonable steps to ensure our own safety and well-being in the workplace, as well as that of co-workers, our stakeholders and the public.
- 4.2 BBI has a policy of zero tolerance to the consumption and possession of alcohol at work, except in cases of approved employee and customer entertainment. The abuse of prescription drugs or the use or possession of illicit drugs, either at work, or in a manner that detrimentally affects performance at work, will not be tolerated, and neither will the consumption of anything else which detrimentally affects other employees, work performance, safety or where it violates the law.
- 4.3 BBI employees must not carry weapons or ammunition while working for BBI, unless approved in writing by their manager. Possession of a weapon during work hours without permission is ground for summary dismissal.
- 4.4 Any conduct which is intimidating or offensive to other employees, contractors, volunteers, the public or any other person will not be tolerated.

5 Standards of behaviour

5.1 Employee Responsibilities

5.1.1 Understand the role we are employed for:

- Gain a clear understanding of the role or purpose of our position;
- Develop an understanding of the environment in which we operate; and
- Stay informed about all relevant activities affecting our role and duties.

- 5.1.2 Work together as a committed team to deliver excellence to our stakeholders;
- 5.1.3 Respect, support, encourage and value each other;
- 5.1.4 Continuously improve our processes;
- 5.1.5 Take ownership and be proactive;
- 5.1.6 Act with integrity and honesty;
- 5.1.7 Have open and honest two-way communications; and
- 5.1.8 Strive to keep ourselves and others safe.

5.2 Workplace behaviour and personal conduct

Treat colleagues, stakeholders and members of the public with dignity and respect:

- 5.2.1 Ensure our behaviour and performance meets workplace standards at any time that we are representing BBI or are likely to be identified or associated with our role as a BBI employee (whether or not we are 'on duty' at the time); and
- 5.2.2 Make sure we are familiar with and follow BBI's policies on equal opportunities and the prevention of discrimination and harassment.

5.3 Compliance with Lawful Instructions

- 5.3.1 We are expected to follow all reasonable and lawful instructions related to our work given by our manager.
- 5.3.2 We should accept that we may not personally agree with all decisions made by our manager.
- 5.3.3 If you think that an instruction is unreasonable, you should tell the person giving that instruction that the instruction is, in your view, unreasonable, and allow them the opportunity to respond. In the interim, you are generally required to carry out the instruction unless:
 - there is a danger to a person's health and safety; or
 - a conflict of interest may exist; or
 - it does not comply with BBI policies and procedures.
- 5.3.4 You may refuse to comply with an instruction that appears to be unlawful and report the matter to the next level of management.
- 5.3.5 Managers must be able to justify your instructions and decisions in line with your delegations, authority, and BBI policies and procedures, and be open and respond promptly to constructive questions.
- 5.3.6 If you object to an instruction on genuine conscientious grounds, or if there may be a perceived conflict with a professional code of ethics, you should attempt to negotiate and resolve the matter with your manager to achieve a mutually acceptable solution. If a local resolution is unable to be reached, refer the issue to the next level of management.

5.4 Relationships Between Management Committee Members and Other Employees

5.4.1 Management Committee Members will work as part of the Management Committee team and will:

- accept that your role is a leadership, not a management or administrative one;
- communicate through the Executive Officer regarding the work of the staff;
- acknowledge that you have no capacity to individually direct members of staff to carry out particular functions; and
- refrain from publicly criticising staff in a way that casts aspersions on their professional competence and credibility.

5.5 Private Activities

BBI has a legitimate interest in your private activities because some of these activities may bring discredit upon BBI and may possibly call your fitness for continued employment into question.

5.5.1 In determining whether an employee's private activity or conduct is outside the provision of this Code of Conduct, due regard will be taken of the following factors:

- The nature and circumstances of the activity;
- The position, duties, and responsibilities of the employee;
- The consequences of the activity on the ability of the employee to fulfil their duties and responsibilities; and
- The effects of the activity or its consequences on relationships of BBI with our stakeholders.

