



Code of Conduct



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If you have any questions about the Code

Please contact your People and Culture Team by emailing:



people@claro.com.au



Message from the CEO

At Claro, our focus is on delivering exceptional person-centric care. The health and wellbeing of our clients, 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 Claro relies on the confidence our clients 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.

Each of us needs to be accountable for our actions, 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 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 clients, community, and each other.

Kind regards,

Cameron Hare | CEO



About the Code

What is the Code of Conduct?

As an organisation, Claro Aged Care and Disability Services is committed to not only complying with our legal obligations, but also acting ethically and responsibly in relation to our clients, colleagues and the community.

For us to achieve the highest standards in client 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.

It sets out our obligations in relation to:

- Our clients 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.

Who does the Code apply to?

The Code applies to everyone who is employed by, works with or represents Claro Aged Care and Disability Services, including:

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

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.

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.

Code administration and compliance with the law, policies and procedures

The People and Culture 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.

Providing quality care for people to live healthier, more independent, and happier lives



About the Code

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 regarding your duties, please speak to your manager.

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 clients 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.
- Promptly take steps to raise concerns about matter that may impact your safety both physically and psychologically.
- 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. A copy of the Claro Modern Slavery Statement is available through the online register for Modern Slavery Statements.

Our values, our brand

Our values represent the different way we achieve greatness together and champion ourselves as individuals. When we come together, we shine.



We **bring energy** to the day, going above and beyond wherever possible.



We **act with integrity** as individuals, and as a united team.



We **nurture and care** for all on our path, every interaction grounded in compassion.



We **listen and connect** with our peers and clients, constantly pushing the benchmark forward.





**Our clients and people are the reason
we come to work every day**

Our interactions

It's important to make every interaction that we have with each other and with our clients 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 and promoting a safety first culture, and following workplace health and safety procedures.
- Not using any personal electronic devices (mobile phones, tablets, etc.) during shifts unless it is for business purposes.
- Treating clients and each other with respect and according to our Shine values.
- Being sensitive to clients, peers and colleagues of all cultural differences and backgrounds.
- Taking responsibility for our own actions.
- Watching out for each other.

Everything we do should ensure our clients have confidence in our services and provide their loved ones with peace of mind.

If you have a client-facing or direct care role, you should:

- Always apply a client-centric focus to your work – treating clients with kindness, respect, empathy and compassion.
- Always greet and interact with clients in a positive manner.
- Work within care plans and work plans – if a client 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.
- Clearly displaying your name badge on shift (if relevant).
- Wearing the required, appropriate or prescribed personal protective equipment for your work (if relevant).
- Wearing footwear that is enclosed and fit for purpose.
- If you wear jewellery, ensure 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, ensure nails are kept short and clean.
- When uniform is not provided, please wear smart casual clothing that is appropriate to your position and role.

Behaviour and Presentation

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 support and interact with.



Information Systems, Assets and Resources

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

Claro's 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, Alayacare and 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's 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

Company assets and resources generally include all office equipment and supplies, intellectual property and branding, confidential information, 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 of Conduct also apply to the use of client 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, including 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 business 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, clients, 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.

Confidential information

In your work, you may receive or have access to confidential information about our company, its business, operations, clients 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.
- Intellectual Property.
- Price lists/cost sheets.
- Tender information including costings, margin analysis, scope analysis and related materials.
- Lists of clients.
- Client records (including medical records and other health information).
- 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, clients 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 the confidential information to other business units in the Zenitas Healthcare group, 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 Claro.

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: **claro.comms@claro.com.au** or your relevant General Manager.

You also should not use social media as a forum to discuss work-related matters or share work-related images, with the exception of internally utilised private collaboration platforms or in accordance with the social media policy. Communicating with clients via social media, unless it is part of a client'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, clients 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.





Ethical Business Conduct

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

Fraud, theft and 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's 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

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

Gifts of any value must be declined by everyone across Claro Aged Care and Disability Services. If you are unsure, please discuss any gift offers with your line manager.

You should only accept or provide entertainment (e.g. lunches, dinners, sporting events, arts and theatre) for clients 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 entertainment could create an obligation or expectation that could conflict or be perceived to conflict with your work at Claro, it should be refused.

Conflict of interest

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, business partners and clients.

Some examples of conflicts of interest include:

- Witnessing legal documents for a client.
- Accepting or giving loan, or giving or receiving a guarantee for a loan for a client.
- Selling goods and services to a client, including raffle tickets, party plan selling, and donations to fundraising events.
- Asking for or accepting monetary donations from a client.
- 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 actual, potential or perceived conflict, you should take reasonable steps to manage or remove the conflict to avoid detriment to our company or clients.

