



G8 Education^{ltd}

G8 Education

Code of Conduct

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Our Code of Conduct

About our Code

At G8 Education Limited (“G8”) we are helping shape the lives and minds of young children every day, championing early learning in the first five years, through innovative and evidence-based care and teaching methods. With a clear purpose of **creating the foundations for learning for life**, we are committed to becoming the leading provider of quality early childhood education and care.

Our families trust us to provide high quality care and education for their children. We recognise that building and retaining trust depends on the ethical and responsible behaviours, conduct and ways of working of our team members.

Our Code sets the standard and provides guiding principles of what behaviours, conduct and ways of working that are expected at G8. It also guides you on where to go for further information and support if you are unsure of what to do.

This Code is reviewed annually by the Board and it may be updated when changes are made to G8’s strategy to ensure that it is operating effectively and that it remains consistent with G8’s core values. Please check for the latest version available from TeamM8’s.

Who does our Code apply to?

Our Code applies to all team members, including employees (permanent, temporary or casual), Board members, agency staff, contractors, volunteers or other persons whenever you are identified as representatives of G8 (including by wearing a uniform). This means there may be circumstances where this Code applies outside working hours or away from your workplace.

All agents, contractors, consultants and other third parties should be advised that G8 expects them to observe our Code when we engage them to work with us.

What do you need to do?

It is expected that you will review and understand our Code during your induction, and all new employees must provide a declaration that they have read and understood the principles in the Code and agree to comply with our Code moving forward. It is your responsibility to regularly review our Code and the our Code when you are representing G8. As part of the G8 team, we also encourage you to remind others to do the same.

It is not an excuse that you are unaware of our Code, our policies or the law and regulations that apply to you. You are responsible for reading and understanding your obligations, and for seeking further information and support if you do not.

If at any time you are unsure about what is expected of you, or how you should proceed with any issue in order to comply with our Code you should ask your Manager or your People & Culture Business Partner for advice.

What happens if you breach our Code?

We take compliance with our Code very seriously. A failure to comply with the principles set out in our Code will be deemed a breach of G8’s policies and may result in an investigation, where necessary or appropriate.

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All investigations will be completed in a fair and just manner, in accordance with our [Managing Complaints and Grievances Procedure](#). If a breach is substantiated, you may face disciplinary action including termination of your employment or engagement agreement with G8.

Any breach of our Code (through your action or inaction) that results in actual or potential harm to you or others may be subject to disciplinary action.

If the circumstances involve a breach of law or other regulations, a breach may also be referred to the appropriate regulatory body and/or result in legal proceedings commenced against you. If this occurs, G8 is not responsible for any legal or other cost associated with your defence.

Breaches of the Code will be reported to appropriate persons within G8 which may include your Executive Leader or the Board.

Related documents: *Managing Grievances & Complaints*

Speak up

We encourage and expect you to report any breaches of our Code, including where you think a breach may have occurred, but you are not sure. By reporting your concerns, you help us to prevent problems from occurring or rectify unlawful behaviour that has already occurred.

G8 will protect from retaliation any team member who raises concerns honestly and in good faith. This means that your concern doesn't have to be right, but you have to believe in good faith that the information you are providing is true and accurate. It is a breach of our Code to retaliate against an employee who has raised concerns under the Code in good faith, or to discourage or prevent a team member from making a report or seeking assistance under this Code.

If you feel that you are under pressure to do something that is inconsistent with our Code, or if you observe others engaging in activity that you think might be inconsistent with our Code you should raise this with your 1 Up or 2 Up Manager. If you do not feel you can raise your concern with this person, please contact your People & Culture Business Partner or the Chief Legal, Quality and Risk Officer for further guidance on where to go.

If your concern relates to misconduct, an improper state of affairs or circumstances or a contravention of legislation or regulatory requirements it may be *reportable conduct* that can be reported anonymously under our Whistleblower Policy. Please see our Whistleblower Policy for more details.

It is a breach of this Code to knowingly make a false accusation, to interfere with an investigation or to lie to an investigator.

A special note to Managers

If you are a Manager (including Centre Managers), it is critically important that you act as a role model for others by always following our Code, our policies and the law. Make sure that your team members have access to this Code and ensure that the requirements of this Code are reflected in your day to day management and leadership. You are responsible for enforcing our Code and for creating a working environment where your team members respect the Code and feel comfortable to raise concerns.