5.5.2 Examples of unacceptable behaviour/activities include behaviour which:

- negatively affects your own or another's performance or has the potential to do so;
- is fraudulent;
- embarrasses or threatens the reputation of BBI;
- could result in you being charged and/or convicted of a criminal offence which, in the opinion of BBI, brings into question your suitability to remain as an employee; or
- otherwise breaches the obligations created under this Code of Conduct.

5.5.3 Employees have an obligation to disclose any activity, conduct or the existence of any allegation, charge or offence that could possibly call your fitness for continued employment into question.

5.5.4 Failure to disclose behaviour/activities which are considered unacceptable, may result in disciplinary action and could lead to dismissal.

5.6 Managerial roles and responsibilities

5.6.1 As a manager, you have a responsibility to set a good example for employees through your own behaviour and attitudes, especially in relation to upholding the ethical principles, obligations and standards in this Code of Conduct. You should ensure that you understand your responsibilities under relevant legislation,

policies and procedures, maintaining the principles of accountability, continuous improvement, fairness, flexibility and equity in the workplace.

- 5.6.2 You should ensure that employees understand the performance standards expected from them and objectively assess their performance against these standards.
- 5.6.3 You must ensure that relevant legislation, delegations, and BBI policies and procedures are accessible to all employees in your workgroup.
- 5.6.4 You are required to act promptly, thoroughly and fairly when responding to, or investigating grievances and reports of breaches of this Code of Conduct.
- 5.6.5 To avoid any accusation of bias, you must not be involved in the appointment of any applicant if you are an associate of or friend to them. Similarly, you must not be involved in decisions relating to discipline, promotion or pay adjustments for any employee who is an associate or friend. If you are in any doubt, you should discuss the matter with your manager.
- 5.6.6 You should ensure your leadership and management style:
- is based on open, honest and thorough communication;
 - provides for optimum working conditions within the resources available to you;
 - supports positive performance management processes, including access to related learning and development opportunities for employees; and
 - supports the right of employees to engage in open dialogue with you, and to pursue relevant conflict and grievance management options when issues arise.

5.7 Working safely

- 5.7.1 Any activity that presents a significant risk to the health, safety or well-being of an employee or other person must have been subject to a written risk assessment. This is a tool which managers must use to determine the safest and best way of carrying out the work, including appropriate training and personal protective equipment.
- 5.7.2 Employees must follow the resulting safe system of work to ensure that our safety and that of others is not put at risk.
- 5.7.3 Employees must:
- comply with BBI instructions given for workplace health and safety at the workplace;
 - use personal protective equipment if the equipment is provided and we have been properly instructed on how to use it;
 - not wilfully or recklessly interfere with or misuse anything provided for workplace health and safety at the workplace;
 - not wilfully place at risk the health and safety of any person at the workplace;
 - not wilfully injure oneself;
 - record all hazards in a Hazard Register;

- report to our manager any workplace hazards that cannot be immediately rectified;
- ensure that we comply in practice with any guidelines given for performing manual handling tasks; and
- take all reasonable steps to ensure that employees we supervise are following guidelines and have access to job-specific training.

5.8 Attendance and Punctuality

- 5.8.1 We are expected to attend work on our ordinary days of work, and as otherwise agreed with our manager.
- 5.8.2 We are expected to be punctual and work for the full hours expected of us.
- 5.8.3 If we are unable to attend work for any reason, we must advise our manager as soon as possible to enable them to make alternative arrangements for our work to be covered, and must provide supporting evidence where requested.
- 5.8.4 Planned absences must have manager approval in accordance with our Leave Policy.

5.9 Learning and Development

We are obliged to participate in learning and development opportunities made available to us to develop the skills and knowledge necessary to perform our job. We should seek feedback on our work performance and reasonably engage in any plans for improving our work performance.

5.10 Grievances

If we have a concern or grievance in relation to certain aspects of our employment, we can use the Grievance Procedure. This provides an opportunity for us to formally lodge a grievance that has not been resolved through informal means. Any employee who submits a grievance in good faith will not suffer any adverse consequences as a result of submitting the grievance.