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, Corporations 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.

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. This 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 clients 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

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.

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.
- Where possible, obtain incontinence bins for incontinent clients.
- Be 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.

Equal employment opportunity

We recognise that our people play a significant role in our ability to be successful and sustainable, and we 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.

Whilst being mindful of the inherent requirements of a role, 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.

Workplace health and safety (WHS) at Claro

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 **Workplace Health and Safety (WHS) team** are responsible for regularly reviewing WHS 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.



Our Golden Rules

These safety rules define the minimum expected safety behaviours for all employees. Under these rules, you must:



Only do the
**tasks you
are trained
and able to do.**



**Drive
carefully**
and always obey
the road rules.



**Recognise
hazards or risks**



Make sure you and those around you are aware of any in your workplace, site or clients home.



**Follow our
hazardous**
manual handling
guidelines always.

Always follow our
**Code of
Conduct**



**Respect
others**



always and treat
them with dignity
so they feel safe.

**Safety
First**



If in doubt -
get out!

Only attend
work if you are
**fit, well and
able to do so**



**Report all
incidents**



immediately or by
the end of your shift.

This includes hazards and near-misses. Report to your leader or through the incident notification process.

Alcohol, drugs and 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.

Claro is a smoke free business and smoking, vaping or similar activities are not permitted in our company's premises and workplaces.

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.

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, 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.

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 clients, 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 client property.
- Forming inappropriate emotional, social or intimate relationships with clients.
- Inappropriately using social media, information systems and other company assets.
- Posting inappropriate, false or malicious comments or materials online regarding our company, employees, clients 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 provide Claro with a copy of your NDIS Worker Screening Check 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.
- Failing to maintain position related compliances and professional registrations.
- Choosing to work using unsafe tools or practices.

Our commitment

We're proud to be a diverse and inclusive workplace, where everyone feels valued and respected.

