



Code of Conduct

Adelaide Community Healthcare Alliance Incorporated

26 October 2020



Code of Conduct

Table of Contents

Message from the ACHA Chair	1
Code overview and values	2
Overview	2
ACHA's Purpose	2
Our Purpose	2
Vision	2
Mission	2
Values	2
What happens if you do not comply	3
Compliance with Laws, Rules, Regulations & Policies	3
Know and comply with all laws, rules, regulations and policies applicable to your position.....	3
Completion of mandatory training.....	4
Complying with healthcare and professional standards.....	4
<i>National Disability Insurance Scheme (NDIS)</i>	4
Complying with record keeping standards.....	4
<i>Change in personal circumstances</i>	5
Competition.....	5
Your workplace	5
Others at work.....	5
Equal employment opportunity and discrimination	6
Harassment or bullying	6
Workplace health, safety and wellbeing	6
Environment.....	7
Privacy	7
Confidentiality	8
Political and other activities	8
Grievances.....	8
Coaching, counselling and disciplinary process	9
Whistleblowers and reporting misconduct	9
Co-operation during investigations and audits.....	10
Information systems and other organisational resources.....	10
<i>Information systems</i>	10
<i>Other resources</i>	11
<i>Intellectual property</i>	11
Dealing with others	11
Dealing with stakeholders	11
Child safety / vulnerable persons	12
Gifts, financial inducements and bribes.....	12
Employee conflict of interest	13
<i>Working for others</i>	13
Media and public communications	14
Donations and sponsorships.....	14
Code administration	14
Responsibility for the Code	14
More information	14



Code of Conduct

Message from the ACHA Chair

The Adelaide Community Healthcare Alliance Inc (ACHA), is one of South Australia's leading health care service providers. Working in conjunction with Healthscope Operations Pty Ltd (Healthscope) as the Manager of our hospitals, ACHA has a clear mission to provide quality medical, rehabilitation, surgical and health related services in a safe and caring environment based on valuing relationships with all stakeholders and maintaining financial discipline:

ACHA has a vision which is to be a recognised leader of quality private health care services.

In delivering our vision, we know that when we provide service excellence for our patients, everything else takes care of itself. ACHA operates in an environment where safety and quality are paramount, comfortably balanced against our responsibility to our stakeholders.

The way our directors, managers and employees behave is crucial to ACHA's reputation among our stakeholders and the wider community and can directly enhance or reduce shareholder value.

Our Board and management are committed to our Code of Conduct (Code) which is based on our core values and on the expectations of our clients, members, and of the broader community. It complies with the law and with other guidelines on appropriate ethical standards.

Our Code outlines how ACHA expects its employees to behave and to conduct business. The term 'employees' also extends to the behaviour of management and to the Board of Directors.

The Code aims:

- to promote a high level of professionalism and provide a benchmark for ethical and professional behaviour throughout ACHA;
- to promote a healthy, respectful and positive workplace and environment for all our employees;
- to support our business reputation and corporate image within the wider community;
- to make employees aware of the consequences they face if they breach our Code.

Everyone at ACHA needs to be familiar with our Code, live our values every day in the workplace and, at all times, act and behave in a manner consistent with establishing trust and confidence in our organisation.

Mr Tony Johnson
Chair

Toll Free Ethics Hotline Number: 1800 718 510

Ethics Point Website: <https://acha.ethicspoint.com> or <https://achamobile.ethicspoint.com> (via a mobile device)

Email: whistleblower@acha.org.au



Code of Conduct

Code overview and values

Overview

Our Code helps you understand how ACHA expects you - as an ACHA person - to behave at work and at work related events, and how ACHA expects you to handle ethical issues so as to maintain the highest standards of integrity. The Code is not a set of absolute rules. Nor is it meant to cover every situation that might arise. Rather it gives you practical, useful, common sense guidelines that you can apply and follow in all situations.

The Code complements our corporate policies and procedures which apply to all ACHA facilities. If there is any inconsistency between the Code and another ACHA policy, then the policy overrides the Code.

You must comply with the Code and the documents that underpin it - this is part of your employment agreement with ACHA. A reference to the “employees” includes temporary employees, contractors and ACHA directors.

While the code is designed to ensure ACHA (and Healthscope) delivers on its commitment to corporate responsibility and sustainable business practice, it does not create any rights in an employee, client, customer, suppliers, competitor, ACHA Director, you or any other person or entity.

