

## POLICY C11.1

### WORKER CODE OF CONDUCT

#### 1.0 INTRODUCTION

##### 1.1 Context

Scentia Holdings Pty Ltd and its subsidiaries, the Australasian College of Health and Wellness Pty Ltd (ACHW), the Australian Institute of Management Education and Training Pty Ltd (AIM) operating as AIM Business School (ABS), and AIM VET, a Registered Training Organisation (RTO), (collectively ‘the Scentia Group’) require all staff members to conduct themselves according to the highest standards of ethics, integrity, and behaviour when dealing with our clients, colleagues, and other stakeholders. This includes, but is not necessarily limited to, full compliance with all legal obligations imposed by statute or any other source of law.

##### 1.2 Purpose

The Worker Code of Conduct (‘The Code’) details the legal and ethical obligations and expectations of all staff to act in accordance with the expressed standards of conduct, integrity and accountability contained in relevant legislation, Scentia policies and Agreements.

The Code establishes the standards of behaviour that must be met by all workers, and outlines what is considered to be inappropriate behaviour and its consequences.

The Code should be read in conjunction with Scentia Groups’ policies and procedures.

##### 1.3 Scope

This Staff Code of Conduct applies to:

- all non-academic and academic Workers of Scentia Group whether full-time or fractional, continuing, fixed-term, contractor or casual;
- members of Scentia, AIM and ACHW Boards;
- volunteers who contribute to Scentia’s activities or who act on behalf of Scentia.

In addition, individuals who are engaged in providing services to Scentia or its subsidiaries, such as contractors, consultants, and Third-Party Providers, are also expected to comply with applicable provisions of the Code.

In some circumstances, this Code may apply to staff conduct outside of work. For example, it applies:

- when staff are on Scentia premises outside normal hours of work;
- whenever staff wear a Scentia Group uniform, or can otherwise be identified as a Scentia, AIM, ABS or ACHW staff member; and
- when staff attend a meeting, conference, training session or work-related social function representing Scentia Group.

## 1.4 Scope Exceptions

This Policy does not apply to Students. Students are referred to the Student Code of Conduct Policy and the Managing Inappropriate Student Behaviour Procedure. Student complaints are managed within the Student Grievances and Complaints Policy.

## 2.0 RESPONSIBILITIES

1. Workers, volunteers, and board members are required to be familiar with and comply with the terms of this policy at all times.
2. Head of People and Culture will ensure that this policy is provided to new workers during induction.

## 3.0 POLICY

This Code is a set of overarching principles to be followed. Workers should be familiar with the substance and spirit of the Code and should be aware that breaches may result in sanctions which may include counselling, disciplinary action, performance review, or civil or criminal action, depending on the nature of the breach.

The Code cannot address every situation that may be encountered. Therefore, if faced with a difficulty, individuals should ask for guidance and support from a senior staff member or refer to one of the resources listed at the end of this document.

### 3.1 Principles

All Workers, volunteers, and board members of the Scentia Group:

1. Have the right to feel and be safe, and to be able to conduct their individual roles in relation to teaching, research, administration, or any other activity without unnecessary disruption.

2. Treat others with respect and value differences and opinions by:
  - a. Refraining from any discriminatory, bullying or harassing behaviour toward customers, clients, co-workers, Scentia management and the general public;
  - b. Ensuring no discrimination on the basis of personal characteristics including (but not limited to) sex, race, disability, pregnancy, age, marital status or sexual preference;
  - c. Abiding by the Freedom on Intellectual Inquiry and Expression Policy.
3. Act in the best interest of Scentia and value Scentia's reputation in the performance of duties by:
  - a. Being faithful and diligent, and actively pursuing Scentia Group's best interests at all times;
  - b. Not making any statements to the media about Scentia Group's business. Requests for media statements should be referred to the CEO and Chief Marketing Officer;
  - c. Not engaging in conduct, whether during or after work hours, that in the opinion of the company causes damage or potential damage to Scentia's property or reputation;
  - d. Reporting any conduct of other Workers which is in breach of any of the Code, or potentially in breach of any of the Code, without delay.
4. Act with honesty and integrity, transparency and openness by:
  - a. Being honest and fair in dealings with customers, clients, co-workers, Scentia management and the general public, and treating them with courtesy and respect;
  - b. Being responsive and prompt in dealing with other Workers, students and the general community;
  - c. Creating a fair and just work environment when supervising staff members;
  - d. Observing procedural fairness when engaged in decision-making;
  - e. Not, in connection with the Worker's employment, accept any financial or other benefit from any entity other than Scentia - unless acceptance of such benefit is in accordance with the other workplace policies or is otherwise disclosed to and expressly permitted by Scentia.
5. Respect privacy and maintain confidentiality by:
  - a. Respecting the privacy of others in the collection, use and access of personal information whilst performing duties or activities;
  - b. Maintaining both during employment and after termination of employment with Scentia Group, the confidentiality of any personal

and/or confidential information, records or other materials acquired during the course of employment.

