

Advara HeartCare Code of Conduct Policy

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1. Introduction and Purpose

The Code of Conduct ('the Code') outlines the minimum standards of behaviour that are expected of each employee, contractor and consultant of Advara HeartCare, to ensure that we achieve our purpose of 'Improving Australia's Heart Health'.

2. Terms and Definitions

'Workplace participant' is any employee, contractor or consultant of an entity in the Advara HeartCare group.

Accordingly, a reference to "Advara HeartCare" is a reference to all of Advara HeartCare Pty Ltd, Advara SleepCare Pty Ltd and their subsidiaries, including the CardioNexus group.

3. Scope

This Code applies to all 'workplace participants'.

As representatives of Advara HeartCare, all workplace participants are expected to conduct themselves in a professional and courteous manner and observe the following standards of behaviour both inside the workplace and outside the workplace where the workplace participant can be perceived as representing Advara HeartCare and/or their local practice.

The Code does not form part of any workplace participant's contract of employment. Nor does it form part of any other workplace participant's contract for service.

This Code replaces all other Codes of Conduct whether written or not.

Advara HeartCare reserves the right to vary, replace or terminate this Code from time to time.

4. Responsibilities

Each individual is accountable and responsible for their actions. A workplace participant may be asked why they have chosen a particular course of action to demonstrate that a decision is reasonable in the circumstances and is fair and equitable.

One up managers are responsible for implementing this Code and associated local policies and procedures. Executive managers are accountable for the ongoing implementation, review and feedback of the Code.

Refer to the policy and/or procedure below for specific responsibilities in relation to the Code.

5. Policy

Achieving and exceeding the standards of behaviour set out in the Code will help build an organisational culture in which everyone feels respected and proud. High standards of workplace practice and conduct improve staff morale, which leads to more effective working relationships, enhanced patient outcomes and increased productivity.

The Code also provides an ethical framework to guide our decisions, actions and behaviour whenever and wherever relevant to our work and responsibilities. While the Code cannot provide an answer to every ethical challenge that workplace participants may face, the principles provided here will assist each person to better understand their obligations to act ethically and professionally.

Each workplace participant is responsible for understanding their obligations as contained in this Code of Conduct and for managing their actions accordingly.

Workplace participants are encouraged to seek guidance from a manager if they do not understand what this Code requires, or if they come across a situation where they are not sure how they ought to respond.

5.1. Our Purpose

'Our Purpose is to improve Australia's Heart Health'

It is our vision to give people with heart disease, as well as sleep and respiratory conditions, world class care as the standard of care. By providing individualised care, research and world-leading outcomes, we will reduce the impact of heart disease in Australia.

Everything we do is designed with the patient in mind - we work in parallel with our clinicians, our technicians, and our internal teams to ensure the best outcomes for our patients.

5.2. Our Values

Our values are the principles that guide our behaviour:

- **We Care:**
 - We have empathy for our patients and listen to understand.
 - We're considered in our actions and interactions with patients, peers and partners.
 - We approach all situations with support, compassion and kindness, and an understanding that no two people or their experiences are the same.
- **We Advance:**
 - We're committed to always advancing and improving our care.
 - We take initiative, remain curious and innovate to deliver world-class patient care.

- **We Work Together:**

- Advancing care can't be done alone. We need to do this together, in parallel with each other, our patients and our partners.
- We continuously collaborate and work with the skills of those around us.
- We're unified and motivate others to succeed because every little win is a win for us all.

- **We Deliver:**

- We follow through on what we say we'll do.
- We measure our outcomes to hold ourselves accountable for our actions and deliver world-leading patient outcomes.
- We're agile in our approach, which enables us to continually deliver for our patients, referrers, partners and each other.

5.3. *Breach of the Code*

Breaches of the Code may result in disciplinary action including, but not limited to the termination of employment. Refer to the Performance and Conduct Policy and Discipline Policy.

