

Code of Conduct Policy

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Approved By:	Executive Leadership Team	Policy Owner:	Head of People and Culture
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1. Scope

- 1.1 This Code of Conduct Policy applies to all employees of Scope Global and its subsidiaries. The term ‘Employee’ used in this Policy includes Board members, agents, representatives and consultants and subcontractors engaged on service agreements. The term ‘Manager’ used in this Policy includes line managers, senior managers, executive managers, and Scope Global Representatives. It applies regardless of the:
1. Nature or level of employment
 2. Employment status (on-going, fixed-term, casual, Services Agreement, 3rd party employees)
 3. Physical location of the work area.

2. Objectives

The Code of Conduct objectives:

- 2.1 To guide and support employees in their professional activities.
- 2.2 To maintain and strengthen public trust and confidence in the integrity and professionalism of Scope Global by ensuring that it’s employees:
- maintain appropriate standards of conduct
 - develop those skills necessary for the efficient performance of their duties
 - maintain fairness in decision making
 - maintain and enhance the reputation of the company
 - adhere to appropriate ethical standards
- 2.3 To set out the standards of professional conduct expected of all employees, namely:
- A commitment by employees to conform to the professional standards that could reasonably be expected of a person in that role.
 - Demonstrate conduct which is professional and which has regard to Scope Global’s policies and wider interests.
 - Demonstrate behaviour which will not compromise either their own, or Scope Global’s values.
- 2.4 An important consideration in the design of the Code is a recognition that employees in striving for excellence, are to rely on exercising good judgement and common sense rather than a prescriptive, rigid set of rules in the performance of their work duties.
- 2.5 The Code therefore places an emphasis on guiding values and principles of behaviour.
- Failure to comply with the Code’s provisions will be managed and dealt with under the relevant policy and procedure, employment contract and/or subcontract agreement as applicable. A failure to comply with this Code may constitute misconduct resulting in disciplinary action and/or termination.

Standards of Conduct

3. Personal and Professional Conduct

- 3.1 All employees of Scope Global are required to exhibit the highest standards of professional conduct.
- 3.2 As a Scope Global employee you are required to:
- Act with the highest standards of integrity and in accordance with applicable policies, procedures and objectives at all times
 - Adhere to all legislative requirements and to lawful directions that relate to your job functions and responsibilities
 - Comply at all times with lawful and reasonable direction
 - When travelling, respect the laws and values of the visiting country
 - Undertake job activities in an economical, effective and efficient manner
 - Conduct all interactions with members of the community and colleagues in accordance with the highest standards of tolerance, honesty, empathy and compassion
 - Work cooperatively with colleagues, support and learn from each other and accept differences in personal style
 - Treat all persons with respect
 - Seek when necessary, the professional opinions of colleagues in their area of competence and acknowledge their contribution.

4. Behaviour outside Hours of Duty

- 4.1 Employees will not at any time act in a manner that a reasonable person would view as bringing them or Scope Global into disrepute, or that is otherwise improper.
- 4.2 Employees are advised that their activity or behaviour outside of working hours could bring the integrity of Scope Global into disrepute.

5. Alcohol and Drugs

- 5.1 Alcoholic beverages shall only be consumed on Scope Global premises at official company functions or in special circumstances if appropriate. In these circumstances, employees must consume alcohol responsibly and ensure that they uphold the appropriate standards of behaviour at all times, in accordance with this Code of Conduct.
- 5.2 Employees must not present to Scope Global premises or while on official Scope Global business, impaired by the effects of alcohol or other drugs and must at all times carry out their duties and responsibilities in a safe manner.

6. Personal Presentation

- 6.1 In order to promote an image that enhances Scope Global's positive corporate reputation, all employees will maintain a standard of grooming and personal presentation that is appropriate for their work environment.

7. Equal Opportunity

- 7.1 Scope Global is committed to ensuring an equitable and inclusive work environment free from discrimination and harassment. To that extent, all employees must not discriminate against, or harass a colleague, member of the public or any person with whom they come into contact during the course of their work. Each employee has a particular responsibility for implementing this policy in relation to their own area of work.
- 7.2 Behaviour that constitutes discrimination or harassment will not be tolerated under any circumstances and disciplinary action may be taken.

7.3 Scope Global does not tolerate sexual exploitation, abuse or harassment and expects all employees to comply with the Scope Global Preventing Sexual Exploitation, Abuse and Harassment (PSEAH) Policy.

8. Work Health and Safety

8.1 All employees are required to comply with the safety policy, procedures and regulations set out in the Work Health and Safety Policy. It is the duty of every employee to exercise personal responsibility and to do everything possible to prevent injury to themselves, other employees and members of the public.

