

Code of Conduct





Claro Code of Conduct

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Message from the CEO

At Claro Healthcare, our businesses are linked together through our focus on person-centric care. The health and wellbeing of our customers, our people, and our community is our reason for being.

This drives our purpose to provide quality care for people to live healthier, happier and more independent lives.

Given this, the success of our company relies on the confidence our customers and community have in the way we deliver our services. We have clear expectations regarding the conduct of our employees, contractors and consultants. These expectations are guided by our values and are outlined in this Code of Conduct.

and to model behaviours that reflect the values, ethics and reputation of our business. We are all responsible for our own conduct, and for speaking up if we see something that falls short.

On behalf of the Claro Healthcare Board of Directors and Executive Leadership Team, I look forward to delivering on our promise to provide quality care for people to live healthier, more independent, and happier lives, in a way that meets the expectations of our customers, community, and each other.

Kind regards,

Rob De Luca | CEO

Our CARE values:



About the Code

What is the Code of Conduct?

As an organisation, Claro Healthcare is committed to not only complying with our legal obligations, but also acting ethically and responsibly in relation to our customers, colleagues and the community.

For us to achieve the highest standards in customer experience and ethical behaviour, all members of our organisation should be working collaboratively and delivering services that are aligned with our company's standards and values.

With this in mind, the Code of Conduct sets out the way we work at Claro. This guide outlines practical principles and minimum standards of behaviour and conduct which are expected of us.

The Code describes our standards and values in how we work:

- to provide a benchmark for professional behaviour
- to support our reputation and image within the community
- to identify behaviour that is not aligned with our values and standards, and the actions that will be taken when this happens

The Code sets out our obligations in relation to:

- Our customers and community
- Expected behaviours and personal presentation
- Accountability and transparency
- Conflicts of interest
- Anti-bribery and gifts

- Privacy and confidentiality
- Protection of assets, resources, systems and IP
- Trust, accountability and transparency
- Insider trading
- Professional boundaries
- Modern slavery

If you have any questions about the Code, please speak to EGM People, Culture and Safety, Leanne Beveridge at leanne.beveridge@claro.com.au.

Who does the Code of Conduct apply to?

The Code applies to everyone who is employed by, works with or represents Claro Healthcare, including:

- Employees
- Support workers
- Agency staff
- Students on placement or work experience and other volunteers
- Contractors and consultants engaged by Claro
- Executive Leadership Team and Board of Directors

The Code applies to you whenever you are identified as a representative of Claro. This may include occasions when you are outside your normal workplace or working hours, such as work functions, out of hours work activities, or when you are out in the community representing the company.

We take the Code very seriously, so we should all familiarise ourselves and comply with it, and with the Claro policies, procedures and guidelines that support the Code.



About the Code Continued.

What happens if I breach the Code?

If you breach the Code, you should report it as soon as possible.

We understand that some breaches of the Code may be inadvertent. However, you should also be aware that some breaches may result in disciplinary action, including termination of your employment/engagement in the most significant cases.

When investigating a potential breach of this Code, we may contact relevant external authorities if we consider that the breach requires this kind of such action. Serious breaches may also result in us taking civil action and/or referring the issue to a law enforcement agency.

Our values, our brand

Guiding the Code of Conduct are our CARE values, which underpin everything we do. Our commitment to CARE for our customers and each other guides who we are, what we do and how we do it.

Customer

What we do

- We support our customers and build trusting relationships
- We make our customers and communities the focus of all we do
- We support our customers' independence and wellbeing

Accountability

Who we are

- We always hold ourselves accountable for our actions and reactions
- We bring our best selves to work
- We collaborate with each other and work as a team

Respect

How we do it

- We treat our customers and each other with care, kindness, and respect
- We provide a safe and inclusive environment for our customers and colleagues
- We have compassion and empathy for our customers and their individual stories

Excellence

How we make a difference

- We strive for excellence in everything we do
- We innovate and inspire each other
- We strive to continuously improve and learn

Scope

Code administration and compliance with the law, policies and procedures

The People, Culture and Safety function is responsible for ensuring that the Code is regularly reviewed and updated. The senior leadership group will ensure that everyone employed by, working with, or representing Claro has access to and adheres to the Code, as well as all other company policies and procedures.

Obligations and requirements

The Code is not intended to be read as a set of rules, and is not designed to cover every law, standard or Claro policy that might apply to you in your role.

While the obligations in this Code reflect our legal obligations, you should fully understand and comply with all laws and regulations relevant to your work. Ignorance of the law does not excuse Claro or you, as a Claro representative, from the obligation to comply.

You are also required to adhere to all Claro policies and procedures, instructions or directions that relate to your work with us.

If you need additional information or have a question relating to specific laws and regulations that apply to your duties, please speak to your manager.



Behaviour & Presentation

Other applicable codes and frameworks

As a provider of aged care and disability services, Claro must comply with additional standards set out in the Aged Care Act 1997 (Cth) and the National Disability Insurance Scheme Act 2013 (Cth).

Claro has endorsed and acts within the National Disability Services' Zero Tolerance Framework, which assists providers like us to establish and maintain practices that safeguard the rights of the customers we support.

