



Code of Conduct and Ethics

Overview

This code of conduct explains the minimum standards of behaviour that we expect from our team members.

Scope

This policy applies to St George Community Housing Limited and its subsidiaries (we, our and us) and to our employees, contractors, directors and volunteers (our team members).

Our values and expected behaviours

Our values are important beliefs that motivate people to act one way or another and serve as a guide for our behaviours. Our values are:

Empowerment

We empower our people, partners and our customers.

- I look for the strength in others and support them to achieve their goals
- I listen to understand
- I speak up to ensure safety and wellbeing

Trust

We take ownership and accountability to build trust.

- I do what I say I will do
- I am held to account for my actions
- I support and collaborate with others
- I place the customer at the heart of everything I do

Honesty

We are responsible, ethical and professional.

- I am open and transparent
- I admit and learn from my mistakes
- I behave in a way that aligns with the Code of Ethics & Conduct

Inclusion

We respect differences and treat people equally.

- I seek out different perspectives
- I welcome different people
- I create safe spaces for people to belong and contribute
- I consider the customer perspective in my decision

Creativity

We explore new and better ways of working.

- I learn and grow
- I strive to continually improve



- I look for ways to make things simpler
- I look for ways to improve customer outcomes

Our Code

Acting in our interests

Our team members must always act in our interests. This includes supporting on a professional level all formal decisions we make.

Obeying the law

Our team members must follow all relevant laws, regulations, and standards.

Discrimination, Harassment and Bullying

Our team members must not engage in discriminatory conduct.

Our team members must treat others in the workplace fairly, and must not discriminate against them, or sexually harass or harass (including on the grounds of sex), bully, vilify or victimise them, or engage in conduct that is unwelcome or inappropriate.

Following our policies & procedures

Our team members must follow our policies and procedures.

Acting professionally

Our team members must act professionally towards other team members, customers and others we work with outside the company. Team members must do what they reasonably can to provide good customer service. Our team members must make sure that they:

- Communicate clearly, promptly, politely and are courteous, fair, respectful and professional
- Follow our Website and Social Media Policy and any related guidelines
- Act professionally in all social interaction during work hours
- Avoid social interaction with our external customers outside of work – where this is not possible, our team members must tell their manager so that any potential conflicts can be managed
- Respond to all stakeholder contact within agreed timeframes
- Do not communicate their personal mobile/phone numbers to customers and their supports
- Do not misrepresent us to others or mislead others.

Use of your position

Our team members must not use their position with us to get any improper benefit for themselves or another.

Anti-Bribery, Corruption, Gifts and Benefits

We have a zero tolerance approach to bribery and corruption. Our team members must not engage in or encourage corruption or allow others to do so on our behalf. Our team members must not offer, promise, give, accept, request, or authorise a bribe, whether directly or indirectly.



We don't encourage or expect gifts from customers, contractors or business associates but we understand that small gifts/benefits may be offered or received as a token of appreciation.

Gifts must not influence, or seem to influence, our decisions.

Our team members must declare any gift or benefit they receive, or are offered, as outlined in our Anti-Bribery, Corruption, Gifts and Benefits Policy.

Conflicts of Interest

A conflict of interest is where someone's personal interests conflict with their responsibility to act in our best interests. A personal interest isn't just your own interests and could include the interests of a person that you have a close personal/family relationship with, or other organisations or companies that you are involved with.

Conflicts of interest include actual or perceived conflicts, or potential conflicts that could exist in the future.

Our team members must disclose conflicts of interest as outlined in our Conflicts of Interest Policy.

Directors must disclose conflicts of interest as outlined in our Directors' Code of Conduct and our Conflict of Interest Policy.

Our Assets

Our team members must respect our funds, equipment and property and should use and maintain these resources with due care. We allow reasonable personal use of the telephone, photocopier, printer, email and the internet. Use of our letterheads is specifically for our business use only. Our team members must follow policies relating to our assets including our Motor Vehicles and Mobile Devices policies.