6. Procedure

6.1. *Acceptable behaviour and responsibilities*

'We are all responsible for behaving positively'

Workplace participants are to comply at all times with the behaviours outlined in this Code of Conduct. You are also to adhere to the following general principles:

- Always act in the best interest of Advara HeartCare
- Maintain and promote high levels of acceptable behaviour
- Help to build and maintain a culture that is just and fair to all

As a staff member of Advara HeartCare you are responsible for the way you behave and your actions. All your decisions must be ethical and comply with legislation, enterprise/collective agreements, Modern awards, policies, procedures, rules and job requirements. In your work at Advara HeartCare you must:

- Carry out your duties carefully, safely, honestly, courteously and fairly; practice in accordance with agreed standards of your profession delivering on Advara HeartCare's Vision and Values;
- Respect the dignity, culture, values and beliefs of all individuals;
- Use your authority and delegation/s in an appropriate and unbiased way for the intended work related purposes;
- Treat members of the public, patients and colleagues fairly, consistently and with respect;
- Be honest and accurate in timekeeping;
- Provide fair, accurate and appropriate advice;

- Consider in your decision making any adverse impacts on the environment;
- Promptly report unethical, dishonest and/or corrupt conduct;
- Maintain and develop the knowledge and skills necessary to carry out duties and responsibilities;
- Be honest at all times and do not knowingly make a false statement;
- Do not use bad language or fight in the workplace;
- Carry out all lawful directions from managers and supervisors to the best of your ability.

If you are a manager or supervisor, you have additional responsibilities. You must:

- Lead by example, promoting a team spirit and avoiding bias;
- Promote the highest standards of professional conduct;
- Ensure you do not permit or encourage any employee to act in breach of the Code;
- Ensure all workplace participants have access to all Advvara HeartCare information, including this Code, policies, procedures and rules, required to carry out their work diligently;
- Provide advice and assistance to employees wherever necessary;
- Be aware that you can be held accountable if you have been negligent in your supervisory role e.g., if you knew that a problem existed and did not take corrective action.

Managers and supervisors are, in many cases, accountable for what their staff do or fail to do.

If you are uncertain about what is required of you under this Code, you should immediately seek advice from your manager, supervisor or from your P&C Business Partner. Always ask for help if unsure.

6.2. Patient Care

'We are committed to providing world class patient care and world leading outcomes'

Our patients are the centre of everything we do.

Workplace participants will operate in this respect by:

- Ensuring timely access to appropriate information and quality treatment;
- Promptly advising patients of any delays or changes to their appointment;
- Professionally providing safe care;
- Always showing our patients respect, dignity and consideration;
- Maintaining confidentiality and respecting personal information; and
- Being open to any feedback, comments or suggestions of patients.

6.3. Commitment to Safety, Quality and Risk Minimisation

'We will always act in a safe manner'

To achieve our vision, we put safety first, and have a Work Health and Safety Management System (WHSMS) that guides us in meeting this requirement.

Each Advara HeartCare employee and contractor has a part to play in making sure that:

- our customers enjoy safe, clean and reliable patient services
- our work environment is safe and free from hazards
- we work safely and don't endanger our colleagues

We share the four Universal Safety Responsibilities that define Advara HeartCare's expectations of us to:

- avoid taking unjustifiable risks
- avoid causing harm
- follow the Occupational Health and Safety Management System
- always work safely

6.4. *Comments and Feedback*

'We welcome positive and negative feedback, and we are accountable for our actions'

Advara HeartCare welcomes both positive and constructive comment from workplace participants, patients, their carers, family members and the wider community as it strives to continuously improve the care delivered throughout all Advara HeartCare practices.

Positive and constructive comments regarding the services provided by Advara HeartCare may be received verbally or documented.

Feedback provides Advara HeartCare with an opportunity to improve practices to ensure we are achieving our vision and to be recognised as an 'employer of choice'. Staff meetings, performance appraisals, exit interviews and an 'open door' management strategy allow all employees to have a voice.