Claro must also act within the NDIS Code of Conduct, which requires workers and providers who deliver NDIS supports and services to:

- Act with respect for individual rights of freedom of expression, self-determination and decision-making in accordance with applicable laws and conventions.
- Respect the privacy of people with disability.
- Provide supports 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 supports and services provided to people with disability.
- Take all reasonable steps to prevent and respond to all forms of violence against, and exploitation, neglect and abuse of, people with disability.
- Take all reasonable steps to prevent and respond to sexual misconduct.

The obligations in this Code reflect and support compliance with the NDS' Zero Tolerance Framework, the NDIS Code of Conduct obligations, and Aged Care Quality and Safety Requirements.

Commonwealth Modern Slavery Act 2018

Claro complies with the Commonwealth Modern Slavery Act 2018. Claro has undertaken an assessment of modern slavery risk, and is committed to sustainable development goals and actions across operations and supply chain.



Behaviour & Presentation Continued.

Our customers are the reason we come to work every day

We have the privilege of working with some of the most vulnerable people in the community through the support we provide, whether directly or indirectly. This means it is especially important to exercise the utmost care in the way we treat the people we serve and interact with.

It's important to make every interaction that we have with each other and with our customers a positive, respectful one that reflects our values and broader community standards.

We are all expected to consistently deliver a safe, high-quality and timely service, and to act professionally and ethically in our respective roles.

This means:

- Being punctual and attending work as required, and notifying managers of any absences as soon as possible.
- Working safely and following all workplace health and safety procedures at all times.
- Not using any personal electronic devices (mobile phones, tablets, etc.) during shifts unless it is for business purposes.
- Treating customers and each other with respect and according to our CARE values.
- Being sensitive to customers' cultural differences and backgrounds.
- Taking responsibility for our own actions.
- Watching out for each other.

Everything we do should ensure our customers have confidence in our services and provide their loved ones with peace of mind. If you have a customer-facing or direct care role, you should:

- Always apply a customer-centric focus to your work – treating customers with respect, empathy and compassion.
- Greet and interact with customers in a positive manner.
- Work within care plans and work plans – if a customer has a request that is not part of their care plan, check with your manager first.

Dress for your role

How you present yourself personally for work reflects on our business, so it's important to always maintain a professional image and to wear attire that's appropriate for your role.

This includes:

- Maintaining a good standard of personal hygiene and grooming.
- Making sure your work clothes or uniform are clean, in good condition, and task appropriate.
- Wearing your name badge while on shift (if relevant).
- Wearing appropriate personal protective equipment for your work (if relevant).
- Wearing footwear that is enclosed and fit for purpose - thongs are not appropriate.
- If you wear jewellery, ensuring it doesn't present a safety hazard.
- Being mindful of cultural sensitivities when it comes to visible body jewellery and tattoos.
- If you are in a direct care role, avoid long nails.
- Wearing smart casual clothing for 'casual Fridays', avoiding beach or gym wear.

Information Systems, Assets & Resources





Information Systems, Assets & Resources Continued.

Use of Claro systems, assets and resources.

We maintain a number of different information systems as part of our organisational resources, which help you to perform your role efficiently and effectively - for example, SharePoint or instant messaging services.

When performing your work, you might be required to use different information systems provided by our company. You should be aware that your use of these is monitored, so you should only use these systems for business purposes and in accordance with the requirements of this Code.

You should never:

- Use Claro' information systems to bully or harass others, including accessing, transmitting or storing offensive material.
- Use these information systems to break the law or violate any Claro policy.
- Be careless or negligent in protecting information communicated or stored on company information systems.
- Be careless or negligent in safeguarding hardware, software and data against damage, loss, theft, alteration, and unauthorised access.

Use of assets and resources

Using Claro' assets and resources in an efficient and appropriate manner is critical to our ability to be competitive and successful.

Company assets and resources generally include all office equipment and supplies, intellectual property and branding, confidential information, and cash and other financial facilities.

You should ensure all Claro assets and resources are used effectively, economically, and only for legal and authorised business purposes. You should also take all reasonable steps to ensure any company property and assets under your control are safeguarded from loss, theft and unauthorised use.

Make sure that an accurate and auditable record of all transactions relating to the use of company assets and resources is maintained in accordance with accepted accounting and business principles. Non-financial records (e.g. personnel files, customer information, environmental documentation, safety statistics, etc.) must also be securely maintained.

Unauthorised removal, sale, transfer or loan of any Claro assets (including cash, stock and equipment) or other resources will be regarded as theft and may result in disciplinary action, including termination.

Note that the obligations relating to the use of Claro assets and resources under this Code also apply to the use of customer assets and property.

Intellectual property

Intellectual property (IP) is proprietary knowledge that is protected under legislation and common law. Any IP that you develop during, or as a result of, your employment or engagement with us will be the property of Claro.