Everyone at ACHA is to behave in line with these guidelines in their everyday work. So you can do that, you need to read and understand the Code and the documents which underpin it. You can get a copy of these documents from:

- the intranet; or
- your manager; or
- your ACHA contact

If you do not understand anything in these documents, you need to check the point with your manager or ACHA contact.

ACHA’s Purpose

Our Purpose, Vision, Mission and Values encapsulates the underlying principles by which ACHA functions and emphasises ACHA’s focus on patient care. They influence all aspects of ACHA’s operations and provide staff with a sense of shared identity and cultural expectation.

Our Purpose

We work together for better care

Vision

To be the first choice for private health services for South Australians

Mission

We are a group of private hospitals in Adelaide that provides an integrated range of quality and consumer centred medical, rehabilitation, surgical and health related services in a safe and caring environment

Values

ACHA is a values-driven organisation which values relationships and insists that its people go beyond just complying with laws, with regulations and with basic standards of personal conduct. For this reason, our six values set the framework for the ethical and professional conduct we expect from each other and for the standards set in our Code of Conduct:

We will demonstrate:

- A passion for excellence
- A commitment to quality patient focused care



Code of Conduct

- Integrity, transparency, accountability, loyalty and respect in relationships
- The provision of a safe hospital environment
- A preparedness to innovate and change
- A commitment to financial sustainability

By understanding and living ACHA's values, we aim to create and sustain an organisation where we can all be proud of everything we do.

What happens if you do not comply

You must comply with this Code and our corporate policies and procedures (the laws that apply to your work).

It is your responsibility to read and understand these documents.

If you are an employee, and you do not comply with the Code or our policies and procedures, we may take appropriate disciplinary action against you.

Disciplinary action against an employee may include:

- disciplinary action up to and including ending your employment;
- notifying the relevant industry or professional regulatory agency;
- taking civil action; and/or
- referring the issue to a law enforcement agency.

If you are not an employee of ACHA and you do not comply with the Code or our policies or procedures, we may:

- end our relationship with you;
- notify the relevant industry or professional regulatory agency;
- take civil action against you and the organisation that we have a relationship with; and/or
- refer the issue to a law enforcement agency.

See: ACHA Policy - 4.05 Performance and Conduct Management

Compliance with Laws, Rules, Regulations & Policies

Know and comply with all laws, rules, regulations and policies applicable to your position

Many of ACHA's activities are governed by laws, rules, regulations and policies that are subject to change.

We expect you to make every reasonable effort to become familiar with the laws, rules, regulations and policies that apply to your work at ACHA, and to comply with them.

If you break the law while working at ACHA, then you will be held personally accountable. Ignorance of the law is not, in general, a defence to breaking the law. Therefore, if you have questions about the applicability or interpretation of certain laws, rules, regulations or policies relevant to your activities at ACHA, you should consult with your manager or ACHA contact.

You must prevent or stop illegal or undesirable behaviour to make sure ACHA is kept free from criminal influence or exploitation.

Wherever you work, if you observe misconduct, illegal activity or an improper state of affairs, you must immediately report it to your manager, ACHA contact or to the independent ACHA Ethics Hotline. . Our Whistleblowers Policy is additionally able to assist you.

The laws that govern our activities can be complex. So, if you are unsure about how a law, rule, regulation or policy applies to your work, then you must consult with your manager or ACHA contact.

See: ACHA Policy – 0.05 Whistleblower and below, page 9



Code of Conduct

Completion of mandatory training

We are committed to providing a safe workplace. A key way we can work towards a safe workplace is through providing training on workplace safety expectations, obligations and responsibilities.

We will identify training that you may require while you are working with ACHA. You are required to complete any training that we may assign to you or direct you to undertake from time to time.

Complying with healthcare and professional standards

You may be required to comply with particular professional standards in order to maintain registration or qualification as a professional as part of your work at ACHA, for example, if you are a healthcare practitioner.

If you are required to maintain ongoing registration or qualifications as a professional during your time at ACHA, it is your responsibility to ensure that you continue to comply with all applicable professional standards and other requirements to maintain your registration or qualification.

If you are unsure about the professional standards and other requirements required to maintain your ongoing registration or qualification, you should contact the relevant regulating or governing body in your State.

National Disability Insurance Scheme (NDIS)

In circumstances where the National Disability Insurance Scheme Code of Conduct applies to services being provided, you must:

- Act with respect for individual rights to freedom of expression, self-determination and decision-making in accordance with applicable laws and convention.
- Respect the privacy of people with a disability.
- Provide support and services in a safe and competent manner, with care and skill.
- Act with integrity, honesty and transparency.
- Promptly take steps to raise and act on concerns about matters that may impact the quality and safety of support and services provided to people with a disability.
- Take all reasonable steps to prevent and respond to all forms of violence against, and exploitation, neglect and abuse of, people with a disability.
- Take all reasonable steps to prevent and respond to sexual misconduct.