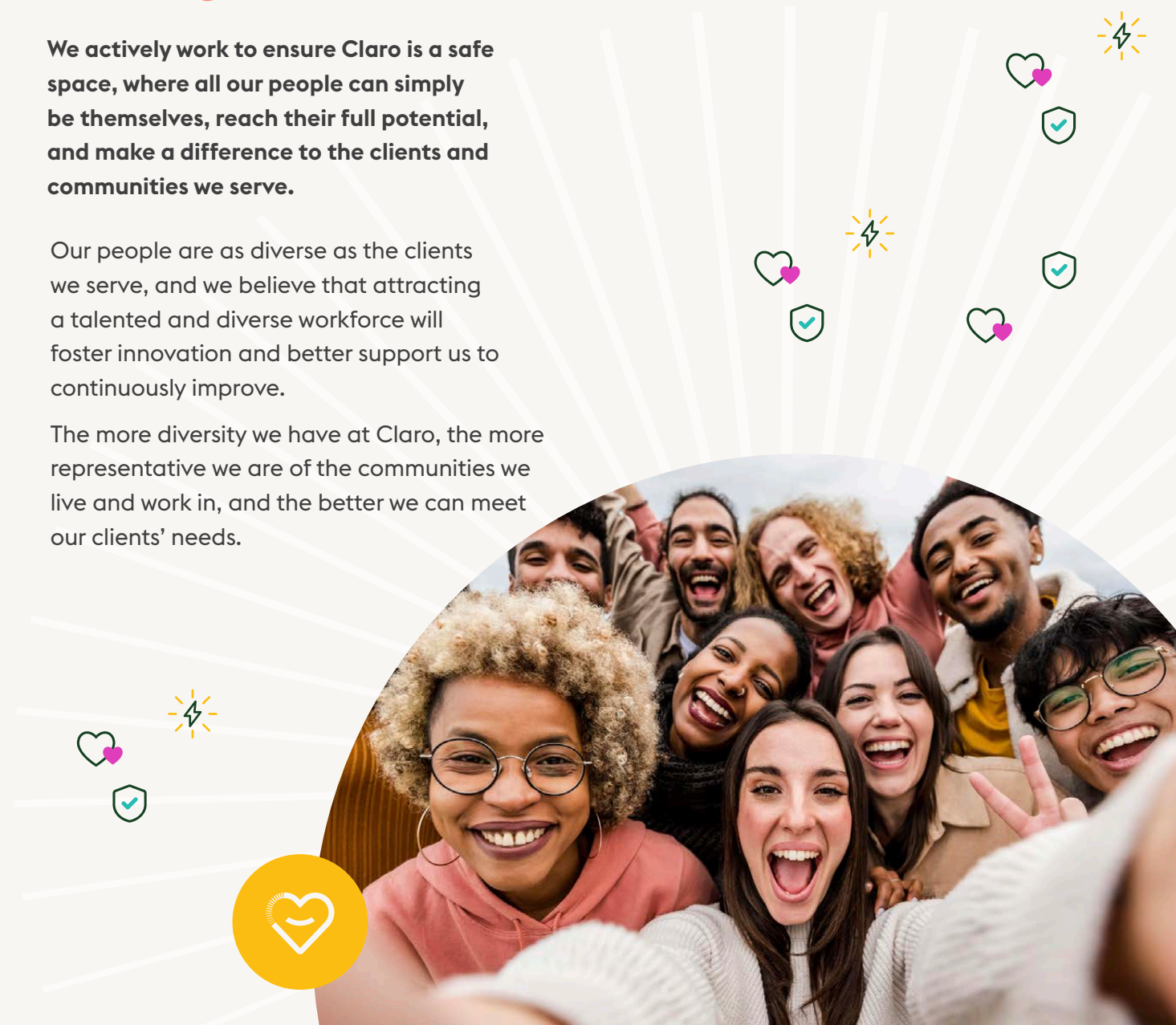


Embracing differences

We actively work to ensure Claro is a safe space, where all our people can simply be themselves, reach their full potential, and make a difference to the clients and communities we serve.

Our people are as diverse as the clients we serve, and we believe that attracting a talented and diverse workforce will foster innovation and better support us to continuously improve.

The more diversity we have at Claro, the more representative we are of the communities we live and work in, and the better we can meet our clients' needs.



Conflict Resolution

The Claro Speak Up Hotline is an externally managed whistle blower hotline. All reports are managed with the strictest confidence and in line with the Code.



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 with the workplace, you are encouraged to escalate the matter to your People and Culture contact for assistance, or reach out to **people@claro.com.au**.

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 Chief Executive Officer.

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.

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:

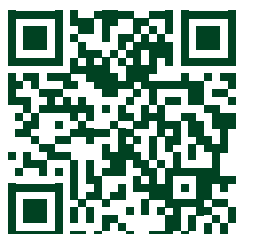
- Reprisals, harassment or victimisation.
- Demotion or dismissal or loss of opportunity for promotion.
- Current or future bias.

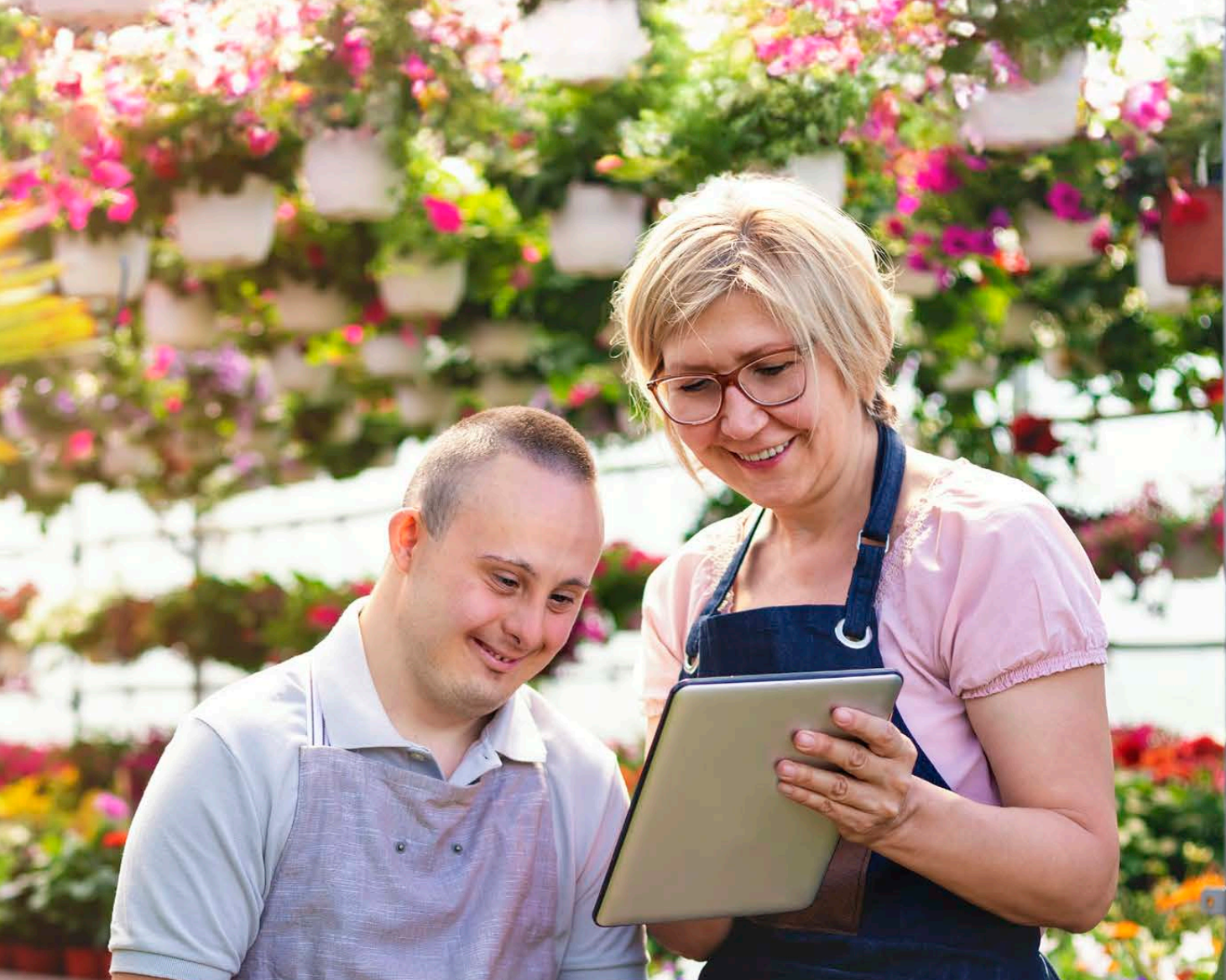
For further information, please see Claro's protected disclosure policy.