Additional IP created or developed by you or the company, many materials used in our business are protected by copyright laws, including:

- computer software
- compact discs and DVDs
- audio and video tapes
- trade journals, books and magazines
- presentation slides, training materials, management models, or other materials prepared by external consultants or organisations

You should not reproduce, distribute or alter any materials owned by Claro or a third party without the express permission of the copyright owner or authorised agent. For the sake of clarity, permission should be obtained every time these materials are used.

Company trademarks, business names, domain names, service marks, logos and slogans that are used in the course of our business are also valuable assets, and these must be protected from unauthorised use.

You should only use these with prior authorisation from Claro for legitimate business purposes and in a way that's consistent with our corporate style guide.

Privacy obligations

For the purpose of our business operations, we collect and hold personal and sensitive information that has been obtained from various people and groups including shareholders, customers, suppliers, employees, candidates, and public authorities.

Given this, maintaining privacy is of utmost importance. You should respect and maintain the privacy of all personal and sensitive information held by Claro, and only use this information in accordance with the privacy laws and applicable privacy principles.

In performing your role, you may be required to collect, use, or disclose personal and/or sensitive information. You may only collect, use and/or disclose this information if it is reasonable, practical and legal to do so and in compliance with all company policies and procedures.

Our policies and procedures exist to ensure that all personal and/or sensitive information is handled in accordance with the requirements of the privacy legislation that applies in the states and territories in which our business operates. You should comply with these policies at all times.

**Information Systems,
Assets & Resources
Continued.**

Confidential information

In your work, you may receive or have access to confidential information about our company, its business, operations, customers and suppliers. Examples of this kind of confidential information include, but are not limited to:

- company documents, books, accounts, processes or other 'know how'
- trade secrets
- IP
- price lists/cost sheets
- tender information including costings, margin analysis, scope analysis and related materials
- lists of customers
- customer records
- employee (personal) details
- details of marketing programs
- technical and systems information (inc. algorithms)
- information about suppliers
- computer systems
- business strategies and plans
- special methods of operation
- other information that is of competitive value to Claro

As unauthorised use or disclosure of confidential information could significantly compromise the interests of our business, our employees, customers and suppliers, it is everyone's responsibility to safeguard confidential information from loss, theft and unauthorised use.

You should not use or disclose our confidential information, whether this is deliberate, inadvertent or careless, other than as required to perform your role, unless you are specifically authorised to do so.

This includes not providing this confidential information to other business units in the company, or using the confidential information provided for a different purpose.

The obligation to maintain confidentiality is a condition of your employment or engagement with us, and continues after you leave Claro. If you are unsure whether the information you have access to is confidential, speak to your manager.

Public release of company information and social media

Don't make public comments, whether in the performance of your work or in a personal capacity which may be construed as representing the official views of our company.

Making public representations on behalf of Claro is a function limited to the Board, CEO, and authorised media spokespeople.

If you are invited to make public speeches on topics related to Claro or are asked by the media for comment, you must refer the request to the Head of Communications and Policy.

You also should not use social media as a forum to discuss work-related matters or share work-related images (with the obvious exception of private collaboration tools, such as Facebook Workplace and Yammer). Communicating with customers via social media, unless it is part of a customer's care plan, is a breach of the Code.

While Claro respects each individual's freedom of expression, we ask that you do not use social media to make negative or adverse comments about the company, its employees, customers or other people connected with the business, whether in the performance of your work or in a personal capacity. This may result in disciplinary action, including termination of employment in serious cases.

Information Systems, Assets & Resources





Ethical Business Conduct Continued.

Fraud, theft & corruption

Claro has zero tolerance for fraud, theft and corruption by people employed by, working with or representing the company.

Some examples of fraud, theft and corruption include:

- theft of cash, consumables or equipment
- falsification of records or timesheets (i.e. claiming payment for time not worked)
- falsification of expense claims (i.e. dishonestly claiming a business expense)
- falsification of invoicing (i.e. dishonestly providing invoices for goods or services not supplied in accordance with the description in the invoice)
- falsification of accounting (i.e. dishonestly allowing the reporting of incorrect or misleading financial results)
- using your position at Claro to achieve a personal gain contrary to the best interests of our company

Any incident involving fraud, theft or corruption will be referred to the relevant external agency for investigation and may lead to disciplinary action, including termination of employment.

Bribes

We have zero tolerance towards all forms of bribery.

You might, at times, be pressured to make payments or payments in kind to induce others to act in favour of the company.

The offering of bribes to individuals or entities to win business or to influence a business decision in Claro' favour is prohibited.

Making or requesting such payments could compromise everyone involved, and may expose Claro, you and others to criminal prosecution and serious penalties.

Receiving gifts or entertainment

You should exercise the utmost care with receiving gifts or entertainment from people or organisations that do business with Claro.

Gifts include the provision of goods or services, personal favours, gratuities, or other personal or financial gains.

Accepting gifts up to the value of AU\$100 is generally acceptable in situations where it accords with normal business practice (i.e. where the exchange of gifts is customary, and the gifts are appropriate for the occasion). Please note, gifts of \$100 or more must be declined by everyone across Claro Healthcare.

You should disclose all gifts received with a value of AU\$100 or less (value of a single gift or the total value of gifts received over a 12-month period) to your manager and record the gift/gifts in the gifts register.

