

Codes of Conduct, Ethics and Equal Opportunity

All workplace participants of Housing Plus are expected to observe the highest standards of ethical behaviour and integrity in their conduct. Housing Plus' Code of Conduct and the Code of Ethics and Equal Opportunity sets out our key values and how they should be applied within our workplace and in our dealings with external stakeholders.

Housing Plus' Codes of Conduct, Ethics, and Equal Opportunity applies to all workplace participants of Housing Plus. Board Directors have documented the Board Members Code of Conduct in their Strategic Policies GP2j and have further committed to comply with the ASX Corporate Governance Principles.

This Code of Conduct has been prepared having regard to the Australian Standard 8002-2003 'Organisational Code of Conduct'. It is an important management tool, which can positively shape our culture.

Introduction from CEO

Housing Plus will only succeed in achieving our corporate objectives where we have the respect of our stakeholders and the communities in which we operate. Our reputation is dependent on a company culture where every one of us acts with the highest level of integrity, confidentiality, and honesty, and takes responsibility for our actions. Our board is committed to ensuring our company operates with the highest level of integrity and expects all employees to do likewise.

The Housing Plus Codes of Conduct and Code of Ethics and Opportunity for workplace participants, and the Code of Conduct for Directors and their associated strategic policies sets out the ethical behaviour expected of us. It will assist workplace participant in solving ethical dilemmas they may face in their working environment.

Commitment to an ethical culture within our organisation involves us capturing opportunities to increase the awareness of Housing Plus Codes of Conduct and Ethics making it part of our daily business decisions and actions. It is up to all of us to ensure the Codes become part of the operational fabric of our company. Successfully implemented, the Codes of Conduct, Ethics, and Equal Opportunity will result in:

- a) More effective compliance with relevant legislation, laws and company policy;
- b) More effective management and service delivery; and
- c) Maintenance of the integrity and reputation of Housing Plus.

The Housing Plus Codes of Conduct and Code of Ethics and Opportunity outline our key values and our expectations of you in our workplace environment. We expect every person within our organisation to uphold the key values and expectations of these Codes when acting on behalf of or representing Housing Plus

Yours Sincerely,

Karen Andrew
CEO of Housing Plus

Our Key Values

The Housing Plus Code of Conduct is underpinned by the following ethical principles of Legal Awareness, Commitment to Social Justice, Confidentiality, Disclosure of Interest, and Equal Opportunities (see Code of Ethics and Equal Opportunity). These principles are also detailed below in this Policy.

'All workplace participants of Housing Plus are expected to observe the highest standards of service, whilst operating with absolute ethics, professionalism, and commitment to business excellence. All Housing Plus workplace participants are also expected to uphold privacy and confidentiality at all times. In the delivery of services to clients, all workplace participants are to:

- **Care** – Respect stakeholders, clients, managers, and co-workers at all times and provide quality client care and service through engagement and empowerment. We will be transparent, approachable, and accountable in all dealings, both internally and externally to the organisation.
- **Excellence** - Provide skilled and professional services to our clients, and ensure that all staff and directors are diligent, ethical, maintain confidentiality and privacy and are committed to the business objectives of the organisation.
- **Diversity** - Committed to diversity and equality by delivering ethical, non-discriminatory, non-judgmental and culturally aware services both internally and externally to the organisation.'

This Code of Conduct provides guidance on the responsibilities of our company, our employees, and any third party acting on our behalf.

Responsibility in this context means that each individual takes responsibility for his or her actions. High ethical standards flow from the concept of us being "responsible" for our actions. Each individual who is a part of our organisation is expected to take responsibility for his or her own actions.

Our Working Environment

Housing Plus is committed to providing a safe and satisfying working environment in which everyone is treated fairly, and with respect, and where employment decisions are based on merit. Housing Plus has established various workplace standards so that it can meet these commitments.

Housing Plus' key commitments to our employees are to:

- Provide clear and fair terms of employment;
- Provide clean, healthy and safe working conditions;
- Remunerate fairly;
- Abide by our **Equal Opportunity Policy** which aims to ensure equality and diversity for all present and potential employees and not to discriminate on the grounds of disability, colour, ethnic origin, gender, sexual orientation, age, religion, political or other opinions;
- Encourage employees to develop skills and progress in their careers;
- Provide a culturally safe working environment; and
- Abide by our zero tolerance of any sexual, physical, or mental harassment or any other bullying of our employees.

