

## Code of Conduct and Behaviour Policy

<b>Approved by</b>	Board of Healthia Limited
<b>Approval date</b>	May 2023
<b>Next scheduled review</b>	May 2025
<b>Covered under policy</b>	<p><b>Entities:</b> Healthia Limited, My FootDr (Aust) Ltd, Allsports (Aust) Ltd, Extend Rehab Pty Ltd, iOrthotics Pty Ltd, Access Ortho Pty Ltd, DBS Medical Pty Ltd, Natural Fit Footwear Pty Ltd, The Optical Company Pty Ltd, BIM Physiotherapy Group Holding Limited, Motion Health Group Holding Limited (NZ) and any other entity that is a subsidiary of Healthia Limited (collectively referred to throughout this policy as Healthia)</p> <p><b>Who:</b> This policy applies to all Healthia staff and to people who work within Healthia including:</p> <ol style="list-style-type: none"> <li>1. Board of Directors of any Healthia entity and Board Sub-Committee Members</li> <li>2. Executive, managers, clinic class shareholders and employees (whether full time, part time, casual, permanent or temporary), and</li> <li>3. Volunteers, students, contractors and consultants</li> </ol>
<b>Related policies</b>	<ul style="list-style-type: none"> <li>▪ Code of Conduct and Behaviour Policy</li> <li>▪ Conflict of Interest Policy</li> <li>▪ Diversity and Inclusion Policy</li> <li>▪ Freedom from Abuse and Neglect Policy</li> <li>▪ Gifts and Benefits Policy</li> <li>▪ NDIS Code of Conduct</li> <li>▪ Social Media Policy</li> <li>▪ Whistleblower Policy</li> </ul>
<b>Related documents</b>	<ul style="list-style-type: none"> <li>▪ Ahpra and National Boards Code of Conduct June 2022</li> <li>▪ Australian Privacy Principles (APPs) in the Privacy Act 1988</li> <li>▪ Code of Ethics Speech Pathology Australia 2022</li> <li>▪ ESSA Professional Code of Conduct and Ethical Practice 2021</li> <li>▪ Good Medical Practice: A Code of Conduct for Doctors in Australia</li> </ul>
<b>Policy owner/s</b>	Group CEO and Managing Director

### Purpose

The purpose of this Code of Conduct and Behaviour Policy is to ensure all Directors, employees, volunteers, students, consultants and contractors of Healthia behave appropriately and practice standards of professional and personal conduct that are consistent with Healthia's values and uphold the public reputation of the organisation.

Healthia may amend or vary this Code of Conduct and Behaviour Policy, in its absolute discretion, from time to time.

### Scope

Healthia's Code of Conduct and Behaviour Policy applies to all Healthia representatives who work within Healthia including:

1. Board of Directors of any Healthia entity and Board Sub-Committee Members
2. Executives, managers, clinic class shareholders and employees (whether full time, part time, casual, permanent, or temporary), and
3. Volunteers, students, contractors, and consultants

The policy applies to all sites and services.

## Policy

This Policy outlines the required standard of acceptable conduct and behaviour that is expected of all Directors, employees, volunteers, students, consultants and contractors in the performance of their duties and interactions in the workplace. This required standard of acceptable conduct and behaviour supports Healthia's ability to maintain public trust and confidence in the integrity and professionalism of the services provided to the community, and our ethos as a leading allied health organisation.

This policy and the behaviours outlined within it are fundamental to Healthia building healthy and positive relationships with its patients, customers and other key stakeholders. The Code of Conduct and Behaviour Policy also governs the way in which employees, volunteers, students, consultants and contractors are to relate to other staff, professionals, patients, customers, visitors and stakeholders.

However, this Policy is not intended to provide a detailed and exhaustive list of what to do in every aspect of work. Instead, it represents a broad framework that will help guide conduct and behaviour in the performance of duties and interactions in the workplace.

## Responsibilities

All Directors, employees, volunteers, students, consultants and contractors of Healthia are responsible for:

- Being aware of and complying with this Code of Conduct and Behaviour Policy.
- Reporting behaviour that may be contrary to this Code of Conduct and Behaviour Policy and required standards of behaviour.
- Acting as a role model for the required behaviours and standards identified in this Code of Conduct and Behaviour policy.
- For helping to model Healthia's values of:

**Excellence:** We will pursue excellence in everything we do, by bringing diversity and innovation into health care, by taking care of our teams and the patients they treat, and by serving the communities of which we are a part.