You should only accept or provide entertainment (e.g. lunches, dinners, sporting events, arts and theatre) for customers and business associates where the nature and value of the entertainment is reasonable in relation to the nature and value of the business relationship with the company and the seniority of the people partaking in the entertainment.

Where the receipt of a gift or entertainment could create an obligation or expectation that could conflict or be perceived to conflict with your work at Claro, it should be refused.

Conflicts of interest

Avoid placing yourself in a position where your personal interests interfere, whether directly or indirectly, with your obligations to Claro.

An actual, potential or perceived conflict of interest can arise where you have a personal, family or associated private or commercial interest that may interfere with or influence the performance of your duties and responsibilities in an unbiased manner or contrary to the interests of Claro, its suppliers and customers.

Some examples of conflicts of interest include:

- Witnessing legal documents for a customer
- Accepting a loan or giving a guarantee for a loan to a customer
- Selling goods and services to a customer, including raffle tickets, party plan selling, and donations to fundraising events
- Asking for money or donations from a customer
- Being involved in or having a significant ownership or personal financial interest in other enterprises where a conflict may arise with your obligations to Claro
- Participating in activities or discussions where there may be a conflict with your duties and responsibilities to Claro
- Soliciting or receiving benefits such as cash, gifts or entertainment in connection with, or as a reward for, any service or business of Claro, where this could be interpreted as having affected your objectivity in making a business decision made on behalf of the company
- Taking advantage of property, information or other opportunities arising from your position in the company

- Conflicts arising from a family, business or personal relationship or from activities outside employment (such as involvement in community activities and professional organisations)
- Use of company contractors for private purposes where you are involved in the subcontractor review or the accreditation process, or able to influence the allocation of work to those contractors

Where there is an actual, potential or perceived conflict, you should take reasonable steps to manage or remove the conflict to avoid detriment to our company or customers. Any conflict of interest must be reported to your manager or, in the case of directors or the CEO, to the Board.

You should note that specific disclosure or approval requirements might arise regarding conflict of interest situations under company policy, the corporation's legislation or local regulations.

Outside directorships

Everyone employed by or representing our company (other than Non-Executive Directors) should obtain the approval of the CEO prior to accepting a directorship in another business, statutory authority, or similar body. In giving approval, the CEO will consider whether the intended directorship will interfere with your ability to fulfil your role with us in an unbiased manner and whether any conflict of interest arises.

The acceptance of outside directorships by Non-Executive Directors is governed by the Board Charter and Corporate Governance Guidelines.

Directorship of entities established for the management of employee, contractor and family assets are excluded from this policy, provided there is no actual, potential or perceived conflict of interest.

Ethical Business Conduct Continued.

A Safe and Sustainable Workplace

Trade practices

We are committed to preventing anti-competitive conduct and encouraging free and fair competition. Our compliance with the Consumer and Competition Act 2010 (Cth) is a critical part of this and promotes ethical business practices and competition by Claro. We promote a cooperative relationship with the relevant regulatory agencies.

Trade practice laws apply to everyone in the workplace. You must not contravene any relevant trade practices laws or authorise or condone contravention of these laws by others. Contravention cannot be justified by claims of ignorance, good intentions or failure to seek legal advice, and will be regarded as a serious breach of the Code. Where the impact of the law is uncertain, you should seek appropriate legal advice and act on an informed basis.

Insider trading

The Corporations Act 2001 (Cth) prohibits the trading in shares, options, debentures (including convertible notes), and other securities of a company by any person who has undisclosed, price sensitive information regarding that company. The Act imposes substantial penalties on people who breach those provisions.

Relationships with government

Our ability to conduct business is affected by government decision-making, and government entities may potentially be major customers of Claro. We maintain an impartial position when engaging with all levels of government and promote a cooperative relationship with relevant regulatory agencies.

Do not offer any government or other public official any gifts or gratuity in exchange for favourable treatment, regardless of whether that treatment seeks to treat you as an individual, or the company, favourably. If you have any questions in relation to interacting with government officials, please refer to your manager.

We understand that you may wish to participate in your country's political process in a private capacity. In doing so, you should ensure that it is made clear that your actions and opinions are your own and not representative of the company.

Community engagement and corporate citizenship

We seek to actively support the community we're a part of. We encourage you to support and contribute to the local community and seek opportunities on how we can continue to improve our contribution to the community and our standing as a good corporate citizen.

You should also ensure your behaviour (both in a professional and personal capacity) is respectful of the broader community in which we operate and compliant with all relevant laws and regulations.





A Safe and Sustainable Workplace Continued.

Workplace health and safety (WHS)

Safety is everyone's responsibility. We aim for a culture of zero harm that fosters your health, safety and wellbeing, and encourages a safe, cooperative environment where we thrive and look out for each other.