Complying with record keeping standards

Accurate record keeping is critical to ensuring ACHA complies with its legal and regulatory obligations.

ACHA's business records include financial information and information related to our patients and their care. It is critical that you help preserve our business records, follow the guidelines set forth in any document retention policies and comply with related legal and regulatory requirements.

To ensure the information we are relying on is correct, you must:

- accurately and clearly record information, including information relating to our patients and ACHA's operations;
- not tamper with any records or change information in order to falsify records or conceal something;
- ensure that you record information in a timely manner; and
- ensure that any information relevant to ACHA's operations is stored in accordance with ACHA's record keeping standards.

If you are responsible for keeping records and reports, you must keep them accurately and in line with the law. For some people, this includes:

- complying with accounting rules and controls;
- reporting expenditures accurately and on time; and
- being able to provide proper evidence as required.



Code of Conduct

These requirements also apply to all non-financial records, including employee files, leave records, time sheets, workers' compensation and environmental documents.

If you are notified that your documents are relevant to an anticipated or pending litigation, investigation or audit, you must follow the guidance set forth in the notification you receive from ACHA's Corporate Secretary, Chair of the ACHA Audit Committee, or anyone duly authorised by the Board of Directors, regarding retention of documents.

Change in personal circumstances

Changes to your personal circumstances may impact on your ability to work at ACHA.

If there are changes to your personal circumstances that impact, or have the potential to impact, your ability to work at ACHA, you must promptly inform your manager or ACHA contact in writing.

Examples of these types of changes include:

- being charged with or convicted of a criminal offence;
- loss of professional registration or qualification required to undertake your work at ACHA;
- failure to obtain a professional registration or qualification required to undertake your work at ACHA.

Competition

ACHA competes vigorously and ethically at all times in the industry sector in which we operate.

You must conduct all business competitively, honestly and ethically. You must never conduct business in a way that breaches competition laws. For example, under the national *Competition and Consumer Act 2010 (formerly known as the Trade Practices Act)* in Australia;

- you must not have agreements or understandings with competitors that restrict competition - such as exclusive supply or distribution arrangements;
- you must not attempt to misuse ACHA's market power to damage competitors;
- you must not use unlawful means to acquire a competitor's trade secrets or other confidential information; and
- you must not engage in misleading or deceptive conduct or collusive conduct - including understandings on prices, volumes and terms of sale.

Even a "nod and a wink" with a competitor can be a breach of your obligations.

If you are unsure about whether a proposed course of behaviour or conduct may breach competition law, you must consult with ACHA's Corporate Secretary or Chair of the ACHA Audit Committee (who may seek legal advice if required) prior to engaging in the behaviour or conduct.

Your workplace

Others at work

We are committed to provide a challenging, enjoyable and positive workplace in which everyone can achieve their full potential and can make a difference.

To help us achieve this, you need to be polite and courteous and you need to treat your colleagues in the workplace fairly, and with respect and consideration, in an environment free from harassment.

In particular, this means you must:

- not use indecent, offensive or abusive language;
- never threaten others; or
- not behave in a violent way - such as fighting with or assaulting others.



Code of Conduct

If you are concerned that someone you work with is, or might be, involved in misconduct, you are expected to report this, co-operate in any ACHA investigation and provide relevant information to management and authorised external parties.

Equal employment opportunity and discrimination

We value the diversity of our workforce and we strive to provide a work environment in which everyone is treated fairly and with respect.

To help us achieve this, you are expected to be tolerant and respectful of the cultural differences of everyone at ACHA, including ACHA people, patients, clients, their families and any visitors to our workplaces.

Our policies, procedures, work conditions and practices:

- treat and evaluate employees:
 - according to the results they achieve;
 - on the basis of their job-related skills, qualifications, abilities, aptitudes and behaviours; and
- do not directly or indirectly discriminate against employees as individuals or groups.

See: ACHA Policies – 4.23 Equal Employment Opportunity: Harassment and Discrimination and 0.12 Diversity

Harassment or bullying

ACHA does not tolerate workplace harassment or bullying. All directors, officers and employees must ensure that ACHA is a safe and respectful environment where high value is placed on equity, fairness and dignity.

At the same time, you and everyone else you work with must maintain acceptable standards of behaviour both at work and off duty, including at third party functions, and as well as when using social media..