Everyone has a role to play

Speak^up

LEARN MORE OR
REPORT ONLINE





Professional Boundaries and Obligations of Care Workers

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, emotional, physical, sexual abuse and neglect. We stand for zero tolerance of abuse of both our employees and clients.



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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 client.
- You swap contact details with clients or interact using social media.
- You invite a client to a personal party or social event.
- You take a client to your home or that of your family or friends.
- You take friends or family members to the client's home.
- You accept an invitation from a client to a personal party or social event, other than during providing support for community access.
- You borrow items from clients.
- You use touch that is not essential to doing your job.
- You do additional tasks outside the care (service) plan or at the client's request.
- You discuss particular details or gossip about other support workers with clients.
- You discuss company business activities or decisions with clients.

Simple rules for keeping boundaries

- Do not seek out a personal relationship with your clients or their loved ones.
- Do not introduce clients to your own family or friends.
- Do not socialise with your clients 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 or vape or undertake similar activities with or in front of clients, and do not borrow, lend or supply cigarettes for your clients (unless specifically in the care plan).
- Do not smoke immediately before entering a client's home.
- Do not borrow, ask for or lend money to clients.
- Do not talk about your personal, financial or life problems with clients.
- Do not ask for or take money, gifts or special favours from your clients.
- Do not allow clients 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 clients with your family or friends. Talk to colleagues and use peer supervision.
- Do not disclose personal information (yours, colleagues' or other clients')
- Do not use your mobile telephone for non-work reasons whilst on shift.

Obligation O1

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

To meet this obligation, you must:

- Treat our clients with dignity and respect and uphold their human rights.
- Never abuse, exploit, harass or neglect a client.
- Always take action to ensure a client 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 clients (and their families, carers and advocates) to deliver support with their interests and needs in mind.
- Support clients to meaningfully engage with their local community and society.
- Exercise professional and ethical judgement when providing services.

Obligation O2

You must report any form of abuse or suspected abuse.

- Zero tolerance of abuse of clients 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 client 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, Aged Care Quality and Safety Commission (www.agedcarequality.gov.au), or use the **Speak Up hotline**. You will be able to make a secure online report 24/7. Alternatively you can call the confidential hotline on **1800 324 775** or email speakup@coreintegrity.com.au
- 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.

Obligation O3

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 client 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 O4

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 clients 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 clients ask you to use (which may differ from their given name or assigned gender).

Obligation O5

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.

To meet this obligation, you must:

- Respect the privacy of clients and their families, carers and advocates.
- Display professionalism while providing support services.
- Communicate in a language, form, manner and tone that enables clients 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 clients.
- Never abuse your position or power against clients for personal gain.



More information

Related internal or external documents and links



Company policies and 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

NDIS Code of Conduct



www.ndiscommission.gov.au/rules-and-standards/ndis-code-conduct

Code of Conduct for Aged Care



www.agedcarequality.gov.au/for-providers/code-conduct

AHPRA Code Of Conduct



www.ahpra.gov.au/Resources/Code-of-conduct/Shared-Code-of-conduct.aspx

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

- National Disability Insurance Scheme Act 2013 (Cth)