5.11 Criminal Charges and Convictions

- 5.11.1 BBI requires all applicants for jobs to disclose all contraventions of, or failures to comply with, any provisions of law, whether committed in Australia or elsewhere. Once you are an employee, you must notify BBI in writing if you are charged with any offence or if you are convicted of any offence.
- 5.11.2 If you are charged with an offence, the notice must be given immediately after you are charged (ie. next working day).
- 5.11.3 If you are convicted of any offence, the notification must be given immediately after you are convicted (ie. next working day). It should be noted that the term “conviction” includes a finding of guilt, regardless of whether or not a conviction is recorded.
- 5.11.4 Failure to notify BBI in either case will constitute grounds for disciplinary action.

6 Accountability

- 6.1 We have a responsibility to ensure efficient and effective operations, to avoid extravagant and wasteful use of resources, and to record processes carried out when purchasing goods and services.
- 6.2 Through accountability for expenditure, we will:
 - 6.2.1 act in a lawful, ethical and justifiable manner;
 - 6.2.2 demonstrate personal integrity and reliability;
 - 6.2.3 maintain confidentiality; and
 - 6.2.4 ensure compliance with all statutory and legal requirements.
- 6.3 We will engage in fair and open procurement activities, with the emphasis on buying local where possible.

7 Confidential Information

- 7.1 We will:
 - 7.1.1 ensure all BBI information is kept strictly confidential;
 - 7.1.2 not misuse information obtained in the course of our duties for direct or indirect gain, or to do harm to other people; and
 - 7.1.3 respect the privacy of individuals.
- 7.2 Security of information
 - 7.2.1 We have individual responsibility for any documents or other records in our custody. Records should not be left in places where they may be seen by non-employees such as at home, an office or in a motor vehicle.
 - 7.2.2 We will:
 - ensure confidential information under our control, in both paper and electronic form, is kept in a secure place;
 - lock away confidential documents rather than leave them lying on desks; and
 - avoid discussing confidential BBI business in public places where there is a likelihood of being overheard.
 - 7.2.3 We will not, except as reasonably necessary in order to perform our accountabilities,:
 - seek to obtain confidential information to which we have not been granted access;
 - remove any confidential information from BBI premises; or
 - make any copies of confidential information;unless we have been granted written permission from our manager.

- 7.3 Unauthorised disclosure of BBI information, including the misuse of intellectual property belonging to BBI is prohibited.
- 7.3.1 Such disclosure or misuse will be dealt with in accordance with the Conduct Improvement and Discipline Process, and BBI may seek legal redress.
- 7.3.2 This applies both during employment with BBI and for a reasonable time after your employment ceases. It is acceptable that use of background knowledge and experience gained during employment is not restricted.

8 Media Communications

8.1 Social Media

Our conduct in social media may negatively impact on BBI. To avoid this:

- 8.1.1 it is important to remember that social media is often unmoderated, and so the potential for offensive remarks and opinions is therefore greater than many other forms of public expression;
- 8.1.2 if we could be identified as a BBI employee and posted offensive, racist or obscene material, even in our own time and using our own resources, we could be in breach of the standards of behaviour detailed in this Code of Conduct;
- 8.1.3 unless we have explicit permission to represent BBI in social media forums, we may not lead others to believe that we are commenting on behalf of, or in the name of, BBI;
- 8.1.4 where we comment or share information on a subject that could be construed to be related to BBI, we must disclose our relationship with BBI and provide a clear disclaimer that views expressed are our own, and in no way represent those of BBI; and
- 8.1.5 distribution of any BBI information on social media, including photos and videos, is strictly prohibited.

8.2 Communications with media, the public and other stakeholders

- 8.2.1 To protect and enhance BBI's reputation, and to protect its commercial interests, it is important to ensure that only authorised material is communicated to the public, the media and other stakeholders.
- 8.2.2 To ensure that consistent and accurate messages are publicly communicated, only the Executive Officer and the Management Committee Chairman, or their delegated representatives are authorised to speak on BBI's behalf.