6. Comply with relevant laws and their obligations, relevant employment contracts/agreements and Scentia Group policies and procedures by:
  - a. Being familiar with all Scentia Group workplace policies, procedures, rules, regulations and contracts;
  - b. Complying with all reasonable and lawful instructions given by or on behalf of Scentia Group;
  - c. Respecting an employee's 'right to disconnect' under Australian employment awards, as defined by the Fair Work Act 2009.
  - d. Working in a safe and compliant manner, and observing all workplace health and safety rules and responsibilities;
  - e. Not utilising Scentia Group internet to access explicit material;
  - f. Not engaging in any employment or providing other services to any person or entity outside of Scentia Group that could result in a conflict of interest. If the staff member is unsure, then they are responsible to discuss such with their manager.
7. Workers, volunteers, and board members who fail to comply with this policy will be dealt with under the Discipline and Termination Policy.
8. Individuals other than staff members such as contractors, consultants, and Third-Party Providers who do not comply with this Code may have their association with Scentia Group terminated, or have their right, or access to Scentia services, facilities or infrastructure revoked.

### **3.2 Breaches of the Code of Conduct**

Where a Worker, board member, student or volunteer suspects a breach of the Code may have occurred they may seek advice from their manager, Student Services or Head of People and Culture. Individuals with concerns are encouraged to come forward in the knowledge that Scentia will:

- consider and investigate, if appropriate, allegations of behaviour that may breach the Code or other Scentia Group policies;
- take all reasonable steps to provide protection for individuals who make disclosures in good faith regarding conduct that is inconsistent with this Code; and
- follow the appropriate procedures depending on the issues/concerns raised.

## 4.0 DEFINITIONS

- **Confidential Information** - refers to any information or document that Scentia wishes not to make public. It can include anything that has been acquired by or made available to an individual or other legal entity in the course of the relationship between the parties.
- **Workers** - employees, contractors, agency staff, labour hire staff, people on work experience, sub-contractors, volunteers, trainees and outworkers.

## 5.0 REFERENCES AND ASSOCIATED INFORMATION

- Anti-Discrimination Act (2011)
- Age Discrimination Act (2004)
- Australian Human Rights Commission Act (1986)
- Disability Discrimination Act (1992)
- Racial Discrimination Act (1975)
- Sex Discrimination Act (1984 )
- Fair Work Act (2009)
- Freedom on Intellectual Inquiry and Expression Policy
- Health, Safety and First Aid in the Workplace Policy
- Conflict of Interest Policy
- Discipline and Termination Policy

*Note: This policy does not have a procedure.*

## 6.0 POLICY OWNERSHIP

Policy Owner	Head of People and Culture
Status	Reviewed on July 2024
Approval Authority	Scentia Corporate Board, with endorsement by ACHW, AIM Corporate Boards
Date of Approval	27 August 2024
Effective Date	6 September 2024
Implementation Owner	Head of People and Culture
Maintenance Owner	Head of People and Culture
Review Due	September 2027
Content Enquiries	Liz Douglas - Head of People and Culture Email: <a href="mailto:ldouglas@scentia.com.au">ldouglas@scentia.com.au</a>

## 7.0 AMENDMENTS

Version	Amendment Approval (Date)	Amendment Made By (Position)	Amendment Details
C11.0	21 October 2021	Head of People and Culture	<p>Title changed to specify that it applies to Staff only.</p> <p>New template.</p> <p>Responsibilities defined.</p> <p>Scope expanded to include volunteers, contractors and TPPs and activities outside office hours.</p> <p>Principles grouped by concept.</p> <p>Breaches of policy section added.</p> <p>Definitions, References and Policy ownership updated.</p>
C11.1	23 July 2024	Head of People and Culture	Minor edits to improve clarity