Claro' Safety Golden Rules define the minimum expected safety behaviours for all employees. Under these rules, you must:

1. Report all incidents immediately or at the end of your shift - including hazards and near-misses - to your leader or through our incident notification process
2. Only do the tasks you are trained and able to do
3. Make sure to follow our Code of Conduct (this document).
4. Do you see any hazards or risks? Make sure you, and those around you, are aware of any in your workplace, site or client's home
5. Follow our CARE Values at all times
6. Make sure to follow hazardous manual handling guidelines
7. Drive carefully and always obey the road rules
8. Only attend work if you are fit, well and able to do so
9. Always respect others and treat them with dignity so they feel safe at work

The Chief Executive Officer is our company's Chief Safety Officer and management at all levels are required to contribute to the health, safety and wellbeing of everyone in the workplace.

Our internal PCS team is responsible for regularly reviewing PCS practices and policies, and for supporting you to resolve issues if and as they arise.

You are responsible to:

- Protect the health and safety of yourself and others when at work
- Perform your assigned duties in accordance with accepted safe working practices relevant to your business unit
- Provide management with any information which will contribute to the protection of the health and safety of all people in the workplace
- Follow and comply with all safety requirements of our Safety Management System whilst performing your work
- Report all safety hazards and incidents in accordance with our reporting processes

Equal employment opportunity

We recognise that our people play a significant role in our ability to be successful and sustainable, and are committed to building and maintaining a positive, inclusive culture that attracts skilled, engaged employees.

The recruitment, advancement and remuneration of all employees is determined on merit without discrimination or bias.

We aim to positively promote and make employment opportunities available to people who face barriers to employment entry or who are typically disadvantaged in the workplace. To this end, we have in place workplace programs to support entry into employment and will also, from time to time, enter into contractual commitments with customers which aim to positively promote diversity in employment.

Sustainability and the environment

We maintain a strong commitment to ensuring our business activities don't negatively impact the natural environment and are proactive in reducing our environmental impact.

We take a broad and long-term view of sustainability through informed and balanced decision-making processes, considering environmental, social and governance elements. We aim to achieve a high standard of environmental performance by complying with relevant legislation and through continuous improvement.

We seek to minimise our impact on the environment in terms of waste, water usage, energy usage, and air quality. This means that we:

- reduce, re-use and recycle materials wherever possible, within the constraints of privacy and confidentiality
- dispose of waste in the most environmentally friendly way, including using recycling bins in our offices and work places
- where possible, print documents double sided or view them electronically
- where safe, turn off lights when buildings/rooms are unoccupied
- use environmentally friendly cleaning agents and chemicals
- are mindful of the environmental impact of our activities and choices

We each have a responsibility to protect the environment. If you are aware or suspect that certain business practices or actions are not being implemented in an environmentally responsible manner, please speak to your manager.

Alcohol, drugs & tobacco

You should not be impaired by illegal or legal drugs (including alcohol) while at work or when conducting company business.

Misusing controlled substances or alcohol, or selling, manufacturing, distributing, possessing, using or being under the influence of illegal drugs on the job will not be tolerated and may result in disciplinary action, including termination of employment in serious cases.

Smoking tobacco is not permitted in our company's premises and workplaces, with the exception of approved designated areas.

Unacceptable behaviour

We have zero tolerance for harassment, bullying, discrimination, victimisation and other forms of unacceptable behaviour as a part of our commitment to our employees and to workplace health and safety.

Any behaviour that involves intimidation or harassment to another person, or is oppressive, persecutory or causes fear or stress in another, is bullying behaviour. You have a right to be free from such behaviour, which includes sarcasm, threats, verbal and physical abuse, coercion, punitive behaviours, isolation, "ganging up", nit-picking and other behaviours which cause humiliation and harm.

You have the right to question and to escalate any genuine circumstance where you believe you have observed or been subjected to unacceptable behaviour in the workplace. Employees who report instances of unacceptable behaviour must not be victimised for doing so.

Infection free workplace

We provide a safe workplace for our people, and expect our staff to undertake preventative hygiene activities and infection control training, where applicable.



A Safe and Sustainable Workplace Continued.

Unacceptable behaviour at work includes, but is not limited to:

- Working or behaving in a manner that places you or others at risk of injury or harm.
- Bullying, harassing, or otherwise acting or communicating in a threatening or intimidating manner towards colleagues and customers, including using abusive language or intimidating body language.
- Possessing or being under the influence of alcohol or illegal drugs whilst at work.
- Misusing or wilfully damaging company or customer property.
- Forming inappropriate emotional, social or intimate relationships with customers.
- Inappropriately using social media, information systems and other company assets.
- Posting inappropriate, false or malicious comments or materials online regarding our company, employees, customers and representatives.
- Failing to provide Claro with an original or certified copy of a Police Certificate (also known as a National Criminal History Record Check or a National Police Certificate) at least every three years or as required.
- Failing to disclose to us in writing, of any conviction of a precluding offence in the three-year period between obtaining and renewing police certificates.
- Failing to disclose to us in writing, of any changes to working rights in Australia which may preclude you from performing your contractual terms of employment/engagement.



Conflict Resolution



Conflict Resolution Continued.

Conflict between people can be a normal consequence of human interaction, but you are expected to respond appropriately and reasonably when these situations arise. Recurring interpersonal conflict can significantly impact on team morale and may compromise the provision of quality services, employee safety and wellbeing, and compliance with our policies and procedures.

