

HBF CODE OF CONDUCT

Introduction

HBF's Code of Conduct (**Code**) sets out the standards of behaviour, actions and decisions we expect of employees, officers, councillors, directors and contractors.

The Code sets out HBF's expectations for how HBF Personnel will conduct themselves in relation to their engagement with HBF.

The Code applies to all HBF Personnel – no one is exempt - and it is the personal responsibility of everyone covered by the Code to understand it and abide by it continuously.

Importantly, you are responsible and accountable for understanding and complying with this Code and your compliance with this Code is mandatory.

Please ensure you have read this document thoroughly and familiarise yourself with it.

This Code is publicly available on our website and intranet.

Definitions

"HBF," "we", "us" or "our" means HBF Health Limited ABN 11 126 884 786.

"HBF Personnel" or "you" means:

- every employee, officer, councillor and director of HBF; and
- every contractor of HBF (including subcontractors) performing activities for or on behalf of HBF but only to the extent required by their contract with HBF.

Who does this Code apply to?

This policy applies to all HBF Personnel.

HBF views all HBF Personnel to whom this Code applies as ambassadors of the business and expects that those individuals represent and promote HBF in a positive and professional manner.

If you are uncertain about the application of any aspect of this Code or if you have any questions in relation to it, you should speak with:

- your People Leader, Human Resources or the Compliance team if you are an employee;
- the Board chair if you are a councillor, officer or director; or
- your contract manager if you are a contractor.

When the Code applies

This Code applies:

- at all times when you are performing work for or on behalf of HBF;
- at any time when your conduct could affect HBF's reputation;
- at any time when your conduct could affect your relationship with HBF; and
- at any time when your conduct could affect your working relationship with the people you deal with at HBF.

Our Principles

HBF seeks to maintain the highest ethical standards and professional conduct in both our internal interactions with each other and when representing the organisation to our members and the wider community.

We are driven by our vision, purpose and values.

Our Vision is what we want to be:

"Australia's most trusted and valued member-based organisation."

Our Purpose is why we exist as a business:

"To deliver for our members in moments that matter."

Our Values are how we behave:

"Members Are Our Reason, We Are Brave, We Do The Right Thing, We Work as One."

In pursuing our vision, purpose and values, we need HBF Personnel to behave and act in a manner that is consistent with our key group policies. As such, and at all times, we expect all HBF Personnel to act consistently with the following HBF **Principles** which are based on those key group policies. Those **Principles** are to:

- act in a way that upholds the Principles, integrity and reputation of HBF;
- act with honesty, integrity and fairness and be accountable for all actions and decisions;
- comply with all privacy obligations and maintain confidentiality;
- comply with all laws and regulations;
- comply with all HBF policies, procedures and standards including HBF's key group policies;

- avoid conflicts of interest including actual, potential or perceived conflicts of interest;
- comply with our requirements in relation to external communications and official information;
- use HBF technology, assets and social media responsibly;
- treat others with respect and courtesy, and without bullying, harassment or unlawful discrimination; and
- put health, safety and wellbeing first.

BEHAVIOURS

Each HBF Principle is supported by Behaviours. These Behaviours, which are set below, are examples of how HBF Personnel can demonstrate compliance with HBF's Principles.

Act in a way that upholds the Principles, integrity and reputation of HBF

HBF Personnel act in a way that upholds the Principles, integrity and reputation of HBF when they:

- comply with this Code;
- comply with HBF's governance and risk practices, policies and procedures;
- act consistently with HBF's interests to the extent that it is appropriate to their relationship with HBF;
- ensure their actions do not compromise HBF's name, reputation, legitimate interests and business objectives;
- ensure their work attire conveys a professional image while representing HBF;
- ensure that only authorised personnel communicate with the media, regulators and members about matters relating to HBF;
- ensure business relationships are maintained in a manner consistent with the principles and philosophies contained within this Code; and
- report any contravention of this Code.

Act with honesty, integrity and fairness and be accountable for actions and decisions

HBF Personnel act with honesty, integrity and fairness when they:

- deal fairly and honestly with HBF, all HBF Personnel and members;

- perform their duties with integrity, care and diligence;
- make business decisions in a fair, impartial and prompt manner, considering all available information and applicable compliance obligations;
- are accountable for their decisions and actions;
- ensure that all information that they provide to HBF is true and correct;
- disclose all information that may impact on their relationship with or capacity to perform their duties for HBF, including but not limited to any criminal charge or conviction;
- do not engage in fraud, corruption or questionable accounting, management or auditing practices;
- are honest about their skills, credentials and capability;
- act within their delegated authority;
- have undertaken all training and learning, competency and accreditations required to undertake their role; and
- ensure that their use of HBF's resources is appropriate and reasonable.

Comply with all privacy obligations and maintain confidentiality

HBF Personnel meet their obligations when they:

- comply with all privacy obligations including the obligations in HBF's key group policies;
- comply with all confidentiality requirements;
- respect the privacy of members and other parties they deal with;
- keep personal and confidential information secure and protected from unauthorised use and disclosure; and
- do not use or disseminate confidential information inappropriately or for personal gain.