You must never take part in:

- sexual or other forms of harassment that might humiliate, offend or intimidate another person; or
- workplace bullying.

We treat these types of misconduct very seriously. If you experience or become aware of discrimination, violence or harassment, you have a duty to report it. Complaints of discrimination, violence or harassment will be taken seriously and investigated. Any employee found to be harassing, acting or threatening to act violently towards, or discriminating against another individual, or any employee who knowingly condones the discrimination of, violence towards, or harassment of another individual, will be subject to disciplinary action up to and including termination for cause.

ACHA reserves the right to discipline you if you knowingly make a false accusation about an innocent party; however, you will not face retaliation for making a good faith report or assisting in the investigation of a complaint.

See: ACHA Policies – 4.23 Equal Employment Opportunity: Harassment and Discrimination and WHS-PRO-25 Bullying in the Workplace

Workplace health, safety and wellbeing

We are committed to providing a healthy and safe work environment with systems in place to identify, assess and control workplace health and safety issues. Our focus is on continually improving workplace health, safety and wellbeing with the aim to minimise hazards and risks.

All appropriate laws and internal regulations (including work health and safety laws) should be fully complied with. Everyone has obligations to assist in ensuring that this situation is maintained at all times.

You must:

- take reasonable care of yourself and your colleagues at work;
- comply with our workplace health and safety policies and practices;



Code of Conduct

- report hazards, accidents and safety incidents in a timely manner; and
- complete any safety training you are required to complete.

If you supervise, manage or control a workplace, then in a timely manner you must also:

- identify and report hazards;
- report incidents and accidents;
- conduct safety inspections; and
- make sure that patients, clients and their families, employees and others on site are not exposed to health or safety risks.

See: ACHA Policy – WHS–POL -01 Work Health and Safety and Injury Management

Environment

We aim to minimise how our business activities impact on the environment by:

- following responsible environmental practices; and
- complying with environmental laws and regulations.

You need to do whatever you can to minimise how your work impacts on the environment. We encourage you:

- to use water and energy sources responsibly;
- to use our resources properly
- to recycle appropriate materials and dispose of waste; and
- to use any necessary chemicals in an environmentally appropriate way.

If you are aware of, or suspect, an action that is not environmentally responsible or in breach of the applicable laws and regulations, report the matter in accordance with the 'Compliance with laws, rules, regulations and policies' section above.

See: ACHA Policy – 1.45 Environmental Management

Privacy

We respect and protect the privacy of our employees, patients and clients (and their families) and others. We collect personal information only if it is necessary, ethical and lawful to do so. We restrict access to employees' sensitive information. We will release that information only if we have the employee's consent (unless required by law).

ACHA collects personal information regarding individuals both inside and outside the organisation. This is necessary to effectively and efficiently administer and manage the operation of our business.

Personal information includes, among other things, sensitive personal, medical and financial information. We store and process personal information in a number of different ways in order to meet our legal, regulatory or other obligations as an organisation. ACHA is committed to the protection of personal and health information in accordance with the law.

If you have access to any personal information (including that of patients or clients, or other ACHA people), you must protect the privacy of that information. You must take all reasonable steps to ensure that personal information is accessed only by those individuals within ACHA that have a need to know the information to carry out their duties.

You should familiarise yourself with, and comply with:

- The privacy laws of Australia and, where applicable, the jurisdiction of your workplace; and report the loss or suspected loss of any personal information to your manager or ACHA contact; and
- Any Privacy policies and procedures which apply to ACHA generally or your workplace.

Privacy laws and policies may deal with matters such as the collection, use, storage and disclosure of personal information, direct marketing, surveillance, e-health records, healthcare identifiers, data matching, health research and individuals rights to access and correct their personal information.



Code of Conduct

See: ACHA Policy – 2.23 Privacy

Confidentiality

You are required to protect and keep confidential all information (whether physical or electronic) relating to ACHA's business. This includes information about our patients, clients and operations as well as information concerning our business, commercial arrangements and employees.

All of this information is to be delivered to ACHA promptly after your employment ceases or at any time upon ACHA's request. Your obligation to protect this information continues after you leave ACHA.

You must not disclose confidential information to anyone outside ACHA unless it is disclosed in the proper exercise of you performing your duties for ACHA, information that is disclosed with the prior consent of ACHA, information which is available in the public domain or required by law. In such a case, you must first discuss the proposed disclosure with your manager. You must never use confidential information for your personal benefit, for the benefit of a third party or to disadvantage ACHA.