Related documents: *Managing Team Member Grievances and Disputes Procedure; Incident notification and investigation policy; Whistleblower Policy*

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Making Good Decisions

G8 acknowledges that this Code does not include every ethical issue that you might face, nor every law and policy that may apply to you when you work for or represent G8. It is therefore important that you understand our expectations around making good decisions and asking for help if you are unsure of how to proceed with an issue.

When making any decision, if doing the right thing is not clear, you should ask yourself the following questions:

- ✓ Is this decision consistent with our Code and G8 Policies and Procedures?
- ✓ Is this decision legal, ethical and safe?
- ✓ Is the decision in the best interests of children in the care of G8?
- ✓ Am I owning the outcome and does this decision reflect well on me, G8 and my Team Members?
- ✓ Would I be comfortable if this decision and my actions were made public?

If we answer “no” or “maybe”, you need to stop and get advice or ask questions. If you seek advice, raise concerns or report actual or potential breaches of our Code in good faith and are doing the right thing, you will not face any adverse consequences for doing so.

Working in our team

Our Values

G8 is building an exceptional team of early childhood educators, teacher, leaders, and support team who are dedicated, supportive and committed to children that are entrusted in our care each day. To do this, G8 expects you to always act in the best interest of G8 and to demonstrate our Values of:

- **Passion** – Doing what we love with enthusiasm and purpose
- **Integrity** – Striving to go above and beyond
- **Innovation** – Embracing new ideas that further develop our shared purpose
- **Dedication** – Showing empathy and kindness to others because we care
- **Compassion** – Consistently being respectful, honest, and fair in all that we do

Keeping Children Safe

G8 is committed to respecting and promoting the rights of every child as set out in the United Nations Convention on the Rights of the Child, including by always acting towards the best interests of children in our care, and respecting the right of every child to an education which develops their individual personality and talents to their full potential. This commitment is set out in our Child Protection Statement of Commitment.

You are expected to contribute to the creation of a safe and friendly environment where each child feels respected, valued, and encouraged to reach their full potential. On commencement of your employment and annually after that, everyone who is employed by or works at G8 must complete our Mandatory Child Protection Training and Child Protection Statement of Commitment. This Code is to be read in conjunction with the Child Protection Statement of Commitment which must always be adhered to.

Related documents: *Australian Children’s Education & Care Quality Authority (ACECQA); United Nations Convention on the Rights of the Child; National Quality Standard; Child Safety Policy; Child Protection Statement of Commitment*

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Working Safely

G8 expects you to work safely and to take reasonable care for your own health and safety, including the safety of yourself and others when carrying out your duties. You are expected to own safety outcomes by:

- ✓ identifying and correcting hazards as you become aware of them
- ✓ stopping and immediately reporting any tasks that you reasonably believe are unsafe
- ✓ always using gloves, masks or other personal protective equipment (PPE) for the required task
- ✓ following any applicable safety policies, procedures or processes
- ✓ reporting incidents and injuries immediately
- ✓ speaking up if you see anyone behaving in an unsafe manner

Your psychological health and safety is as important to us as your physical safety. If you do not feel ok, or you are aware that your team member does not feel ok speak up and ask for help. We care about your mental health and well-being and will do our best to support you, including through access to psychological counselling through our Employee Assistance Program.

You must be fit to perform your duties to work safely. Some reasons why you may not be fit to perform your duties include: consumption of alcohol or other drugs (including misuse of prescription medication), injuries or illnesses that affect your capacity to perform your role. If you are unfit to perform your role for any reason, or if your Manager reasonably believes you are unfit to provide care for children, you may be requested to leave the workplace in accordance with G8's Fitness for Work Procedure. If you breach our Code or engage in any form of misconduct whilst unfit for work, you will be treated as fully responsible for your conduct regardless of whether you have capacity. If a Manager has reasonable suspicion to believe that you are under the influence of drugs or alcohol, the Manager may request that you undergo drug or alcohol screening.