6.5. *Smoke free workplace*

'We will maintain a smoke free workplace'

Smoking is not permitted in any Advara HeartCare workplace. Examples of 'workplace' include:

- Advara HeartCare premises
- Advara HeartCare vehicles
- building entrances and lobbies, stairwells, elevators, toilets, meal rooms, lounge areas, training rooms, conference rooms and meeting rooms
- any area in the vicinity of other employees or patients

Counselling for personal or other issues (including quitting smoking) is provided through the Advara HeartCare Employee Assistance Programme available 24 hours per day by phone 1800 808 374.

6.6. *Appropriate use of alcohol and/or drugs*

'We will not let alcohol or drugs affect the way we work'

You are responsible for ensuring your capacity to perform your duties is not impaired by the use of alcohol or drugs, and that the use of such substances does not put at risk you or any other person's health and safety.

*It is an **individual's** responsibility to ensure that their performance at work is not negatively affected by drugs or alcohol.*

Inform your manager or P&C Business Partner if you are concerned that health and safety in the workplace may be adversely affected by a worker whose performance you suspect may be affected by drugs and / or alcohol.

The obligation to ensure your capacity is not impaired by the use of alcohol and/or drugs extend to all functions and places that are work-related. A "work-related function" is any function that is connected to work. For example, conferences, work lunches or meetings, Christmas parties, client functions etc.

Alcohol

If alcohol is being consumed at a work-related function:

- Workplace participants who consume alcohol must do so in a responsible manner.
- Workplace participants must not become inebriated or drunk.
- Workplace participants must uphold an appropriate standard of behaviour at all times and inebriation will not be accepted as an 'excuse' for misconduct.
- Workplace participants must not drive any vehicle if they have consumed any alcohol or drug (being any drug that could impair the ability to safely operate the vehicle). Workplace participants who do not have a safe means of transport should advise their supervisor or manager in order to arrange transport.

Drugs

It is against the Code of Conduct to possess, consume, be under the influence or have any other involvement with illegal drugs while at work.

Where a workplace participant is taking prescription or pharmacy medications for a legitimate medical purpose, the workplace participant will not breach this Code of Conduct by attending work, if:

- the workplace participant takes the prescription and pharmacy medications in accordance with the instructions of their medical practitioner and normal directions applying to the use of those drugs,
- the workplace participant does not misuse or abuse prescription or pharmacy medications,
- the workplace participant is aware of the effects (including potential effects) of consumption of alcohol while taking prescription and pharmacy medications, and

- the workplace participant checks with their medical practitioner or pharmacist about the effect of the drug on their ability to drive vehicles, operate machinery or equipment and generally perform their work duties in a safe manner.

If a workplace participant's ability to perform his/her work safely could be impaired by prescription or pharmacy medications, the workplace participant must inform their manager PRIOR to starting work and must obtain advice in writing from the medical practitioner or pharmacist as to what the specific restrictions are.

6.7. Discrimination, harassment, and bullying-free workplace

'We value equity and diversity in the workplace'

Advara HeartCare is committed to providing a work environment that is free from harassment, discrimination, victimisation and bullying.

You must not discriminate, victimise, intimidate, bully or harass other workplace participants, patients or members of the wider community for any reason.

Managers must ensure the workplace is free from all forms of victimisation, harassment, discrimination, and bullying. They should understand and apply the principles of equal employment opportunity and ensure the workplace participants they supervise are informed of these principles. Managers should take all necessary steps, such as training and other active measures, to prevent and deal with harassment, discrimination, victimisation and bullying in their work area.

Advara HeartCare is also an equal employment opportunity employer and as such promotes diversity across the organisation and practices.

Further information/advice on:

- Bullying, Harassment and Discrimination refer to Bullying, Harassment, Discrimination and EEO Policy
- Resolving grievances: refer to the Grievance Resolution Policy
- Strategies to eliminate discrimination, harassment and bullying before a problem arises – refer to your manager or Senior HR Business Partner

6.8. Fairness and equity

'We are committed to a fair and open workplace'

Any information or advice you give, or any decisions you make, should be dealt with consistently, promptly and fairly. This involves dealing with matters in accordance with Advara HeartCare policies, in a non-discriminatory manner, and in conformity with procedural fairness. You may be asked why you have chosen a particular course of action and to demonstrate that a decision you have made is reasonable in the circumstances, and is fair and equitable.