While at ACHA, if you become aware of confidential information about ACHA or another entity that you know or suspect has been inadvertently disclosed, seek guidance from ACHA's Corporate Secretary or Chair of the ACHA Audit Committee before using or acting upon this information.

If you are not an employee of ACHA, you may also have other particular obligations of confidentiality in addition to the above obligations:

- if you are engaged directly with us, due to any terms of engagement between you and us; or
- if you are engaged through another organisation, due to the terms of engagement between us and that organisation.

These obligations of confidentiality apply while you work for ACHA and after our relationship with you ends or you leave the organisation.

See: ACHA Policies – 2.23 Privacy; 2.24 Release of Information; 2.505 Confidentiality Agreement Student Placements/Business Visitors and your letter of offer/employment contract Political and other activities

Political and other activities

We do not make direct contributions to any political party. However, we do attend lunches, dinners, conferences or other events with political parties. Our representatives sometimes make a financial contribution to attend those functions and events. In line with the law, we disclose all those contributions to political parties. All attendance at such functions should be disclosed to the CEO, Hospital Operations, ACHA and approved prior to attending.

In your personal capacity, you may (outside your work hours) be involved in any lawful political, community or social activities. We ask that you do not engage in actions that could cause someone to believe that your actions reflect the views or positions of ACHA, if that is not the case.

See: ACHA Policy 0.19 Anti-Bribery and Corruption

Grievances

We aim to achieve a safe, positive and productive environment in which our priority is the interests of excellent patient service. Raising and settling grievances is an important part of a culture of continuous improvement.

We encourage you to resolve grievances co-operatively. When grievances cannot be settled co-operatively, we use a confidential, stepped process. Through this process, we aim to resolve issues as soon as possible, starting at the first level of management.

See: ACHA Policy – 4.09 Grievances



Code of Conduct

Coaching, counselling and disciplinary process

We aim to achieve a safe, positive and productive environment for everyone. To achieve this, we need to promptly, constructively and fairly recognise, address, and correct inappropriate behaviour or performance.

When the performance or behaviour of a person falls short of our expectations set in their position descriptions, in departmental procedure manuals, in workplace policies and under this Code of Conduct, we may take action to address the situation.

In some cases, where appropriate, we may decide to take steps to directly address substandard or unacceptable performance or behaviour. This may involve coaching and counselling, verbal warning, written warning(s).

In certain circumstances, action taken in light of substandard or unacceptable performance or behaviour may include, if you are an employee, ending your employment, or, if you are engaged by another organisation to work with us, raising the behaviour or performance with the organisation that has engaged you.

ACHA also has legal obligations to notify the relevant industry or professional regulatory agency in instances of misconduct or unsafe practice concerning the professional practice of health practitioners.

See: ACHA Policy – 4.05 Performance and Conduct Management

Whistleblowers and reporting misconduct

We aim to achieve a culture of honesty and integrity in everything we do. We acknowledge the role of whistleblowers in helping to disclose misconduct which could threaten ACHA's integrity.

You are required to be proactive and promptly report any suspected violations of this Code, or any illegal or unethical behaviour that you become aware of.

Whistleblowers are people, usually employees, who disclose criminal behaviour, misconduct or an improper state of affairs - for example breaches of this Code and associated policies.

Our employees need to feel they can safely report crimes and serious misconduct. So, we:

- support whistleblowers from recrimination; and
- acknowledge the importance of protecting whistleblowers under the law where possible.

Occasionally, you might see someone at work doing something wrong, which may not seem to be serious misconduct or criminal activity. When deciding on whether to report this behaviour, you should use common sense and your own sense of what is right and wrong. You are encouraged to familiarise yourself with ACHA's Whistleblower policy before proceeding.

If you decide to report an incident or misconduct, you may raise the issue with your manager or ACHA contact. If the matter is too sensitive or if it involves the conduct of your manager or ACHA contact, you may speak to your supervisor's manager or ACHA senior management.

We encourage you to contact our internal Whistleblower Protection Officer (WPO) via whistleblower@acha.org.au to make a report. Any information you provide is dealt with in strict confidence (unless the law or a regulatory authority requires disclosure).

In the event you do not want to report violations to your manager or the ACHA's Whistleblower Protection Officer, you can always report a complaint through the ACHA's Ethics Hotline.

Our reporting hotline (the ACHA Ethics Hotline) (the Reporting Hotline) is managed by an independent third party called NAVEX Global. The Reporting Hotline allows anyone to call anonymously (if they so choose) to report suspected unethical, illegal or unsafe behaviour. The Reporting Hotline is available toll-free, 24 hours a day, 7 days a week. All reports are independently investigated with oversight by ACHA Internal Audit.