**Everyone:** We will embrace a team approach that values collaboration and mutual respect for everyone, delivering exceptional results for patients and our fellow colleagues.

**Empathy:** We will always be understanding and supportive, giving patients the advocacy and excellence in health care that is specific to their needs through our collaborative health care approach.

**Education:** We are committed to both our own personal and professional development by engaging in a wide range of learning opportunities and to fostering a culture of continuous improvement.

- Complying with mandatory reporting requirements, including but not limited to, reportable incidents involving children and vulnerable people or other regulatory requirements.

In addition, Healthia's People and Culture team will be responsible for providing advice to employees, volunteers, students, consultants and contractors of Healthia, in relation to this Policy and its application.

## Policy Application

### Personal and professional behaviour

All Directors, employees, volunteers, students, consultants and contractors of Healthia are expected to maintain a standard of professional behaviour that maintains and promotes confidence and trust in the work that Healthia does.

As Directors, employees, volunteers, students, consultants and contractors engaged by Healthia, our personal and professional conduct must strive to create a harmonious, safe and productive workplace which models the organisational values. As Directors, employees, volunteers, students, consultants and contractors of Healthia it is incumbent upon us to:

- Uphold the highest standards of honesty and integrity in the conduct of our duties.
- Respect the dignity of the public, our patients, customers, key stakeholders and other employees by treating them with courtesy, honesty and sensitivity to their rights.
- Treat others in the workplace fairly and with respect.
- Exercise our best judgment in the interests of Healthia and our key stakeholders.
- Make decisions ethically, fairly and without bias using the best factual information available.

- Comply with any legislative, industrial or administrative requirements, and all lawful and reasonable directions given by persons in authority.
- Comply with all Healthia policies and procedures relevant to the person's position.
- Act responsibly in the event of becoming aware of any unethical behaviour or wrongdoing by any other employee and report such conduct or activities to the appropriate level of management.

### **Clinical standards of care**

All Directors, employees, volunteers, students, consultants and contractors of Healthia are expected to be familiar and comply with the codes and guidelines developed by the relevant National Registration Board, or equivalent National Professional body. These codes and guidelines seek to assist and support practitioners deliver appropriate, effective services within an ethical framework. All practitioners have a professional responsibility to be familiar with these codes and to apply the guidance they contain. These codes and guidelines may be used as evidence of what constitutes appropriate professional conduct or practice for the relevant professional discipline in proceedings under the National Law or a law of a co-regulatory jurisdiction against a health practitioner.

### **Professional Registration and other requirements**

All staff working within Healthia who are engaged to provide healthcare services must have and maintain their Ahpra registration, or the equivalent depending upon the health discipline including any other checks, certifications and/or requirements required by Ahpra or other governing body.

Staff working with NDIS participants, must also comply with all applicable rules and regulations relating to the provision of services to NDIS participants, including having and maintaining NDIS Worker Screening Checks.

### **Use of information**

Confidential information is information obtained or developed in the course of the conduct of Healthia's business and which, if disclosed, will or could lead to risk, damage or injury to Healthia, its patients, customers, employees and other key stakeholders.

All Directors, employees, volunteers, students, consultants and contractors must:

- Protect confidential information.
- Only access confidential information when it is required for work purposes.
- Not use confidential information for any unofficial or non-work purposes.
- Only release confidential information if authorised to do so.

Directors, employees, volunteers, students, consultants and contractors are only permitted to release confidential information in accordance with established policies and procedures. As a guideline, staff shall not give or release confidential information unless:

- Required to do so by law.
- Appropriate authority has been granted to release the information.
- The information is officially available to the public and is released in accordance with Healthia's procedures.

### **Conflicts of interest**

This Code of Conduct and Behaviour Policy should be read in conjunction with the Conflict of Interest Policy and applies to Directors, employees, volunteers, students, consultants and contractors. In addition, this Code of Conduct and Behaviour Policy considers appropriateness of certain personal relationships.