When making a decision, you should ensure that you:

- Take all relevant facts into consideration and make decisions based on facts
- Assess the particular merits of each case, and not take irrelevant matters or circumstances into consideration.

Procedural fairness must be applied at Advara HeartCare. This requires that people who are significantly affected by a decision have the right to put forward their case. Further, the subsequent decision must be made in a fair and impartial manner. You also have the right to a support person.

All complaints must receive fair and equitable treatment and be managed in a timely, unbiased, sensitive and confidential manner.

6.9. *Appropriate use of resources*

'We will use facilities and resources efficiently and economically'

Use of Advara HeartCare funds and Corporate Credit Cards

Corporate Credit cards are an efficient procurement method for low value and low risk purchases, and must be used in line with the Corporate Credit Card Policy.

Any items purchased with Advara HeartCare funds, regardless of the method, must be intended and used for Advara HeartCare purposes only.

Limited private use

You may use some Advara HeartCare facilities (for example, telephones, photocopiers or computers) for limited private use. Private use must not provide financial benefit to you or another person and must be minor, at minimal or no cost to Advara HeartCare and represent no risk.

Private use of resources for purposes unrelated to Advara HeartCare's business is prohibited if it is illegal, unethical, anti-social, used to gain personal profit or interferes with you carrying out your job.

Workplace participants must read and agree to apply the Computer, Internet, Email and Mobile Policy before using Advara HeartCare computer or communications equipment.

You must care for Advara HeartCare equipment, uniforms or protective clothing issued to you.

6.10. *Acting with integrity*

'We will act with integrity in all we do'

The integrity of Advara HeartCare is of vital importance. In dealings with other employees, organisations, clients or suppliers we must always act with the highest levels of professionalism and integrity.

6.11. *Notification of charge/conviction of a criminal offence*

'We have a responsibility to consider all potential risks to our employees and patients'

You must immediately notify your Manager **and** P&C Business Partner if you are charged with or convicted of:

- a criminal offence that could be deemed to have an effect on or relates to your employment,
- a serious criminal offence (an offence punishable by imprisonment for 6 months or longer), or
- any offence which prevents you from performing your full range of duties safely.

This information will be treated with confidentiality and only discussed with the relevant parties to ensure that the organisation, your co-workers and you are not at any further risk.

Advara HeartCare may take disciplinary action if:

- it is found that a workplace participant has not declared a criminal charge or conviction as outlined above; or
- a workplace participant is convicted of a criminal offence that may pose a risk to our employees or patients.

6.12. *Advara HeartCare Information and Intellectual Property*

'We will maintain high levels of confidentiality'

You must only ever use confidential information you have access to through work for its intended purpose when performing your role, and even then, on a 'need-to-know' basis to colleagues or authorised recipients. You must also protect this information.

The types of information that must be treated as confidential include financial, technical and strategic business information and commercial arrangements, about Advara HeartCare or other parties (such as suppliers). It also includes personal information of patients and others. This information can be in many sources / forms including patient records. If you are unsure, please ask your Manager.

You must:

- Take care when collecting, storing, using and disclosing personal information in order to protect individuals' privacy
- Safeguard your PC password
- Take care to keep Advara HeartCare information secure and confidential if it is identified as being confidential
- Use Advara HeartCare record systems and procedures to create and store Advara HeartCare records and information
- Handle records with care

- Comply with other policies relevant to the use, storage and disclosure of information including the Privacy Policy and the Data Storage and Transmission Policy.

You must not:

- Use or disclose personal information for a purpose other than that for which it was collected, unless consent for other uses or disclosure is obtained from the person to whom the information relates
- Use confidential Advava HeartCare information for your own purposes
- Reveal, trade or sell confidential information to other people
- Use Advava HeartCare information for personal gain or to cause harm to any person, organisation or to Advava HeartCare
- Use Advava HeartCare information to help you or others gain a financial benefit such as speculating in shares or property.