We encourage team members to speak up about unsafe behaviour in the workplace and support our team members to do this by providing access to advice, support and a safe process to raise and resolve issues, grievances and complaints through our [Managing Team Member Grievances and Disputes Procedure](#).

If you have any question or require more information about health and safety issues, please speak to your Manager for assistance or refer to the related documents.

Related documents: *Workplace Health and Safety Policy; Managing Fitness for work; Managing Team Member Grievances and Disputes Procedure.*

Inclusion and Diversity

G8's team members are as diverse as the communities in which we operate. Our Diversity, Inclusion and Belong Policy supports an inclusive culture where team members of different genders, gender identity, ethnicities, religion, sexual orientation, ages, physical abilities and other differences in all forms are welcomed and embraced. We are committed to having an inclusive workplace, and it is our expectation that you will respect the right of all our team members feel that they can be themselves in the workplace.

Related documents: *Diversity, Inclusion and Belonging Policy; Team Member Support and Management Policy; Team Member Support and Management Policy*

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Bullying and Harassment

G8 recognises that everyone has the right to work in a professional environment that promotes equal employment opportunities, prohibits unlawful discrimination and is free from bullying and harassment, including unwelcome behaviour of a sexual nature.

It is our expectation that you will not participate or contribute to any unlawful discrimination, bullying, harassment (including sexual harassment) or other inappropriate behaviour in the workplace. We encourage you to speak up if you observe any of these behaviours. Speak to your Manager or your People & Culture Business Partner if you are unsure how to report this behaviour.

Related documents: *Diversity, Inclusion and Belong Policy; Managing Team Member Grievances and Disputes Procedure;*

Human Rights

G8 is committed to supporting and promoting human rights that benefit all our stakeholders including our families, employees, shareholders, investors and the communities in which we live and operate. We are committed to ensuring our operations and supply chains do not engage in modern slavery practices, and to remedy any human rights violations that are reported to or identified by us. We recognise and seek to ensure that our practices align with the United Nations Universal Declaration of Human Rights and the United Nations Principles on Business and Human Rights.

Events and Functions

On limited and approved occasions alcohol may be provided during work-related events and functions, where food is also being provided. You must always use good judgement and never become intoxicated or act in a manner that could result in a breach of our Code, policies, any law or endanger the health and safety of others. You are responsible for ensuring your own safety at events and functions, including to have a safe method of travel home.

Where alcohol is being consumed during a work-related event (e.g. Christmas Party, Team Dinner, etc) the most senior Manager will be designated as the “**Responsible Person**” for the duration of the event (with an agreed start and finish time determined with reasonable consideration to the type of event). For a large event (greater than 20 team members) multiple Responsible Persons may be appointed. The Responsible Person will not consume alcohol prior to, or whilst in attendance for the agreed time of the event and will use reasonable efforts to ensure that all team members in attendance have departed at the agreed finish time.

Working in our business

Social Media and Communication

If you are using social media and networking sites, you must ensure that any use is in accordance with this Code of Conduct and relevant IT, media and communications policies.

You are expected to communicate politely, respectfully and safely with other team members, children, families, suppliers and other stakeholders at all times. This means you will not:

- ✗ make inappropriate, offensive, defamatory, insulting, or intimidating comments of any kind, including any direct or implied criticism or disrespectful comment about G8 or any current or former team member, or any child or family;

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- ✘ create, contribute or upload any content (including but not limited to documents, images, video or audio recordings) to any platform (including Facebook, Instagram, TikTok or other social media platforms) that relates directly or indirectly to G8 except where you are in an approved position to do so;
- ✘ respond to any media or investor enquiries unless you are in an approved position to do so;
- ✘ engage in any other activity which could reasonably be expected to harm the reputation or legitimate commercial interests of G8 and our team.

It is our expectation that you will use good judgment when using social media and communicating to others (refer to the 'Making Good Decisions' section above). If you are unsure whether you are in an approved position to use social media or communicate in compliance with this Code, consult with your 1 Up or 2 Up Manager before you act.

Related documents: *Information and Communication Systems Policy; G8 Educations Brand and Communication Guidelines; Communication and Respectful Conduct Policy; Network and Communications Policy; Network Communications Procedure; Media Protocols Policy*

Conflicts of interest

When you work for G8 you are expected to deal with our families and our suppliers fairly and to act in the best interests of G8.