Comply with all laws, regulations and HBF policies

HBF Personnel comply with all laws, regulations and HBF policies when they:

- perform their duties in accordance with all applicable laws and regulations;

- follow any lawful and reasonable direction given by someone authorised by HBF to give that direction;
- comply with all policies and procedures that apply to their employment or engagement;
- complete all mandatory risk and compliance training within designated timeframes;
- act consistently with all competency requirements for their role; and
- disclose any contravention of a law or regulation which will or has the potential to affect HBF.

Avoid conflicts of interest whether actual, potential or perceived

HBF Personnel avoid conflicts of interest when they:

- recognise any personal interest that conflicts with the interests of HBF;
- ensure that any actual, potential or perceived conflict of interest does not affect HBF's operations, decisions or reputation;
- disclose and register any actual, potential or perceived conflict of interest;
- notify and disclose to their People Leader (for employees), Board chair (for directors, officers and councillors) or contract manager (for contractors) any actual, potential or perceived conflict of interest;
- do not use inside or confidential information to gain, or seek to gain, a benefit for themselves or a third party;
- do not use their position, job, role, authority, work duties or status to gain, or seek to gain, a benefit for themselves or a third party
- notify HBF if they have or form a relationship with another of HBF's Personnel that presents an actual, potential or perceived conflict of interest; and
- work with HBF to manage on an on-going basis any conflict which is unavoidable.

Comply with all external communications and official information requirements

HBF Personnel comply with all external communications and official information requirements when they:

- do not communicate with media, government or third parties without written authorisation or unless required by law;

- do not comment publicly on external social media on behalf of HBF unless they have been authorised to do so;
- decline to comment in respect of any matter they are not authorised to comment on; and
- comply with their privacy and confidentiality obligations.

Use HBF technology, assets and social media responsibly

HBF Personnel use HBF technology, assets and social media responsibly when they:

- use HBF technology and assets in accordance with HBF's key group policies;
- take reasonable steps to protect HBF technology, assets and property from loss, damage, misuse, misappropriation or theft;
- do not imply or suggest that HBF endorses or supports any of their own personal views; and
- do not make offensive, inappropriate, disparaging, demeaning comments, remarks or posts about HBF, its officers, councillors, directors or employees.

Treat others with respect and courtesy and without bullying, harassment or unlawful discrimination

HBF Personnel treat others with respect and courtesy, and without bullying, harassment or unlawful discrimination when they:

- treat others with care, consideration, respect and fairness;
- help make and contribute to a safe and inclusive workplace;
- recognise diversity and the differences that each person brings to the workplace;
- ensure that their conduct is not likely to humiliate, offend, intimidate or harass others;
- do not engage in conduct that creates a risk to the health, safety or wellbeing of others; and
- avoid behaviours in the workplace that may make others uncomfortable including, but not limited to:
 - making sexually suggestive comments or jokes;
 - asking intrusive questions about an individual's private life;

CONSEQUENCES OF BREACHING THIS CODE

Employees who breach or who authorise, permit or are involved in any breach of this Code may be subject to disciplinary action, up to and including summary termination of employment and/or reduction down to zero of any incentive.

Any breach of this Code by a contractor, or by any person engaged by the contractor, will be dealt with in accordance with the provisions of their relevant engagement contract.

Councillors, officers or directors who breach or who authorise, permit or are involved in any breach of this Code may be subject to such action as is appropriate under the Constitution of HBF or the *Corporations Act 2001* (Cth) (as applicable).

Where a breach of this Code may also involve a breach of any law or regulation, HBF may report the conduct to law enforcement officers and government agencies or departments.

- asking or making intrusive comments about an individual's physical appearance;
- unwelcome hugging, touching, kissing, cornering or other types of inappropriate physical contact;
- making unwanted advances or invitations to go out on dates;
- requesting physical intimacy; and
- sexually suggestive or explicit text messages, images, phone calls, social media messages or emails.

Put health, safety and wellbeing first

HBF Personnel put health, safety and wellbeing first when they:

- take all reasonable and practical steps to ensure the health, safety and wellbeing of themselves and all others in the workplace;
- comply with HBF's workplace health, safety and wellbeing policies;
- obey all reasonable instructions to work safely;
- ensure their work attire complies with relevant health, safety and wellbeing requirements for their role;
- report any health, safety and wellbeing issues, hazards or incidents as soon as they become aware of them; and
- attend work fit to perform their duties without impairment from drugs or alcohol.

Report any contraventions of this Code

Any contravention of this Code must be reported:

- by employees, to:
 - their People Leader;
 - any member of the Senior Management Team or the Executive; or
 - to a member of the Compliance team or HR team;
- by councillors or directors, to the Board chair; and
- by contractors, to their contract manager.

Note - any failure to report a breach of this Code, is a breach of the Code.