Housing Plus expects all employees to:

- Comply with all applicable laws and workplace conditions, and to follow all reasonable and legal instructions given by management;
- Maintain strict observance of company policies, rules and procedures including the reporting of improper, unprofessional or unethical behaviours (including any breach of this Code);
- To disclose any perceived or actual conflict of interest, malpractice, fraud and corruption and possible violation of any law or regulations immediately and not use information or authority derived from employment with the company for personal gain;
- Respect company ownership of all company equipment, supplies, books, records and proprietary information, including manuals and any other material;
- To be responsible and observe the Workplace Health and Safety rules;
- Preserve confidential company information during and after termination of employment including client names, plans and decisions, information about employees and any other information that is

not public knowledge. Confidential information must not be used for personal benefit and must only be used in the ordinary course of business whilst employed;

- Adhere to Privacy and Confidentiality policies and procedures and be mindful of the need for respecting confidentiality, both when working in the workplace and when representing the company in the community;
- Never use their position, influence, and knowledge of confidential Company or client information, or access Company assets for personal gain or the perception of personal gain;
- Refrain from engaging in communication with any non-essential workplace participants or unapproved external parties;
- Not take or be under the influence of illegal drugs or consume alcohol in the workplace or consume excessively when representing the organisation at public forums or venues;
- Be loyal to and respect co-workers and the organisation by respecting diverse opinions, beliefs, and values of co-workers. Gossip, swearing, intimidating, fighting, bullying or partaking in sexual or other unlawful harassment in the workplace will not be tolerated and may lead to disciplinary action including termination of employment if proven;
- Maintain punctuality. Punctual attendance is essential to the efficient workflow and productivity of Housing Plus and as such, the Company expects a high standard of attendance and punctuality from its workplace participants.

Our Business Dealings

We are all responsible for Housing Plus maintaining the highest standards of ethics, integrity, and behaviour. We will be professional in carrying out all duties and in all dealings, by being competent, honest, courteous, fair, non-judgemental, and respectful.

Housing Plus' key commitments to our clients are to:

- Act honestly and fairly in our relationships with clients, support agencies and partners;
- Provide beneficial advice and services to our clients and ensure advice or service delivery is not malicious or harmful to our clients' feelings or livelihood;
- Provide products and services to the standards that have been agreed;
- Foster client engagement which is neither tokenistic or exploitive;
- Take all reasonable steps to ensure the safety of products and services we provide;
- Not engage in bribery or corruption; and
- Only discuss or disclose client information with parties inside and outside the work environment that are legally entitled to be in possession of such information.

Management and staff will strive to provide quality services for our clients, partners, and key stakeholders.

Our clients should expect to experience:

- Reliability - consistency of performance and dependability e.g. keeping to advertised office hours and appointment times; meeting time targets;
- Responsiveness - willingness, readiness and timeliness e.g. showing interest and being attentive when presented with a client's needs; and facilitating the most appropriate and effective solutions;
- Competence - possession of the required skills and knowledge e.g. accessing available training and only dealing with those issues and situations you have the expertise to deal with;
- Accessibility - approachability and ease of contact e.g. making sure the office can be reached by public transport, is wheelchair and stroller accessible; displaying information in relevant community languages;
- Courtesy - politeness and respect e.g. being pleasant and treating clients with dignity;
- Communication - listening and using language that is understandable e.g. staff communicate the policies and procedures of the organisation and listen carefully to what clients say they need;
- Credibility - trustworthiness and believability e.g. providing verbal and written information about the service that accurately reflects what is available;
- Provision of security - freedom from danger, risk or doubt e.g. confidentiality is maintained at all times with respect to client's personal files, information, matters and verbal discussions; security of tenure is protected; neighbourhood disputes are dealt with promptly;
- Understanding - making an effort to understand the real needs e.g. how a situation of domestic violence might affect a client;

- Provision of high quality 'tangibles' - the physical evidence of the service and appearance e.g. meeting needs by the allocation of appropriate services and products; keeping the reception area clean and welcoming.

Housing Plus' key commitments to our suppliers and contractors are to:

- Act honestly and fairly in our business relationships;
- Not engage in bribery or corruption;
- Not engage Housing Plus approved contractors or contractors carrying out works as instructed by Housing Plus, to carry out works on properties owned by employees or properties where employees have a direct interest in;
- Not to instruct or carry out any actions involving Housing Plus approved contractors or contractors carrying out works as instructed by Housing Plus that would result in a personal gain, being financial or otherwise;
- Encourage suppliers and contractors to abide by the principles of our Code of Conduct; and
- Endeavour to procure goods and services from those organisations demonstrating good ethical practice.

Responsibilities to Stakeholders

Communication

Housing Plus is committed to honest, accurate, timely, and open communication with all our stakeholders. We will be accountable to clients, potential clients, the local community, funding agencies, legal entities, and government for meeting the specific financial, legal, and social requirements and agreements related to the business and any associated projects the organisation may manage.