If you are unable to resolve conflict within the workplace, you are encouraged to escalate the matter to People, Culture and Safety for assistance.

Reporting grievances

Grievances are wrong-doings that cause resentment and are grounds for complaint. You have a right to report practices or behaviour that is inconsistent with this Code, our company's policies and procedures, or applicable laws and regulations.

To report any grievances, including where you know of, or have good reason to suspect, an unlawful or unethical situation or consider you have observed or been subjected to unacceptable behaviour, you should immediately report the matter through any of the following channels:

- Your immediate manager
- Senior management (i.e. your manager's manager) up to and including the Executive General Manager

The appropriate person and the course of action to be taken to investigate and resolve a concern will depend on the nature of the issue and its severity. Some situations, such as those involving significant legal or financial issues, may require advice and input from professional advisers.

Protected disclosure (whistle-blowing)

Where you report a grievance under the Code, your calls, notes, emails and other communications will be handled confidentially and your privacy will be protected unless you agree otherwise, or we are legally compelled to disclose any such information.

Claro is committed to protecting any employee who in good faith raises concerns or assists someone to make a report related to the violation of this Code.

It is a breach of the Code for any person representing Claro to cause disadvantage to, or discriminate against another, who makes a genuine report under the Code (the whistle-blower).

Examples of disadvantage and discrimination include:

- reprisals, harassment or victimisation
- demotion or dismissal or loss of opportunity for promotion
- current or future bias

For further information, please see Claro protected disclosure policy.

Professional Boundaries & Obligations of Care Workers & Health Professionals





Professional Boundaries & Obligations of Care Workers & Health Professionals Continued.

Everyone has the right to be respected, to feel safe, and to be free from abuse. Abuse is a violation of a person's human rights and may take several forms, such as financial abuse, emotional abuse, physical abuse, sexual abuse and neglect.

We stand for zero tolerance of abuse of both our employees and customers.

A professional relationship exists where:

- A professional service is provided.
- Particular skills and qualifications are required.
- The relationship exists for a period of time.
- The service has a cost.
- Codes of behaviour and conduct exist.
- You come together for professional reasons.
- There are responsibilities and expectations regarding trust and ethical behaviour.
- You provide 'reasonable' notice periods when you require leave or to resign.

Boundaries are crossed when:

- You disclose details of your personal life or employment to a customer.
- You swap contact details with customers or interact using social media.
- You invite a customer to a personal party or social event.
- You take a customer to your home.
- You take friends or family members to the customer's home.
- You accept an invitation from a customer to a personal party or social event.

- You borrow items from customers.
- You use touch that is not essential to doing your job.
- You do additional tasks outside the care (service) plan or at the customer's request.
- You discuss particular details or gossip about other support workers with customers.
- You discuss company business activities or decisions with customers.

Simple rules for keeping boundaries

- Do not seek out a personal relationship with your customers or their loved ones.
- Do not introduce customers to your own family or friends.
- Do not socialise with your customers or their family, friends outside of work hours.
- Do not supply or use alcohol, drugs or other illegal substances during work.
- Be on time for your shift and complete the full shift.
- Do not smoke in front of customers, and do not lend or buy cigarettes for your customers (unless in the care plan).
- Do not smoke immediately before entering a customer's home.
- Do not borrow, ask for or lend money to customers.
- Do not talk about your personal, financial or life problems with customers.
- Do not ask for or take money, gifts or special favours from your customers.

- Do not allow customers to drive your own/work motor vehicle.
- Do not give advice outside of your skills and expertise (financial, relationship, medical etc); refer on to qualified professional for support needed.
- Respect confidentiality and privacy – do not discuss information about your customers with your family or friends. Talk to colleagues and use peer supervision.
- Do not disclose personal information (yours, colleagues' or other customers')
- Do not use your mobile telephone for non-work reasons whilst on shift.

Obligation 1:

You must provide services without engaging in abuse, exploitation, harassment or neglect.

To meet this obligation, you must:

- Treat our customers with dignity and respect and uphold their human rights.
- Never abuse, exploit, harass or neglect a customer.
- Always take action to ensure a customer you have reason to believe may have been abused, exploited, harassed or neglected, receives appropriate support (for example, medical support, counselling and support to report abuse to the police).
- Actively listen to customers (and their families, carers and advocates) to deliver support with their interests and needs in mind.
- Support customers to meaningfully engage with their local community and society.
- Exercise professional and ethical judgement when providing services.

Obligation 2:

You must report any form of abuse or suspected abuse.

- Zero tolerance of abuse of customers requires support workers to report any form of abuse. Reporting in this context means reporting to your manager. Reporting to other authorities should occur in line with our reporting policy and procedures.
- This includes reporting any abuse committed by colleagues, other workers, family members, carers, people with a disability or community members.