9 Financial Management

9.1 Credit/Debit Card

Credit/debit cards may only be used for business expenses and not for expenses of a personal nature.

9.2 Travel Expenses

9.2.1 We may only claim or accept travel and sustenance expenses arising out of travel-related matters which have a direct bearing on the services, policies or business of the BBI.

9.2.2 No alcohol can be claimed as a travel expense.

9.3 Expense Claims

We will be reimbursed business expenses as follows:

9.3.1 Copies of all tax invoices / receipts must be produced, and a reimbursement form completed in order to claim reimbursement for expenses.

9.3.2 Reimbursements will be included in your fortnightly pay.

9.4 Workshop, Meeting and Working Meal Expenditure

9.4.1 While providing hospitality for workshops and meetings are legitimate business activities, we must exercise good judgement and must not provide hospitality that is not required, or is inappropriately lavish. To determine whether hospitality expenditure is ethical, we should ask:

- How is the expenditure benefiting BBI?
- Can this expenditure be defended publicly?
- Has it been approved in the appropriate manner and in line with the appropriate delegations?

If the answers to any of the above are "no" or are unclear, the expenditure should not proceed.

10 BBI Property

10.1 All equipment provided to us remains the property of BBI and will only be used for official purposes.

10.2 Unless governed by law or otherwise agreed in writing, any intellectual property developed by us during, or as a result of, our employment by BBI is the sole property of BBI.

10.3 We will ensure that:

10.3.1 equipment is operated in accordance with the manufacturer's specifications, is maintained in good condition and stored securely;

10.3.2 chemicals are used in accordance with the manufacturer's safety data sheets, and are handled and stored securely;

10.3.3 BBI property is not removed from the premises without authorisation except where the items are necessary for the performance of our duties. If, for business reasons, removal of other items is necessary, then appropriate approval will be obtained from our manager.

10.3.4 Any damage or loss of property or equipment is reported immediately to our manager; and

10.3.5 Equipment is used effectively and economically.

10.4 Use of Telephones, Computers and Internet

- 10.4.1 All BBI telephone accounts are monitored. Personal calls should be kept to a minimum.
- 10.4.2 Computers are provided for BBI use only and these may be removed from the premises only if they are being used for business activities.
- Software should only be used in accordance with relevant licence agreements and copyright must be strictly adhered to.
 - BBI security measures covering system access and virus protection must be adhered to at all times.
- 10.4.3 Copyright law is to be observed at all times in copying or distributing any material.
- 10.4.4 Email and internet systems are BBI resources intended for business purposes only:
- Employees may not knowingly transmit, receive, download or visit sites containing material that could be perceived by others as offensive, sexually explicit, annoying, insulting, harassing or intimidating.
 - Distribution of such messages via these and other systems is prohibited, as inappropriate use could result in BBI attracting criticism or even legal action.
 - BBI reserves the right to access employee email accounts.

11 Fraud and Corruption

- 11.1 We must not engage in any fraud, corruption, unethical or improper practices, or irregular transactions. To assist in understanding these concepts:
- 11.1.1 Fraud, generally, is the intentional use of false representations or deception to avoid an obligation or obtain an unjust advantage.
- 11.1.2 Corruption, generally, is behaviour that may involve fraud, theft, misuse of position or authority, or other acts that are unacceptable to BBI and which would be likely to cause loss to BBI, its stakeholders or the community.
- 11.2 As part of its obligations under the law, BBI will fully co-operate with any investigation by law enforcement or regulatory authorities. It will also require that we:
- 11.2.1 do not make any disbursement of BBI funds or property without adequate supporting documentation;
- 11.2.2 do not make any personal payments through BBI accounts; and
- 11.2.3 do not take any action or authorise any action, which involves illegal, unethical or immoral acts.