Toll Free Ethics Hotline Number: Australia: 1800 718 510

Ethics Point Website: <https://acha.ethicspoint.com> or <https://achamobile.ethicspoint.com> (via a mobile device)



Code of Conduct

No retribution or retaliation will be taken against any person who has filed a report based on reasonable grounds. However, making a report does not necessarily absolve you (if you are involved) or anyone else of the breach or suspected breach. ACHA reserves the right to discipline you if you provide false information or make an accusation you know to be untrue. This does not mean that the information that you provide has to be correct, but it does mean that you must have reasonable grounds to believe that the information is truthful and demonstrates a possible breach of this Code, ACHA policies or illegal or unethical behaviour.

If you believe that you have been unfairly or unlawfully retaliated against, you may file a complaint with your manager, ACHA's Corporate Secretary, Chair of the ACHA Audit Committee, Whistleblower Protection Officer (WPO) or the Reporting Hotline.

If you act in good faith when you make a report - even if you breach our confidentiality rule, then ACHA will not act against you. However, if you intentionally make a false or misleading report, then we will take appropriate disciplinary action.

See: ACHA Policy – 0.05 Whistleblower

Co-operation during investigations and audits

ACHA has responsibilities to properly investigate matters brought to our attention and we are obliged to provide accurate information when completing audits.

If we request your assistance with an investigation or an audit, you are required to fully co-operate. This extends to attending meetings, answering questions, and responding to allegations.

Employees must never conceal information from (i) an external auditor; (ii) the Corporate Secretary; or (iii) anyone duly authorised by the Board of Directors. In addition, it is unlawful for any person to fraudulently influence, coerce, manipulate or mislead an external auditor of ACHA.

Information systems and other organisational resources

Information systems

We use a range of information systems to run our business including voice mail, telephones, facsimiles, internet, intranet and email. We expect you to use these information systems which are available for business purposes, in line with the standards of behaviour set out in this Code. We also expect that you will not engage in personal social networking activities which may have an adverse effect on ACHA, other employees, patients or ACHA's reputation.

This means:

- you must not use our information systems or credentials to bully or harass people including people you work with, patients, clients, their families and others;
- you must not use our information systems or credentials to access, transmit or store offensive material;
- you must not use our systems to break the law;
- you must never use social networking sites to comment adversely about ACHA, the people you work with, ACHA staff, patients, clients or other person connected with our business; and
- you must ensure that comments or posts on any social media platform do not damage ACHA's reputation, commercial interest and/or bring ACHA into disrepute.

We expect you to protect the information communicated via, or stored on, our information systems.

You also need to safeguard the hardware, software and all data against damage, loss, theft, alteration and unauthorised access.

ACHA's information systems are organisation resources. We can, and do, monitor your use of these systems.

See: ACHA Policies – 7.10 Email Management & Retention; 7.01 Information Technology (IT) – Acceptable Use; 4.40 Social Media – Employee Use and 7.06 Information Security



Code of Conduct

Other resources

Our resources include money, property, equipment, information and intellectual property.

You may use our resources only for authorised business purposes and never for your own or anyone else's personal benefit.

You must take reasonable precautions to make sure no-one steals, damages or misuses any resources under your control. You may only use your ID, access cards and system passwords for authorised purposes.

Intellectual property

When you began working at ACHA, you assumed specific obligations relating to intellectual property as well as the treatment of confidential information.

Intellectual property means all types of intellectual property and includes ideas, inventions, documents and programs which relate to ACHA's actual or anticipated business, research or development that is suggested by, or results from, work or tasks you perform, or on behalf of ACHA. It includes copyright, registered patents, designs, trademarks, know-how, trade secrets, logos, business names, confidential information and similar rights and includes reports, policies, manuals and the logos and business names of ACHA and its facilities.

Any discovery, invention, secret process, business method, procedure or improvement made or discovered by you while in the service of ACHA in connection with or in any way affecting or relating to (any of) the businesses of ACHA or its associated companies shall be disclosed to ACHA and shall belong to and be the absolute property of ACHA. This includes but is not limited to the proprietary rights to intellectual property and trade secrets.

Subject to the law, this obligation applies no matter where and when – at work or after hours – such intellectual property is created. That intellectual property must be reported to ACHA, and the property must be protected like any other proprietary information of the organisation.