Advava HeartCare owns intellectual property developed, invented or created by you alone or in working with others, in the course of your employment or engagement with Advava HeartCare.

6.13. *Conflict of interest*

'We always act in the best interests of Advava HeartCare'

All workplace participants have a duty to always put the interest of Advava HeartCare above their own personal or private interests when carrying out their official duties.

A conflict of interest exists where a personal interest, aim, goal, personal business interest or desired outcome influences, or could be perceived to influence, the way you carry out your duties as an Advava HeartCare workplace participant. Potential conflicts of interest must be dealt with - if not appropriately acted upon a potential conflict of interest becomes improper conduct.

This is further outlined in the Conflict of Interest Policy, noting examples of conflicts of interest may include:

- having/setting up a business or business interest that supplies or wishes to supply to Advava HeartCare
- having a family member, friend or acquaintance who is involved financially or otherwise in a Advava HeartCare matter in which you have involvement as a result of your position at Advava HeartCare
- taking part in the selection and appointment of a supplier or contractor who is a relative or close friend
- beliefs or attitudes that influence the advice you give
- being part of the recruitment process when you have a personal relationship with an applicant (e.g. the applicant is a relative)

You may often be the only person aware of the potential for conflict of interest. Remember to always act in the best interests of Advava HeartCare, and in compliance with the Conflict of

Interest Policy. You must notify your Manager and P&C Business Partner immediately in writing if a private interest conflicts, could influence or may appear to conflict, with your Advava HeartCare responsibilities.

6.14. *Secondary employment and voluntary work*

'My work at Advava HeartCare is my first priority'

Secondary employment means work other than your job with Advava HeartCare and includes operating a private business and voluntary work. All of these may interfere with your ability to perform your Advava HeartCare duties.

Employees must not engage in secondary employment where:

- it may cause a conflict of interest with your Advava HeartCare duties
- it may cause a conflict of interest with Advava HeartCare working hours
- the work is with a competitor of Advava HeartCare
- it may interfere with or adversely affect your employment with Advava HeartCare, e.g. working excess hours can lead to fatigue and result in workplace safety incidents
- it involves the use of Advava HeartCare's intellectual property, information or Advava HeartCare resources
- it involves claiming that you speak or act on behalf of Advava HeartCare

6.15. *Public comment & Social Media*

'We will only speak on behalf of Advava HeartCare when authorised'

All enquiries from the media (including newspapers, radio, television, electronic or print media) about Advava HeartCare must be forwarded to both the Communication Manager and the General Counsel of Advava HeartCare.

Unless authorised by Advava HeartCare to do so, you must not make any comment on behalf of Advava HeartCare, claim to represent Advava HeartCare, or give any impression whatsoever (such as wearing an Advava HeartCare uniform or signing correspondence off with your Advava HeartCare title) that you are representing Advava HeartCare on any issue.

This does not prevent you making comment in such forums, as long as you do not represent yourself as an Advava HeartCare employee, contractor, consultant or representative speaking on Advava HeartCare's behalf. Refer to the Social Media Policy for more information.

As a general rule, you must not disclose information that is particular to Advava HeartCare, unless it is through a recognised process such as:

- If required by law
- to authorised persons in the course of your duties
- if called to give evidence in court
- if proper authority has been given for the disclosure.

If you are required to make any comments on Advvara HeartCare's behalf, provide only factual information and do not express an opinion on official policy or practice.

6.16. *Corrupt conduct, maladministration or serious and substantial waste*

'We will act in the best interests of Advvara HeartCare'

Advvara HeartCare will not tolerate any behaviour that is corrupt, involves maladministration, or serious or substantial waste.

Corrupt conduct is illegal and may have serious consequences such as dismissal and/or imprisonment. Corrupt conduct includes bribery, blackmail, fraud, the abusive or fraudulent use of official material or information, the dishonest use of a position of employment, or interference with the honest performance of another employee's duty.