12 Conflict of Interest

- 12.1 The expressions “*Conflict of Interest*” and “*Associates*” are defined in Section 1 of this Code of Conduct. Generally, a conflict of interest will exist where the person’s loyalties are or may be divided or are perceived to be so. Any situation potentially involving direct or indirect conflict of interest between us and BBI should be avoided unless specifically consented to in writing by our manager.
- 12.2 We must avoid any personal, financial or other interest which may be in conflict with our duties and responsibilities to BBI.
- 12.3 Any interest or situation which may constitute an actual, potential or perceived conflict of interest must be promptly disclosed to our manager.
- 12.4 If we believe we know of a potential or actual conflict of interest, we have a duty to raise that matter with our manager.
- 12.5 Secondary Employment/Volunteering
- 12.5.1 To further minimise the risk of conflicts of interest and, for the other reasons below, secondary employment, or volunteering with another organisation while employed at BBI is not permitted unless prior written approval from our manager has been obtained. Applications to continue in or undertake secondary employment will be considered with regard to whether:
- the secondary employment is likely to be detrimental to the efficient performance of BBI duties;
 - the secondary employment could lead to a conflict of interest or a clash of loyalties; and,
 - in the course of official duties, we would have access to confidential and privileged information not generally available to the public, which may be relevant to the secondary employment.
- 12.5.2 The operation of private businesses, or possession of an Australian Business Number, is included in the category of outside employment.
- 12.5.3 If we are approved to engage in secondary employment:
- our contractual obligations to BBI must be fulfilled prior to engaging in our secondary employment;
 - our official capacity as a BBI employee is not used in connection with the secondary employment;
 - our secondary employment must be performed wholly in our private time;
 - the nature of the secondary work would not bring BBI into disrepute; and
 - it is our responsibility to advise our manager of any changes in circumstances that may affect this approval.

12.6 Outside Business Activities

12.6.1 Extreme care should be taken to ensure that active participation in any outside business does not create a potential conflict of interest.

12.6.2 If we propose to engage in outside business activities, we should assess those activities in terms of the following guidelines to determine whether a conflict exists with BBI business commitments:

- where our participation in outside business activities interferes with our ability to satisfactorily perform assigned work for BBI, a conflict of interest will exist;
- where we have knowledge of confidential information, and actively participate in outside business activities for a competitor of BBI, a potential conflict of interest will exist; and
- if we have knowledge of confidential information, we shall not engage in any outside business activity without first obtaining written approval from our manager.

12.7 Gifts and Entertainment

12.7.1 A gift or favour should not be accepted or given if it might create a sense of obligation, compromise our professional judgment or create the appearance of doing so.

12.7.2 In deciding whether a gift is appropriate, we should consider its value and whether public disclosure of the gift would embarrass us or BBI. Any gift or favour that in summation of its parts would be valued at \$25 or greater is considered material and must be declared and reviewed.

12.7.3 We may not encourage or solicit meals or entertainment from anyone with whom BBI does business, or who desires to do business with BBI. Giving or accepting valuable gifts or entertainment might be construed as an improper attempt to influence the relationship.

13 EEO, Discrimination and Harassment

13.1 At BBI, we treat each other with respect and dignity. This means that all employees are entitled to work in an environment that is free of harassment, bullying and discrimination.

13.1.1 Harassment, bullying and discrimination can take many forms, including:

- unwelcome remarks, gestures or physical contact;
- the display or circulation of offensive, derogatory or sexually explicit pictures or other materials, including by email and on the internet;
- offensive or derogatory jokes or comments (explicit or by innuendo); or
- verbal or physical abuse or threats.

13.2 BBI is committed to providing equal employment opportunity in recruitment practices, and expects us to make recruiting decisions based solely on job-related criteria.

- 13.3 Discrimination or harassment based on race, colour, gender, sexual orientation, age, physical or mental disability, marital status, family or carer's responsibilities, pregnancy, religion, political opinion, national extraction, social origin, or other personal factors will not be tolerated.
- 13.4 We are entitled to our personal preferences in these matters. No pressure should be placed on anyone to influence those preferences and no approval or disapproval should be shown of anybody's preferences or activities.