8.2 All employees must take reasonable care to:

- Avoid adversely affecting their own health and safety or the health and safety of any other person through any act or omission at work, or by the consumption of alcohol or drugs
- Follow safe and healthy work practices
- Report hazards in the workplace and make recommendations to management on how to reduce the level of risk
- Make proper use of available safety procedures, safety devices and personnel protective equipment
- Not (or cause another worker to) interfere with, remove, displace or render ineffective any safeguard, safety device, personal protective equipment or another appliance or work system provided for protection; except when necessary as part of an approved maintenance, repair or emergency procedure
- Assist accident investigators or workplace inspectors
- Report accidents, injuries and near miss incidents to management as soon as possible after the event and actively support the consultation process.

9. Ethical Behaviour

9.1 It is the responsibility of all employees to familiarise themselves with the content of this Code and to conduct themselves in a manner which is consistent with Scope Global's values, and standards of professional conduct that are set out in this Code.

9.2 Employees shall comply with all lawful and reasonable directions provided by Scope Global. Complaints arising out of such directions shall be discussed, and attempted to be resolved, with your manager. Employees dissatisfied with the outcome or progress can lodge a formal complaint to have the matter resolved. Employees must continue to carry out any lawful and reasonable directions that may be given until the matter is resolved.

9.3 Employees are encouraged to report to a manager any behaviour by another employee they consider to be unethical. This may include behaviour that they believe violates any law, rule or regulation or represents corrupt conduct, substantial mismanagement of resources, or is a danger to public health or safety or to the environment. Reports of such shall be protected against reprisals providing the claim is based on a reasonable belief, is reported to an appropriate person and is not vexatious in nature.

10. Respect for the Law and System of Government

10.1 All employees have an obligation to observe the relevant jurisdictional laws where they reside and work and are to comply with Scope Global's policies and procedures. In addition, they have an obligation when travelling abroad to respect and abide by the customs and laws of the host country.

11. Respect for People

11.1 This ethical principle covers the conduct of employees in their dealings with others including other employees, program participants, external organisations and members of the

community. Scope Global supports the principles of procedural fairness and values social justice, equal opportunity and the provision of a safe and supportive working environment, and as such, all employees are expected to treat others fairly, honestly and responsibly, and with proper regard for their rights and obligations.

11.2 Employees are expected to:

- Promote a high standard of respect for all employees, program participants and the general community
- Treat other employees with courtesy and fairness
- Be responsive and prompt in dealing with other employees, volunteers and the general community
- When supervising employees, create a fair and just working environment
- Observe procedural fairness when engaged in decision-making
- Not engage in discriminatory conduct on grounds such as gender, sex, sexuality, race, disability, cultural background, religion, age or political conviction
- Not engage in behaviour which may reasonably be perceived as sexual exploitation, sexual abuse, sexual harassment, harassment, bullying or intimidation
- Have respect for cultural differences
- Respect the privacy of others in the collection, use and access of personal information whilst performing duties or activities.

12. Public Comment

12.1 Whilst it is recognised that employees have the right as an individual to make public comment, employees shall not reveal confidential or sensitive information in public. Information of a confidential nature shall not be used by any employee in any public comment without the prior approval of the Chief Executive Officer (or delegate).

Such comment will nonetheless be restricted to factual information and professional advice and avoid the expression of personal opinion.

Public comment includes providing information or comment to any media (electronic or print), posting comment on the internet, and speaking engagements.

Notwithstanding the above, employees may engage in a private capacity in conduct intended to influence public opinion on an issue or, or to promote an outcome in relation to an issue of public interest, except if;

- a) It is reasonably foreseeable that the conduct may seriously prejudice Scope Global in the conduct of its operation or policies;
- b) The conduct involves disclosing any information in breach of intellectual property or sensitive information; or
- c) The conduct is disgraceful or improper conduct that reflects seriously and adversely on Scope Global.

Employees are encouraged to discuss any planned public comment or event if they relate to the above points with the CEO or Marketing and Communications Manager.

12.2 All media interaction must be directed to the Chief Executive Officer (or delegate). Approval from the Chief Executive Officer (or delegate) shall be required before employees approach the media, or respond to media approaches on any company related issue.

13. Security of Information

13.1 All employees shall comply with the terms in their contract in respect to policies relating to Confidentiality, Privacy and Intellectual Property.

- 13.2 Employees will ensure the privacy of individuals is maintained and only release information provided for within the intent of the Scope Global Privacy Policy.