To meet this obligation, you must:

- Take all allegations of abuse seriously.
- Report any abuse or suspected abuse to your manager and, if necessary, other relevant authorities in line with our reporting policy and procedures. This includes reporting incidents that raise concerns about the support provided by another worker.
- If you think the company has not acted on your first report and a customer is at risk, report the abuse or suspected abuse to other authorities such as the Disability Services Commissioner (www.odsc.vic.gov.au) or similar for your state, or use the Speak Up service. To access the Speak Up service, you can make a secure online report 24/7 at www.yourcall.com.au/report quoting (AHC's ID is AHCS2OI5) or you can telephone the Your Call confidential alert line on 1300 798 101.
- Facilitate access to independent support, such as an advocacy service or the Office of the Public Advocate, where a person's rights are not being upheld.
- Participate in training, information sessions and supervision provided by Claro that assists you to understand what abuse is and its various forms, and the application of the Code.

Professional Boundaries & Obligations of Care Workers & Health Professionals Continued.

Obligation 3:

You must not engage in sexual abuse or misconduct and must report any such conduct by other workers, people with a disability, family members, carers or community members.

All forms of sexual misconduct and sexual abuse are unacceptable and are a violation of the Code.

To meet this obligation, you must:

- Always report sexual misconduct and abuse.
- Recognise the power imbalance between you and a customer receiving your support and how this affects the kinds of behaviours that are appropriate.
- Never engage in any sexual conduct with a person who you support, including actions committed by force, intimidation, coercion or manipulation.
- Never engage in any form of sexual activity or behaviour with a person who you support. This includes sexual advances and sexual or personal comments.

Obligation 4:

You must show respect for cultural differences when providing services.

Cultural respect involves recognising and valuing the diversity of people and creating an inclusive environment where it is safe for customers to express their cultural, religious, sexual and gender identity.

To meet this obligation, you must:

- Be aware of and actively listen to the expressed needs, values and beliefs of people from cultural, religious and ethnic groups that are different from yours about culturally relevant needs that affect the delivery of support services. This includes people with a disability, their families, carers and advocates.

- Consult with families, carers, advocates and other supports to clarify cultural expectations when these are unclear or not currently being met.
- Respect religious or spiritual beliefs and practices that differ from your own.
- Ensure cultures that differ from your own are acknowledged and respected.
- Use the names and pronouns that customers ask you to use (which may differ from their given name or assigned gender).

Obligation 5:

You must act ethically, and with integrity, honesty and transparency

Acting ethically means upholding professional obligations while providing support services and avoiding situations that will violate community standards and the expectations of those receiving support.

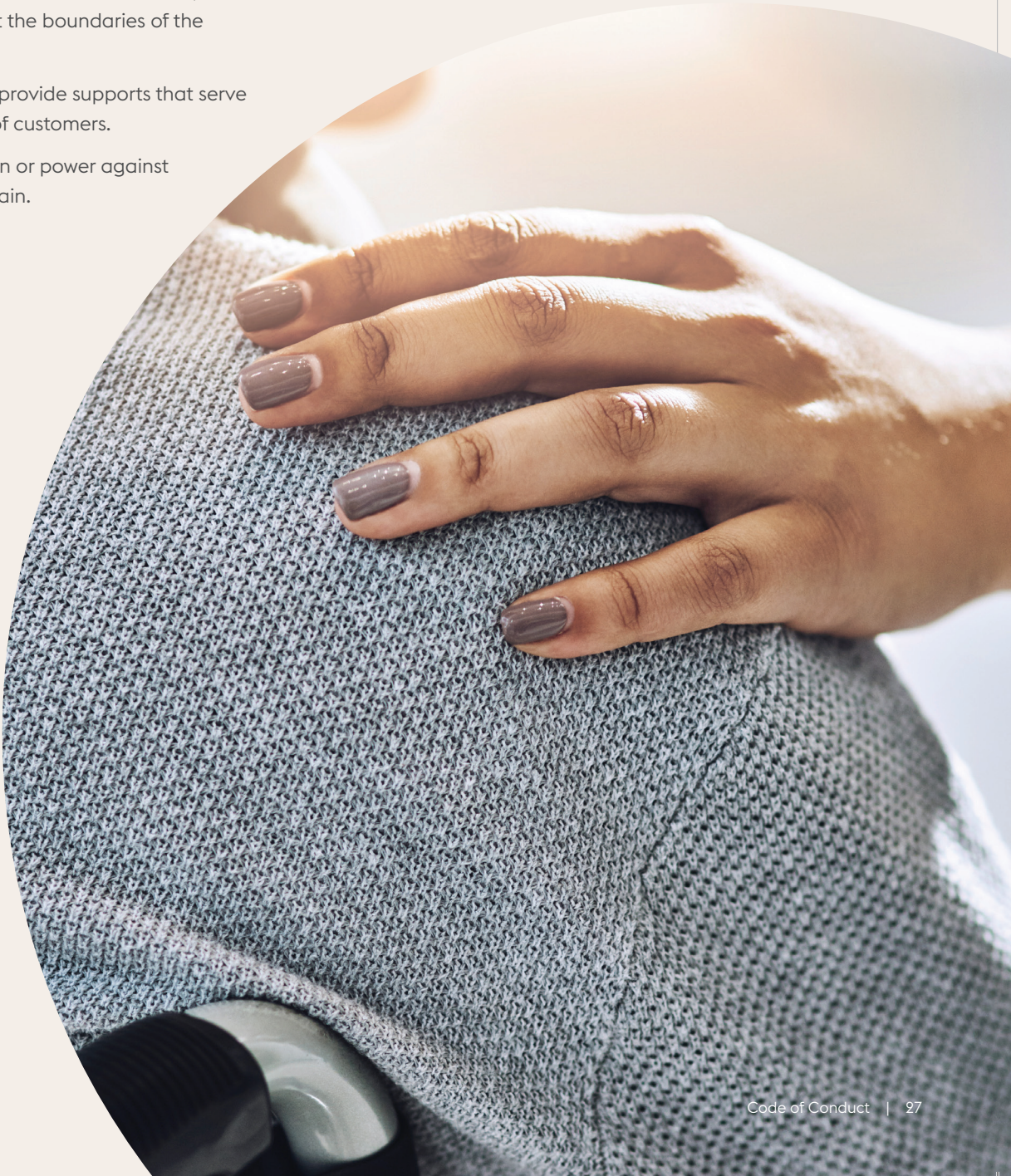
Acting with integrity means doing the right thing even if no one is watching.

