

Code of Conduct

1. Purpose

This Code of Conduct (**the Code**) aims to:

- Provide guidance as to the minimum standard of personal conduct and professional behaviour expected of all auDA directors, employees, consultants and contractors
- Support auDA's business reputation and corporate image within the community, and
- Make everyone aware of potential consequences if they breach the Code.

People who agree to work for auDA, agree to abide by and honor the spirit of the Code.

The Code sits alongside and does not replace rights and obligations under contract, common law and statute.

It provides guiding principles to help everyone make decisions about what is acceptable and unacceptable behaviour, particularly where judgment is required in handling situations where the right course of action may be unclear or ambiguous.

2. Scope

All employees must comply with the Code. A reference to '**employee**' for the purpose of the Code includes all auDA directors, employees, consultants and contractors.

The Code applies to all business activities with suppliers, contractors and other stakeholders.

Responsibility lies with every person covered by the Code to conduct themselves in accordance with it.

3. Guiding principles

There are four guiding principles underpinning the Code:

- Respect for the law and auDA's policies, guidelines and procedures
- Fair and equitable treatment of all people
- Maintaining the highest level of personal and professional behaviour
- Exercising care and due diligence



3.1 Respect for the law and auDA's policies, guidelines and procedures

All employees are expected to:

- Act in accordance with auDA's purpose, values, goals, policies, procedures and guidelines
- Understand and comply with relevant Federal, State and Territory laws
- Respond appropriately to any reasonable and lawful directions by persons who are authorised to give those directions.

3.2 Fair and equitable treatment of all people

All employees must:

- Treat everyone with respect and dignity
- Treat everyone with fairness, courtesy, equity, patience and tolerance
- Be respectful of differences and not engage in any form of discriminatory activities
- Not racially discriminate against employees or stakeholders
- Not harass, bully, insult, vilify, or intimidate anyone
- Not engage in hate speech or hateful behaviour or any other conduct that vilifies a person or group, being conduct that is hateful towards, or is likely to incite hatred, serious contempt, revulsion or severe ridicule of, a person or group because of race, religious belief or activity, disability, gender identity, sex, sex characteristics, sexual orientation, or personal association with a person with any of those attributes
- Recognise that these obligations apply to conduct that can be seen or heard by the public, including online and on social media, and to work-related conduct outside the workplace and outside usual working hours

Not act in a way that would unfairly damage auDA's reputation or any of its employees or anyone who has dealings with auDA. Vilification is unlawful under the *Equal Opportunity Act 2010 (Vic)*, and serious vilification is a criminal offence under the *Crimes Act 1958 (Vic)*. Individuals may be personally liable for their conduct, and auDA may be liable for the conduct of its employees, so any concern about vilification must be reported and addressed promptly.

3.3 Maintaining the highest level of personal and professional behaviour

All employees must ensure that they:

- Maintain the level of trust of other employees and other stakeholders by managing actual or perceived conflicts of interest in accordance with the Conflicts of Interest Policy



- Do not accept gifts, benefits, hospitality or other inducements, whether financial or otherwise, which do not meet the requirements of the Gifts, Benefits, Hospitality & Political Donations and Engagement Policy
- Do not attribute opinions and comments to auDA that have not been authorised by auDA
- Do not knowingly make or support statements that are misleading, untrue or defamatory.

3.4 Exercising care and due diligence

All employees are expected to:

- Carry out their duties and responsibilities in a professional, responsible and conscientious manner
- Make decisions appropriate and reasonable to the circumstances
- Report genuinely suspected dangerous or fraudulent actions by employees or anyone else involved with auDA
- Take reasonable steps to ensure adequate protection of confidential and personal information
- Act in a manner which supports and promotes auDA in the best possible manner
- Use auDA property responsibly.

4. Stakeholders

auDA does not condone abusive behaviour by anyone. Stakeholders are expected to act toward auDA employees with integrity and openness and conduct themselves in a fair, professional manner that is free of bullying, harassment, vilification, victimisation, racism and abuse. Please refer to auDA's Engagement Charter.

Public facing employees should not be subjected to abusive behaviour from external people. If this occurs, the employee should raise it with their manager in the first instance. Consequences of a breach of this Code of Conduct by external stakeholders include the following:

auDA may restrict:

- Who that person may contact at auDA
- What issues auDA will respond to
- How that person may contact auDA personnel.

In exceptional circumstances, auDA may stop engaging with that person.



5. What to do if a breach occurs

auDA takes its commitment to the Code very seriously. Any breach of the Code may lead to disciplinary action, up to and including dismissal. In addition, any breaches which also break the law may result in personal liability for those responsible for the breach.

If an employee has any genuine concern about any behaviour or situation which may be in breach of the Code or potentially breaches the law, they may raise it with:

1. the person or persons responsible for the breach or potential breach if you feel you can raise this issue with them;
2. your manager,
3. the relevant Executive
4. a People & Culture team member or
5. the Chief Executive Officer or the auDA Board Chair.

If the concerns in question relate to the Chief Executive Officer or a Director, the matter should be raised with the Board Chair with the assistance of a Company secretary as necessary.

Everyone is encouraged to be an upstander by speaking up and taking action when they see, or know of, distress or harm to others, and cooperate with any action taken to comply with the requirements of this policy, including participating in any inquiries or investigations about incidents.

Employees should also refer to the Whistleblower Policy and the Workplace Complaints Resolution Procedure for additional guidance about raising concerns of breach of the Code.

Appropriate action in response to the report will be taken.

There will be no victimisation of any employee who genuinely raises concerns or complaints.

6. Responsibilities

The **Board** is responsible, through the **Governance & Culture Committee**, for reviewing the Code and approving any changes to it.

The **Governance & Culture Committee** is responsible for reviewing the Code and making recommendations to the Board.

The **Chief Executive Officer** is responsible for ensuring that the Code is kept up to date and promoting and supporting compliance with it.



All **employees** are responsible for being aware of and complying with this Code of Conduct.

7. Related documents

- Workplace Complaints Resolution Procedure
- Gifts, Benefits, Hospitality & Political Donations and Engagement Policy.
- Equal Employment Opportunity and Workplace Behaviours Policy
- Social Media Policy
- Conflicts of Interest Policy
- Anti-Bribery, Corruption and Fraud Policy
- Health, Safety & Wellbeing Policy
- Whistleblower Policy
- Engagement Charter
- Conduct Complaints Policy

8. Document control

Owner: Chief Executive Officer

Committee / Board Review Function: Governance & Culture Committee – Tier 1

Next Review Date: August 2028

Version	Change	Approval	Date
1	Original	Board	16 September 2019
2	Updated and Rebranded	Board	30 March 2021
3	Ashurst review	Board	12 April 2023
4	Minor update	Board	8 April 2025
5	Legislative updates	Board	27 August 2026