14. Fraud Prevention, Detection and Investigation

- 14.1 All employees are responsible for immediately disclosing any suspected or committed fraud, misconduct or corruption of which they become aware to the Chief Executive Officer, Head of Finance or any member of the Scope Global Executive Leadership team.
- 14.2 Employees are expected to report any workplace behaviour that a reasonable person would suspect violates any law or represents corrupt conduct, mismanagement of Scope Global resources, is a danger to public health and safety or to the environment, or amounts to misconduct.

15. Gifts and Benefits

- 15.1 Gifts are defined as free items or hospitality exceeding common courtesy that are offered to an employee in association with their work. They may be enduring or consumable. They range in value from nominal to significant and may be given for different reasons.
- 15.2 Benefits are defined as the giving of preferential treatment, privileged access, discounts, favours or other advantage offered to an employee. While the value of benefits may be difficult to quantify in dollars, they may be highly valued by the intended recipient and therefore used to influence their behaviour.
- 15.3 Guide to Behaviour:

An underlying guiding principle in consideration of gifts and benefits is that employees act with integrity and honesty in the conduct of their duties.

This means that they should be impartial and not be improperly influenced by, or seek to improperly influence others.

The acceptance of any gift or benefit by employees can have the potential to secure the influence or favour of an employee in the performance of their duties. The main risk of accepting a gift or benefit is that it may result in an actual or perceived conflict of interest. At the extreme, it could be perceived as a bribe, which is a criminal offence in Australia.

It is deemed unacceptable for:

- An employee under any circumstances, to accept money from any party other than a wage or salary received from their employer for the performance of their work duties
- An employee to solicit or accept any gift or benefit, the receipt or expectation of which might in any way influence, or appear to tend to influence, the employee in his or her discharge of their duties

Non-pecuniary gifts or benefits offered to employees by representatives of Scope Global may be accepted, as may gifts from other non-Scope Global sources if they are obviously mementos or gifts of a symbolic nature, or where the cultural values of the person or group would suggest that the gift should be accepted in the normal course of conducting business.

- 15.4 If an employee is uncertain about whether they should accept a gift or benefit, they should discuss the matter with their manager.

16. Conflict of Interests

- 16.1 Employees are required to conduct business in a manner that will ensure client trust and confidence in Scope Global. Conflicts of interest can pose a potential hazard and it is vital

that clients have confidence that Scope Global and its employees will act impartially and without prejudice.

- 16.2 A conflict of interest can be actual or potential. It relates to circumstances where an employee is, or could be influenced, or there is a potential for them to be influenced. Employees must not engage in other employment or other remunerative activity where the activity conflicts or has the potential to conflict with their role in Scope Global, or the performance of such outside employment or activity might affect their capacity to perform their duties.
- 16.3 Employees will avoid actual or potential conflicts of interest, and shall report potential conflict of interest matters to their manager in writing at the earliest available opportunity, and comply with any lawful and reasonable direction to ensure the situation is assessed and managed in Scope Global's best interest to resolve the conflict, or potential conflict.

17. Relationships in the Workplace

- 17.1 Scope Global recognises that there may be instances where personal relationships are formed in the workplace. Personal relationships are defined as relationships which extend beyond professional relations and include; family relationships, emotional relationships (including sexual relationships) or financial relationships (where there is a financial or commercial partnership or connection).
- 17.2 Scope Global's view is that such relationships could have the potential to create conflicts of interest. In the event that a personal relationship at Scope Global is formed and where it could reasonably be considered to create a conflict of interest, there is a requirement for employees to disclose the relationship to the Head of People and Culture. Disclosure will be treated confidentially and an assessment and decision will be made regarding any necessary changes required to minimise risk of potential or actual conflicts of interest.

18. Criminal Offences

- 18.1 Employees shall immediately notify their manager if charged with an offence. As part of Scope Global's recruitment process, all new employees shall undertake a National Police Clearance and notify Scope Global of any previous offences that would impact their ability to comply with any Scope Global policies.

19. Child Protection

- 19.1 Scope Global is committed to the safety and protection of children from all forms of abuse and exploitation and fully understands its fundamental duty of care towards protecting children engaged within Scope Global programs and activities.
- 19.2 Scope Global has a zero tolerance of child abuse and require all employees to strictly abide by its Child Protection Policy, including the requirement to follow acceptable behaviours and to immediately report any concerns or allegations of child exploitation or abuse to Scope Global's Child Protection Officer.

Scope Global's Child Protection Officer contact details are as follows:

Position: Child Protection Officer – Case Manager, New Colombo Plan
Phone: +61 8 7120 8400
Email address: cpo@scopeglobal.com
Postal address: Level 5, 12 Pirie Street Adelaide SA 5000