Acting with honesty and transparency means being open and clear about what you are doing and being careful to avoid situations that could be seen as a conflict of interest.

By demonstrating these values in all aspects of your work, you can provide high-quality support, responsible services.

To meet this obligation, you must:

- Respect the privacy of customers and their families, carers and advocates.
- Display professionalism while providing support services.
- Communicate in a language, form, manner and tone that enables customers to understand the information provided and to make their preferences known.
- Maintain appropriate professional boundaries, and act at all times to protect the boundaries of the professional relationship.
- Always recommend and provide supports that serve the needs and interests of customers.
- Never abuse your position or power against customers for personal gain.





For More Information

Related internal or external documents and links

Company policies & procedures

This Code should be read in conjunction with all relevant company policies, which include (but are not limited to) the policies referenced in the Code. As policies and procedures may change from time to time, everyone representing Claro is responsible for making themselves familiar with any updates.

Professional codes of conduct

Physiotherapy Board of Australia's Code of Conduct:

<http://www.physiotherapyboard.gov.au/Codes-Guidelines/Code-of-conduct.aspx>

Podiatry Board of Australia's Code of Conduct:

<https://www.podiatryboard.gov.au/Policies-Codes-Guidelines/Code-of-conduct.aspx>

Dieticians Association of Australia

<https://daa.asn.au/wp-content/uploads/2017/01/2013-Code-of-Professional-Conduct-member-and-APD.pdf>

Speech Pathology Australia - National Code of Conduct

https://www.speechpathologyaustralia.org.au/SPAweb/Resources_for_Speech_Pathologists/Professional_Resources/HTML/National_Code_of_Conduct.aspx?WebsiteKey=fc2020cb-520d-405b-af30-fc7f70f848db

Nursing & Midwifery Board of Australia Code of Conduct

<https://www.nursingmidwiferyboard.gov.au/News/2017-09-28-new-codes-of-conduct.aspx>

The MBA Code of Conduct for Doctors in Australia

<https://www.medicalboard.gov.au/Codes-Guidelines-Policies/Code-of-conduct.aspx>

The NDIS Code of Conduct

<https://www.ndiscommission.gov.au/sites/default/files/documents/2019-05/code-conduct-workers-mar-2019-11.pdf>

Relevant Standards and Legislation

Employment and Workplace Health and Safety Laws

Fair Work Act 2009 (Cth)

Work Health and Safety Act 2011 (Cth)

Occupational Health and Safety Act 2004 (Vic)

Work Health and Safety Act 2011 (NSW)

Work Health and Safety Act 2011 (ACT)

Work Health and Safety Act 2011 (Qld)

Work Health and Safety Act 2012 (SA)

Occupational Health and Safety Act 1984 (WA)

Privacy Laws and Regulations

Privacy Act 1988 (Cth)

Health Records Act 2001 (Vic)

Privacy and Data Protection Act 2014 (Vic)

Health Records and Information Privacy Act 2002 (NSW)

Privacy and Personal Information Protection Act 1998 (NSW)

Information Privacy Act 2009 (Qld)

Personal Information and Protection Act 2004 (Tas)

Freedom of Information Act 1992 (WA)

Trade Practice and Ethical Business Laws and Regulations

Competition and Consumer Act 2010 (Cth)

Criminal Code Act 1995 (Cth)

Corporations Act 2001 (Cth)

Service Laws and Regulations

Aged Care Act 1995 (Cth)

National Disability Insurance Scheme Act 2013 (Cth)

The image features a dark teal background with a large, stylized sunburst or radial pattern. The pattern consists of numerous lines of varying lengths and thicknesses, all originating from a central dark teal circle. The lines radiate outwards towards the edges of the frame, creating a sense of energy and movement. The lines are a lighter shade of teal than the background.

Claro

www.claro.com.au