Maladministration is a failure to comply with proper procedures or the law and may involve action or inaction and inefficient, bad or improper administration. Examples of maladministration would include failing to act on complaints about illegal activities, failing to comply with tendering processes or misusing confidentiality provisions.

Serious waste refers to uneconomic or ineffective use of Advvara HeartCare's resources, whether authorised or not, that leads to significant resources or money being wasted. Examples of serious waste include:

- Purchasing expensive materials and equipment that are never or rarely used
- Spending extensively beyond the budget or delegation
- Misuse of Advvara HeartCare equipment resulting in unnecessary maintenance costs.

6.17. *Obligation after leaving Advvara HeartCare*

'We have obligations if we leave Advvara HeartCare'

If you leave Advvara HeartCare you must maintain the confidentiality of information gained in your Advvara HeartCare capacity.

Prior to leaving you must return all Advvara HeartCare equipment, property and documentation provided or obtained as part of your work. This includes instruction manuals, uniforms, identification passes, corporate or procurement cards, keys, cab charge dockets, mobile phones, other communication devices, personal protective equipment and computer software and hardware.

6.18. *Reporting breaches of the code*

'Everybody has the right – and responsibility – to report inappropriate behaviour'

All employees must report suspected or known breaches of the Code of Conduct or other Advvara HeartCare policies. The appropriate person to report the breach to may vary according to the situation, however options may include:

- Your direct manager
- Another manager in the organisation that you trust
- Any member of the People & Culture team
- General Counsel or any member of the legal team

Advvara HeartCare will support anyone who reports wrongdoing.

It is in breach of the Code of Conduct for any person to punish or treat you differently for reporting any breach of this Code or other policies and procedures. If you believe that you have been treated differently after reporting an issue you should report this to your Senior HR Business Partner.

Also refer to the Whistleblower and Reporting Policy for more information on reporting dishonest, fraudulent or corrupt conduct.

6.19. *Dealing with breaches of the Code* *'Everybody is accountable for their actions'*

Advvara HeartCare will investigate any alleged breach of the Code. This action will be fair and objective. Outcomes of an investigation may include:

- Warning
- Suspension/Dismissal
- Proceedings under legislation, for example referring the matter to the police for potential criminal investigation.

If a workplace participant acts in bad faith or acts maliciously, criminally or otherwise, in addition to other disciplinary action Advvara HeartCare may seek to recover from the workplace participant the cost of any damages.

6.20. *Industrial activities*

Nothing in this Code of Conduct affects an employee's right to participate in lawful industrial activities.

6.21. *Applicable laws*

The Advvara HeartCare Code of Conduct does not stand alone. It is subject to and should be read in conjunction with applicable laws.

6.22. *Relevant Advvara HeartCare policies and procedures*

Current versions of all Advvara HeartCare policies and procedures can be located on the intranet and should be read in conjunction with this Code of Conduct.

6.23. *Relevant Professional Codes of Conduct*

All health professionals must also abide by their relevant professional bodies' code of conduct, policies, reporting requirements, patient conduct and similar, as outlined by the Australian Health Practitioner Regulation Agency (AHPRA) – refer www.ahpra.com.au.

6.24. Assistance

This Code is intended to provide you with practical assistance when faced with ethical challenges. No employee should ever be in a position of facing such ethical dilemmas without help. Assistance is available from within Advara HeartCare or agencies outside of Advara HeartCare.

Within Advara HeartCare, assistance is available from:

- Your immediate manager or supervisor of your work area
- Your P&C Business Partner
- Advara HeartCare's Employee Assistance Program

7. Evaluation

This Code will be evaluated by exception by monitoring the number and detail of related complaints, grievances and reported breaches.

8. References

- Fair Work Act 2009
- Commonwealth Racial Discrimination Act 1975
- Commonwealth Gender Equality Act 2012
- Human Rights and Equal Opportunity Commission Act 1986
- Privacy Act 1988
- National Safety and Quality Health Service Standards
- Australian Commission on Safety and Quality in Health Care

9. Appendices

Nil

Revision History

Version	Date Created	Created By	Description of change
1.0	February 2023	Head of People & Culture	Initial version