Subject to the law and relevant professional standards, you must:

- return all ACHA property including any documents or confidential information, when your employment, engagement or relationship with us ends or on the request of ACHA or its representative; and
- if requested by ACHA or its representative, destroy or delete any confidential information stored in electronic, magnetic or optical form so that it cannot be retrieved or reconstructed.

See: ACHA Policies – 7.10 Email Management & Retention; 7.01 Information Technology (IT) – Acceptable Use; 4.40 Social Media – Staff Use; and your letter of offer/employment contract

Dealing with others

Dealing with stakeholders

ACHA's stakeholders include everyone who has an interest in what we do. They include our patients and clients; the families and other interested parties of our patients and clients; doctors, Healthscope as the manager of our hospitals, members, suppliers, communities, regulators, government agencies and competitors, as well as our employees.

When you deal with stakeholders, you need to be aware that they may judge ACHA by the way you behave. You are to be professional, diligent, courteous and efficient at all times. You need to always aim to protect our good reputation and avoid harm to others, which may be caused by your neglect or misconduct.

If someone makes a complaint and you are responsible for dealing with it, you need to:

- handle the complaint with a positive and courteous attitude; and
- be determined to satisfactorily resolve it.

See: ACHA Policy – 1.08 Complaints Management



Code of Conduct

Child safety / vulnerable persons

We are committed to protecting and safeguarding the welfare of children, and vulnerable persons on our premises and in our care.

Children and vulnerable persons are defined as a people aged under 18 or other individuals who may be unable to take care of themselves or are unable to protect themselves against harm or exploitation.

While all people must be protected from harm, there are additional legislative and ethical considerations for protecting children and vulnerable people. These include:

- children and seniors;
- people with impaired intellectual or physical functioning;
- people from a low socio-economic background;
- people who are Aboriginal or Torres Strait Islanders;
- people who are not native speakers of the local language;
- people with low levels of literacy or education; and
- people subject to modern slavery, which involves human exploitation and control, such as forced labour, debt bondage, human trafficking, and child labour.

If you have concerns regarding a child's or vulnerable person's safety, you must:

- not ignore or disregard any suspected or disclosed child or vulnerable person's abuse or risk to safety;
- take all reasonable steps to ensure the child or vulnerable persons immediate safety and reduce any risk to them;
- speak immediately with management and together determine whether it is necessary to contact the appropriate authorities; and
- report the concerns to relevant authorities (where necessary).

You must maintain appropriate boundaries while caring for or associating with children or vulnerable persons whilst undertaking work at ACHA.

People working or volunteering with children in South Australia must, by law, have a Working with Children Check.

See: ACHA Policy - 4.36 Working with Children Checks for Employees Working in Child Related Work

Gifts, financial inducements and bribes

We must make our business decisions ethically, transparently and at arm's length - both in Australia and in overseas countries. So you need to exercise the utmost care when you give or accept any benefits. You need to remember that this behaviour may create a sense of obligation to, or conflict of interest with, the other person or organisation.

Gifts and entertainment given to or received from persons who have a business relationship with the ACHA are generally acceptable, if the gift or entertainment is modest in value, appropriate to the business relationship, and does not create an appearance of impropriety. In order to avoid any conflict of interest, gifts over the nominal value of \$250 must be referred to your manager and recorded in the ACHA Register of Gifts, maintained by ACHA's Chief Financial Officer or nominated delegate.

No cash or cash equivalent payments should be given or received. In addition, gifts must not be given to or received from public officials. Employees who do not comply with these requirements may be required to reimburse ACHA for the value of any gifts or benefits they make or receive on behalf of ACHA.

You must never offer or receive bribes, facilitation payments, inducements or commissions (this includes any item intended to improperly obtain favourable treatment or avoid unfavourable circumstances).

ACHA is strongly committed to preventing the use of its operations for money laundering, the financing of terrorism, or other criminal activities, and will take appropriate actions to comply with applicable anti-money laundering laws. Jurisdictions may publish lists of individuals and organisations that ACHA is prohibited from accepting funds from or distributing funds to under applicable anti-money laundering laws. Employees are



Code of Conduct

expected to use reasonable care to verify that counterparties are not owned or controlled by, or acting on behalf of, sanctioned governments, groups, individuals or others. This includes requiring counterparties to make anti-money laundering representations in documents with ACHA, which ACHA's Chief Financial Officer can provide upon request.

You must not do anything that is against the law or which might create an obligation or a real or perceived conflict of interest.