No information will be concealed from our auditors, and no director, officer or employee will take action to influence, coerce, manipulate, or mislead the company's auditors for the purpose of rendering the financial statements misleading.

Financial Accountability

Our key commitment to funders and the broader financial community includes:

- Exercising the Australian Accountability Standard as the Board's acceptable standard of care in preparing the company's financial statements;
- Delivering shareholder value through sustainable and efficient operation of the company;
- Sound reporting and risk management practices; and
- Accurate and timely disclosure.

Community, Environment and Sustainability

Housing Plus aspires to support our community and the environment. Our goal is to provide lasting social, environmental, and economic benefits to society. We strive towards the implementation and maintenance of management systems for sustainable development that drive continual improvement.

Housing Plus' key commitments to our community and the environment include:

- Acting responsibly towards our communities by striving to improve opportunities for all persons disadvantaged in their access to housing and support services;
- Working cooperatively and in partnership with services to develop referral networks and coordinated service delivery;
- Contributing to making the communities in which Housing Plus operates a better places to live and do business;
- Being sensitive to local communities' cultural, social and economic needs;
- Supporting ethical trade in our purchasing practices; and
- Protecting the environment through Housing Plus's efficient use of resources and minimisation of waste and pollution.

Code of Ethics and Equal Opportunity

Housing Plus Directors and staff will behave in ways that are consistent with this Code of Ethics and the principles of Equal Opportunity.

Ethical behaviour involves observance of legal minimums, moral standards agreed by the organisation and best practice guidelines endorsed by the wider sector. Staff and Directors must abide by the following principles in carrying out their duties for the organisation.

Legal Awareness

The legal parameters for any activity or action will be clearly understood in lay terms by the person performing the activity or making decisions related to it. Conscious effort will be made to ensure that nothing illegal (or with potentially illegal consequences) is done in the name of the organisation and that we operate with the highest level of probity.

Legal advice will be sought, by reference to printed resources or legal experts, whenever necessary to ensure the legality of actions, practices, or policies, in particular:

- All staff must be broadly familiar with the Residential Tenancies Legislation;
- The Chief Executive Officer, Executive Team and Senior Management must make themselves aware of their obligations and be conversant with relevant incorporation and employment legislation; and
- Everyone must be aware of the implications and comply with the requirements of Anti-Discrimination legislation.

All stakeholders including Directors, staff, and outside agencies must be aware of how to access the Housing Plus Fraud, Corruption, and Whistleblower Policies.

Unintentional illegal action will be rectified as soon as Housing Plus becomes aware of it. Intentional illegal action or illegal action resulting from incompetence or negligence will result in the disciplinary procedure being implemented and in extreme cases in criminal prosecution.

Commitment to Social Justice

Housing Plus aims to further the principles of social justice through a commitment to:

Equity: a fairer distribution of economic and social resources and power;

Access: fair and equal access for all people to services that is important for their quality of life and well-being;

Participation: maximising the opportunity for people to control and make decisions about issues and circumstances that directly affects their lives and their personal development; and

Rights: developing fairer and more comprehensive social, economic, political and civil rights for all people and maximising the ability of people who are traditionally marginalised or disadvantaged to achieve their rights.

Strive for 'Best Practice'

All staff and Directors will strive for the development of 'best practice' in all activities. This will involve a commitment to working closely with other organisations interested in the professional development of the social housing and welfare sectors.

Policies and procedures will be amended as required to reflect the most appropriate models of best practice. A basic best practice principle is that policies and procedures are implemented with consistency and equity. Policies and procedures therefore must be written transparent and accessible in order that they are known and understood by operational staff and managers, and publicly available to clients.

Observe Confidentiality: (refer Privacy Policy)

Confidentiality is an important principle in many aspects of the organisations work, particularly in client/worker and employee/employer relationships.

Directors and workplace participants will respect the confidentiality of information obtained in the course of carrying out their duties. Directors and workplace participants will not discuss any personal information

about staff, clients, members, or Directors outside the organisation, or inappropriately with anyone inside the organisation without their consent.

Directors will not have automatic access to personal information about clients and information about individual clients reported to the Board will not be identified by name or address. Directors cannot ask to view client information, except with the authorisation of the Board in connection with the resolution of a complaint or dispute, or service evaluation.

Nothing learnt about a client, including the fact of their contact or tenancy, will be passed on to anyone outside the organisation without that persons express consent. It will be explained to clients requesting that an individual worker keep something confidential, that confidentiality cannot be maintained by one worker, but may be observed by approved service staff. Debriefing with other workers about individual clients will occur to ensure that all workplace participants are able to deal with situations appropriately and efficiently.