Under no circumstances are employees, volunteers, students, consultants and contractors permitted to develop personal relationships with patients and customers, including after-hours or through the use of digital and social media. This includes where the personal relationship develops under the following circumstances:

- Within a one-year period once the patient is no longer accessing Healthia's services.
- The imbalance of power inherent in the relationship between the Directors, employees, volunteers, students, consultants and contractors and the patient exists, and
- The patient is dependent on the Directors, employees, volunteers, students, consultants or contractors.

A personal relationship is an association between two or more people that may be based on liking, loving, some other type of social commitment or regular business interaction. Personal relationships may include a relationship between two parties that can have the unintentional effect of influencing judgment or behaviour or creating a perception of influencing judgment.

Where an employee, volunteer, student, consultant or contractor has a pre-existing relationship with a patient, this may lead to a conflict of interest and they must disclose this to their supervisor and the Conflict of Interest Policy must be followed. A plan should be put in place and approved by the Company Secretary to mitigate any potential conflict of interest. The relationship must not directly or indirectly compromise the performance of their duties or conflict with Healthia's interests at any point in time.

Furthermore, where a Director, employee, volunteer, student, consultant or contractor is involved in a decision relating to the selection, appointment or promotion of a person with whom they share a personal relationship, for example a family member, it must be immediately declared in writing to the Board prior to the decision being made.

Directors, employees, volunteers, students, consultants and contractors who engage in personal relationships between each other (including romantic and sexual relationships), should be aware of their professional responsibilities and will be responsible for assuring that the relationship does not raise concerns about favouritism, bias, ethics and conflict of interest. In cases of doubt, advice and counsel should be sought from your direct supervisor on the appropriateness of the relationship.

Romantic or sexual relationships between Directors, employees, volunteers, students, consultants and contractors where one individual has influence or control over the other's conditions of employment are inappropriate. These relationships, even if consensual, may ultimately result in conflict or difficulties in the workplace. If such a relationship currently exists or develops, it must be disclosed in the following manner:

- The supervisor or employee who has influence or control over the other's conditions of employment has an obligation to disclose his/her relationship to their supervisor or the CEO or the Board whichever is appropriate.
- The other employee involved in the relationship is encouraged to disclose the relationship to Human Resources.

Healthia treats any conflict of interest in this regard extremely seriously and any instance of non-disclosure may result in disciplinary action up to and including termination.

Please also refer to Healthia's Conflict of Interest Policy for further information.

#### **Use of Healthia's resources**

Healthia's equipment, funds, facilities and other resources are to be used:

- effectively, economically and carefully; and
- for the benefit of Healthia.

Minimal use of telephones, computers, faxes or similar equipment for private purposes is acceptable in accordance with established policies and procedures. Occasional, limited use of photocopiers may be permitted with the prior consent of the manager.

#### **Public comment**

All Directors, employees, volunteers, students, consultants and contractors must ensure that public comments (either verbal or written) made in a private capacity are not attributed as official comments of Healthia. In this regard, Directors, employees, volunteers, students, consultants and contractors are not permitted to use official stationery for private correspondence or for purposes not related to official duties. This prohibition extends to the provision of references for current and/or former staff members.

Directors, employees, volunteers, students, consultants and contractors should only publish information which is considered ethical and lawful.

Furthermore, Directors, employees, volunteers, students, consultants and contractors must abide by Healthia's Social Media Policy when using social networking sites and commenting on the organisation in any manner.

#### **Acceptance of gifts and benefits**

It is unethical for Directors, employees, volunteers, students, consultants and contractors to solicit any gifts, benefits or additional money for themselves or other Healthia Directors, employees, volunteers, students, consultants and contractors.

Under no circumstances are Directors, employees, volunteers, students, consultants and contractors to accept gifts or benefits, or any inducement which might in any way obligate, compromise or influence Healthia or that person in their official capacity.

This Code of Conduct and Behaviour Policy should be read in conjunction with the Gifts and Benefits Policy.

### **Secondary employment**

Healthia employees are permitted to engage in outside employment, provided that this employment does not have a detrimental impact on the employee's ability to meet the requirements of their role, adversely affect the employee's work performance or give rise to a conflict or potential conflict of interest or are a breach of their restraint.