14 Customer Service

- 14.1 We will deliver exceptional value and service to stakeholders by conducting ourselves with integrity and in a manner that ensures:
- 14.1.1 all decisions and actions are evaluated in terms of our impact on stakeholders;
- 14.1.2 there is a safe and friendly environment at all times for both employees and stakeholders.

15 Community Activities

As a responsible and caring organisation, BBI encourages us to participate in professional associations, trade associations, charitable or service organisations and other community activities. BBI also recognises that we may from time to time wish to participate in political activity and/or service in public office.

- 15.1 Such activities will not generally create difficulties, but the following points should be considered:
- 15.1.1 We shall ensure that where any non-business activity is likely to involve a substantial commitment of time, it does not impact on our ability to satisfactorily perform our assigned work for BBI;
- 15.1.2 If outside activity adversely affects our work performance, we may be requested to modify the activity;
- 15.1.3 Where the outside activity involves service as a member of local government or other political activity, there shall be no specific or implied BBI endorsement of such activity.
- 15.1.4 Where we wish to speak at a public function, or write an article in our own right, but not as a representative of BBI, such activity is permissible provided that:
- BBI information is not divulged (other than information that is a matter of public record or officially published by BBI);
 - names or logo do not appear (unless permission has been obtained from our manager); and
 - we clearly indicate that we are not speaking or writing as representatives of BBI.

- 15.2 If we are representing BBI in an external organisation, we must:
 - 15.2.1 have written permission from our manager to do so;
 - 15.2.2 clearly understand the basis of that representation;
 - 15.2.3 present BBI-approved messaging;
 - 15.2.4 be badged as a BBI representative (wearing BBI work clothing and/or a BBI name badge); and
 - 15.2.5 provide regular reports to BBI on the activities of that organisation.

16 Leaving the Organisation

On leaving BBI, we must surrender all BBI property and items containing business information. This includes intellectual property that may have been created while working for BBI.

17 Contractors

This Code of Conduct applies to contractors and the employees of contractors working in a BBI workplace, as if reference in this Code to an employee were instead a reference to the contractor or employee of the contractor.

18 Breaches of the Code of Conduct

- 18.1 We hold a position of trust, and we are therefore accountable for our actions.
- 18.2 We have a duty to observe the Code of Conduct and ensure that no breaches occur. Breaches require immediate attention and we have a duty to report known or suspected breaches of the Code.
- 18.3 If we, in good faith, make a complaint or disclosure about an alleged breach of the Code of Conduct, and follow the reporting procedure outlined below, we will not be disadvantaged or prejudiced in the making of such a complaint or disclosure. All reports will be treated as confidential.
 - 18.3.1 Any complaint or disclosure about an alleged breach of the Code of Conduct should be in writing. It should contain details about the date, time and nature of the alleged breach and include any available supporting material.
 - 18.3.2 The allegation should be made to our manager.
 - 18.3.3 Our manager should undertake a prompt and thorough investigation and determine whether any action is required.
 - 18.3.4 If action is required, the matter will be dealt with as detailed in BBI's Conduct Improvement and Discipline Process.
 - 18.3.5 The employee to whom the allegation refers will be informed of the outcome of the investigation.
- 18.4 We may at any time discuss a matter, or seek advice on how to proceed with a matter, from our manager.

19 Related Documents

We will abide by the following documents:

- 19.1 Bullying, Harassment and Discrimination Policy
- 19.2 Health and Safety Policy
- 19.3 Leave Policy
- 19.4 Grievance Procedure
- 19.5 Conduct Improvement and Discipline Process

20 Employee Certification

I (name) certify that I have received a copy of this Code of Conduct.

I have read and understood this Code of Conduct, and agree to uphold and abide by the obligations stated in this document.

.....

Signature

...../...../.....

Date