Our resources must never be used for:

- Private commercial activity, personal or financial gain
- Causing harm to our entities or customers
- Any activities including jokes or pranks that are inappropriate or offensive
- Transmitting material that may damage our reputation
- Accessing or transmitting information that could be misleading, deceptive, or illegal
- Gambling
- Subscribing to or accessing fee-based services for personal use
- Purposes which will adversely affect the performance of our networks, email system or other operations

Our information and confidentiality

Our information must only be used for our purposes and not for personal benefit. Our information that has not been released to the public via our website, the annual report, or media releases, should be considered confidential unless otherwise stated by our CEO.

Confidential information can include physical records (such as hard copy files and documents) and electronic documents (such as emails, electronic records, internal reports). Our team



members must not make or appear to make public comments on our behalf unless specifically authorised.

Our team members have a responsibility to make and keep accurate records.

Our team members must only access our records when it is relevant to their work. Team members may access their own employee record in One Housing but must not access the records of employees, family, friends, or business associates.

Misconduct

We expect our team members to act appropriately in all situations, not engage in any misconduct and report any misconduct that they become aware of. Misconduct includes:

- fraud or misappropriation of funds
- negligence
- wilful default of obligations and duties of the team member or on our behalf
- breach of duty
- financial irregularities
- offering or accepting a bribe
- corrupt conduct, maladministration, and waste of resources
- offences under the Corporations Act 2001 (Cth) or the ASIC Act 2001 (Cth)
- an offence against any other Commonwealth law that is punishable by imprisonment for 12 months or more
- illegal conduct, such as theft, dealing in, or use of illicit drugs, violence or threatened violence, and criminal damage against property
- serious failure to comply with any legal or regulatory obligations
- sexual harassment, discrimination, bullying or harassment
- unethical or other serious improper conduct, including serious breaches of company policies and procedures
- engaging in, or threatening to engage in, detriment as defined in our Whistleblower Policy
- systemic issues that a relevant regulator should know about

Team members should refer to our [Whistleblower Policy](#) for more information about making a Protected Report.

Alternative employment

Our team members must not undertake any employment with another organisation that is a supplier or competitor or any other employment that conflicts with their position with us. If our team members want to undertake additional employment such as a second job, they should discuss this with their manager to make sure that it will not impact their role with us. Our team members must get permission from the CEO if they want to be a Director of another company (other than a family company) including a not-for-profit entity.



Breaches of the Code

Our team members must follow this Code of Conduct and Ethics.

If our team members believe that a team member is, or may be, in breach of this code, they should report the breach or suspected breach as early as possible. If our team members report behaviour which they honestly believe is a breach, we will treat the report confidentially and will protect the person from any retaliation.

However, if our team members make reports which they know are false to annoy or cause harm to another person, we may consider taking disciplinary action against them, which may include terminating their employment.

We do not accept misconduct and are committed to addressing any inappropriate behaviour and making sure that our team members are not penalised for making a genuine report or complaint.

Reporting and Investigation

If a breach relates to misconduct as defined in our Whistleblower Policy, a Protected Report can be made under that Policy.

If the breach does not relate to misconduct, team members are encouraged to discuss their concerns with their manager to resolve and address any concerns. If their concerns involve their manager or they do not feel comfortable discussing their concerns with their manager, team members can discuss their concerns with a Whistleblowing Protections Officer.

If a team member is unsure whether their concerns relate to misconduct, they should refer to our Whistleblowing Policy for more information or speak to a Whistleblower Protections Officer under that Policy.

Relevant laws, regulations or standards

- *Fair Work Act 2009* (Cth)
- *Anti Discrimination Act 1977* (NSW)
- *Work Health and Safety Act 2011* (NSW)
- *Racial Discrimination Act 1975* (Cth)
- *Sex Discrimination Act 1984* (Cth)
- *Australian Human Rights Commission Act 1986* (Cth)
- *Disability Discrimination Act 1992* (Cth)
- *Age Discrimination Act 2004* (Cth)
- *Anti-Discrimination and Human Rights Legislation Amendment (Respect at Work) Act 2022* (Cth)

Policy information

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