See: ACHA Policies – 1.13 Gratuities, Gifts and Conflict of Interest, and 0.18 Anti-Bribery and Corruption

Employee conflict of interest

If you are an employee, your primary duty is to us. So, we expect you to devote your work efforts to ACHA and to make sure that your behaviour at work is transparent and based on what is best for ACHA. .

To achieve this, you must always avoid having a real or perceived conflict of interest. A conflict of interest exists when:

- an employee's personal or private interests - or those of your family or friends - conflict with the employee's obligation to ACHA or ACHA's business interests or the interests of its patients, clients (and their families) and others;
- an employee's decisions lead to an improper gain or benefit to the employee's or an employee's associates.

You must never engage in activities or businesses that involve - or could look like they involve - a conflict of interest with ACHA.

Some common examples that illustrate actual or apparent conflicts of interest that you, as an employee, must avoid include:

- receiving or giving an improper personal benefit as a result of your position – an unreasonable gift is one in excess of \$250 in value under the Gifts, Gratuities and Conflict of Interest policy (unless acceptance is approved by the relevant manager and appropriately recorded);
- having a significant ownership interest or personal financial interest in any other enterprise if that interest compromises or appears to compromise your loyalty to ACHA;
- taking advantage of property, information, or other opportunities arising from your position at ACHA, including promoting any personal business interests to ACHA employees, patients or clients;
- any conflict of interest arising from a personal relationship [with any other employee within ACHA];
- any outside employment or activity that conflicts with your ability to properly perform your work for ACHA (including a position on the board of directors of another company or non-profit organisation);
- using ACHA's name or purchasing power to obtain personal discounts or rebates unless the discounts or rebates are made available to all employees.

It is your responsibility to tell your Manager about anything that could involve a conflict of interest (actual or potential). In particular, you should be aware of the potential for conflict in areas like purchasing, engagement of consultants or contractors, sales and marketing, and giving and receiving gifts, prizes and hospitality.

To avoid conflicts of interest, identify potential conflicts when they arise and contact ACHA's Corporate Secretary or Chair of the ACHA Audit Committee (who may seek legal advice if required) if you are unsure whether a conflict exists. Directors should consult with the Chair of their Board of Directors on conflicts matters. In addition, if you become aware of any conflict or potential conflict of another director, officer or employee, you should consult with ACHA's Corporate Secretary, Chair of the ACHA Audit Committee or the Chair of your Board of Directors, as appropriate.

See: ACHA Policy 1.13 Gifts, Gratuities and Conflict of Interest

Working for others

If you are an employee, you may only take on additional work outside ACHA (including working for a business in competition with ACHA) if:

- you disclose it to your manager prior to taking on the work;



Code of Conduct

- ACHA management determine that there is no conflict of interest in you taking on the work; and
- you receive written approval from ACHA management before you take on the work.

See: ACHA Policies – 1.13 Gratuities, Gifts and Conflict of Interest and your letter of offer/employment contract

Media and public communications

We aim to make our public communications fair, accurate, clear and consistent. To help us achieve this, only persons authorised under the Media Relations Policy may:

- to speak to the media;
- to provide information to the media;
- to make public comments on ACHA or health care industry matters.

If you receive a request for comments or information regarding an ACHA facility and you are not authorised to respond to the enquiry, you must refer to the General Manager of the facility or ACHA CEO, Hospital Operations.

Unless you have received prior written consent or are otherwise authorised, employees and associated parties must not participate in public forum discussions (including internet based forums and social media platforms) where the subject matter is related to ACHA/Healthscope, its competitors or the healthcare industry.

See: ACHA Policy – 1.17 Media Relations

Donations and sponsorships

We aim to provide a co-ordinated program of philanthropic support to improve the health and wellbeing of communities through our two strategic areas of support:

1. Improvement in health care;
2. Support for ACHA communities.

We encourage our employees to be involved in their communities. We recognise the outstanding efforts of employees who support local community organisations.

All requests for corporate philanthropic donations and sponsorships should be referred to your General Manager or ACHA CEO, Hospital Operations as appropriate.

See: ACHA Policies – 1.13 Gratuities, Gifts and Conflict of Interest and 0.19 Anti-Bribery and Corruption

Code administration

Responsibility for the Code

ACHA management are responsible for implementing the Code.

The ACHA Executive team is responsible for making sure the Code is regularly monitored and reviewed. They will work closely with line management and the quality and legal functions to update the Code as needed.

Business management teams must include the Code in new employee orientation and must conduct training and education about the Code as needed.

More information

For more information, see ACHA's corporate policies and procedures on the ACHA intranet.

As our corporate policies and procedures may change from time to time, you are responsible for making yourself familiar with any updates.