Before engaging in work that could potentially raise a conflict of interest, employees must seek written permission from the Divisional CEO of their relevant business unit or the CEO. Approval will not be granted where the secondary employment involves or could involve a conflict of interest with Healthia-related duties or could reasonably be perceived by a member of the public to give rise to a conflict of interest.

Senior Executives are not permitted to engage in any secondary employment and must seek written approval from the Chairman of the Board before accepting any secondary employment or Directorships.

### **Responsibilities after leaving Healthia**

Directors, employees, volunteers, student placements, consultants and contractors must not disclose any official information after leaving Healthia that was non-disclosable during their engagement.

Former Directors, employees, volunteers, students, consultants and contractors must not use or take advantage of, personal, confidential or official information that they have obtained during the course of their employment. Furthermore, all Directors, employees, volunteers, students, consultants and contractors must be careful in their dealings with former employees and ensure they do not give them favourable treatment or access to personal, confidential or official Healthia information.

Furthermore, employees, volunteers, students, consultants and contractors must not use their position to advance their prospects for future employment, or allow their work to be influenced by plans for, or offers of, external employment which would conflict or compromise in any way the best interests of Healthia.

### **Promoting a diverse and inclusive workplace**

Directors, employees, volunteers, student placements, consultants and contractors must promote a diverse and inclusive workplace and adhere to the requirements of the Diversity and Inclusion Policy.

An individual must not directly or indirectly, or incite others to, engage in any of the behaviours that are contradictory to the Diversity and Inclusion Policy.

### **Healthia finances**

Employees must observe the highest standards of integrity in financial matters in accordance with relevant financial management legislation and established policies and procedures. This includes observing the highest standard of integrity when dealing with the finances of those services that attract a rebate, such as Medicare, Department of Veteran Affairs (DVA), WorkCover, Compulsory Third Party (CTP), private health insurance companies and the National Disability Insurance Scheme (NDIS).

### **Theft, fraud and corrupt conduct**

Healthia does not tolerate theft, fraudulent, dishonest, corrupt or improper activity or behaviour. All incidents of theft, fraudulent, dishonest, corrupt or improper activity or behaviour will be reported to the Board.

## **Failure to Comply with the Code of Conduct and Behaviour Policy**

Where it is established that a Director, employee, volunteer, student, consultant or contractor has breached this Code of Conduct and Behaviour Policy, they may be subject to disciplinary action, up to and including termination of employment or contract.

## **Authority**

This policy has been authorised by the Board of Directors.

## **Relationship with Other Policies**

- Code of Conduct and Behaviour Policy

- Conflict of Interest Policy
- Freedom from Abuse and Neglect Policy
- Gifts and Benefits Policy
- NDIS Code of Conduct
- Social Media Policy
- Whistleblower Policy

## Related Documents and Relevant Legislation

- Ahpra and National Boards Code of Conduct June 2022
- Australian Privacy Principles (APPs) in the Privacy Act 1988
- Code of Ethics Speech Pathology Australia 2022
- ESSA Professional Code of Conduct and Ethical Practice 2021
- Good Medical Practice: A Code of Conduct for Doctors in Australia

This policy supports compliance with the following legislations as amended:

- Age Discrimination Act 2004 (Cth);
- Anti-Discrimination Act 1991 (Qld);
- Australian Human Rights Commission Act 1986 (Cth);
- Criminal Code Act 1899 (Qld);
- Child Protection Act 1999 (Qld);
- Disability Discrimination Act 1992 (Cth);
- Equal Opportunity Act 1992 (Qld);
- Fair Work Act 2009 (Cth);
- Financial Accountability Act 2009 (Qld);
- Fringe Benefits Tax Assessment Act 1986 (Cth);
- Crime and Corruption Act 2001 (Qld);
- Work Health and Safety Act 2011 (Qld);
- Information Privacy Act 2009 (Qld);
- Public Interest Disclosure Act 2010 (Qld);
- Racial Discrimination Act 1975 (Cth);
- Sex Discrimination Act 1984 (Cth);
- Whistle-blowers Protection Act 1994 (Qld); and
- Workplace Gender Equality Act 2012 (Cth).