Anyone requesting information about a client, including family members, other organisations, government departments, the Police, and the courts will be informed of the confidentiality policy and the requirements for adherence.

Referrals or discussions with other agencies about a client's situation and need/s will not be made without their express consent, and preferably in their presence.

In extreme circumstances, a breach of confidentiality may be deemed to be in the best interest of the client or the service. For this disclosure to occur, the matter must first be brought to the attention of either the Chief Operating Officer or the CEO before confidentiality is breached.

Clients will have access to any file or written record about them, and may request access to this information with reasonable notice. When providing a client with access to their records, care will be taken to protect the privacy and confidentiality of others.

Information about clients, including lists with names and addresses, personal files and notes, names on files or whiteboards will not be visible or easily accessible in public areas in the office or within offices where clients may be invited.

Declaration of Interests

Disclosure of interests concerns the potential for unprofessional conduct in carrying out the business of the organisation because of relationships and responsibilities those Directors and workplace participants have outside the organisation, or because of multiple roles and relationships between people inside the organisation.

Disclosure of Interests will be addressed by Directors and workplace participants strictly adhering to the Conflict of Interests Policy for Staff and for Directors and Officers (refer full Conflict of Interests Policy).

Political and Personal Activities

Workplace participants and Directors will be mindful that their involvement with external activities is not perceived to reflect badly on their ability to contribute to Housing Plus. Staff and Directors will bring to the attention of the CEO or Board Chairperson details of any affiliation with an organisation that may impact on their work or that may impact on the reputation of Housing Plus.

Secondary Employment

Secondary employment could, or potentially could be perceived to compromise workplace participants. Staff must request permission from the CEO before starting employment or a business outside their Housing Plus duties, prior to taking up secondary employment. This includes casual employment, work undertaken while on leave or running a small business. Permission will not be reasonably withheld if the outside employment/business does not adversely affect the performance of their Housing Plus duties or give rise to a conflict of interest.

Public Comment

Whilst everyone has the right as a private individual to make public comment and enter into public debate on political and social issues, workplace participants and Directors of Housing Plus will not publicly comment on behalf of Housing Plus unless authorised to do so by the CEO or Board in accordance with our media and communications policy.

Equal Opportunities

Equitable employment and service delivery policies and practices are essential to meet the objectives of the organisation. Successful staffing practices require equity in employment. High quality service delivery requires equity in access to housing, housing management and support services. These cannot be achieved without the full support of people involved in the organisation.

It is expected that everyone will take responsibility for fair, non-discriminatory behaviour in all dealings with each other, with clients, and for the development of policies and procedures that facilitate this.

Housing Plus practices Cultural Safety by respecting the cultural heritage of our staff and local communities. We will ensure the use of appropriate language and behaviours to avoid making staff, clients, and stakeholders feel uncomfortable, threatened, or shamed; and we support our client's right to make decisions about seeking culturally based services and support.

Discriminatory behaviour is often unlawful and always undesirable and will not be tolerated by Housing Plus. Staff and Directors are expected to act with respect for the diversity with Australian society and with particular regard for those groups within society that have traditionally experienced disadvantage or been marginalised or discriminated against.

Anti-Discrimination, Harassment, and Equal Opportunity compliance will be addressed by Directors and workplace participants strictly adhering to these policies.

Implementation

All Housing Plus Directors, Executive Team and Senior Management members are responsible for promoting compliance with these Codes of Conduct and Ethics and monitoring its applicability and effectiveness.

Awareness and Training

This Codes of Conduct for workplace participants and Directors is available on the Housing Plus intranet site. All workplace participants and Directors are required to read, understand, and work in accordance with this Code of Conduct as part of their induction. Annual review and re-commitment must also occur to ensure compliance and understanding.

Ethical awareness will be maintained by regular training sessions, and where necessary, workshops in which relevant issues will be discussed.

Compliance With The Law

All workplace participants must be familiar with the basic legal requirements that apply to their duties and responsibilities. Housing Plus will provide resources to assist workplace participants to become familiar with their legal obligations.

Reporting Unethical Behaviour

It is important that we all take responsibility for ensuring that the standards contained in the Codes of Conduct and Ethics are translated into action. If a violation comes to the attention of the workplace participant they are required to take some action. Turning a blind eye is a way of contributing or providing passive approval to an unethical situation. Therefore, we each have a responsibility to report unethical behaviour.

Workplace participants must bring the matter to the attention of the appropriate line manager. There may be occasions where it may be inappropriate to make a report to a line manager or there may be concerns about reprisals if an allegation is made. In these circumstances, the matter should be reported to an Executive Officer or if the matter involves an Executive Officer to the CEO.