You must avoid conflicts of interest between your own interests and the interest of G8. A conflict of interest may be any personal interest, relationship or activities that influence you (or may have the appearance of influencing you) to act in a way that is not in G8's best interest.

Some examples of potential conflicts include:

- ✘ **Secondary Employment** – Having a second job that may be perceived as a conflict of interest, e.g. working for another provider in the sector, babysitting or a consulting opportunity, must be approved by your Manager. A failure to disclose the second job is a breach of this Code. The second job may be approved if it does not interfere or conflict with your responsibilities as part of the G8 team. Where it is approved, you will be required to complete an 'Outside Employment Declaration' to be stored on your Personnel File.
- ✘ **Personal or Financial Relationships** – Close personal or financial relationships (for example, spouse, parent, parent-in-law, child, brother, sister, uncle, aunt, niece, nephew, grandparent, or business partner) between Team Members, between a Team Member and a family, or between a Team Member and a supplier to G8 can depending on all the circumstances, create an actual or apparent conflict of interest. If you have such a relationship with another Team Member or with a supplier to G8, you must immediately disclose that relationship to your Manager, or if such relationship involves your Manager, to your P&C Business Partner. Where a conflict of this nature exists we will endeavour to move the Team Member to reduce the impact of this conflict of interest, 2Up Manager approval will be required where this is not possible.
- ✘ **Gifts and Gratuities** – The offer or receipt of gifts or gratuities from another Team Member, a child, a parent or guardian, or from a supplier to G8 can, depending on all the circumstances, create an actual or apparent conflict of interest. Tokens of appreciation that are inexpensive and infrequent can be accepted. For example, a one-off gift that is valued

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less than \$100. More frequent or expensive gifts should be referred to your 1Up Manager for approval.

If you think you or another person may have a conflict of interest, you should disclose the potential conflict to your Manager. Managers should then seek advice from the G8 Legal Department regarding any potential conflict of interest and possible ways to eliminate or mitigate the risk.

Related documents: *Managing Conflicts of Interest Procedure; Outside Employment Declaration Form*

Anti-bribery and corruption

You are expected to behave honestly, with integrity and comply with all laws and regulations when representing G8. Bribery and other corrupt practices are not only inconsistent with our values, but can also significantly damage our reputation and expose both G8 and you to serious criminal and civil penalties.

Bribery and corruption can take many forms. A person engages in corrupt practices if they dishonestly abuse their position or offer benefits or gifts to provide an advantage or gain that is not legitimately due. The bribe or corrupt act might not necessarily involve the exchange of money, it could be in the form of hospitality, entertainment, favours or other inducement where the intention is to improperly influence someone to act in G8's favour, a Team Member's favour or for the benefit of another person.

You must not take advantage of your position or opportunities arising from your position at G8 or personal gain. Never offer money, gifts, entertainment or other gratuity to suppliers, individuals or public officials in order to gain an advantage for G8, yourself or any other party. If you are offered a bribe, gratuity, facilitation payment or other secret commission or suspect you may have been, you must decline the offer and report the matter to your 1Up or 2Up Manager or your People & Culture Business Partner.

Privacy and confidentiality

When you work for G8, you may be trusted with personal and confidential documents and information relating to G8, team members, children, families, and others. You must not share, discuss or disclose any personal or confidential information to any other person, except to the extent such discussion and/or disclosure is required to perform your duties or to comply with a legal requirement. If you are unsure as to the need to use, disclose or discuss any information or document, you should not disclose or discuss that information, and should instead seek advice and direction from your Manager or G8's Legal Team.

We expect you to:

- ✓ keep all of their passwords secure;
- ✓ not leave confidential or private information on desks or computer screens that could be seen by others;
- ✓ not copy or share information held within databases and systems with a third party unless authorised to do so; and

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- ✓ store all personal and confidential documents and files safely and securely, with access granted only to appropriately authorised Team Members; and
- ✓ immediately notify the G8 Privacy Officer, in accordance with G8’s Privacy Policy, if they become aware of or suspect that any confidential or personal information has been used for an improper purpose or has been disclosed to any person not authorised to access that information.

Any requests you for access to any personal information G8 holds about you should be made in writing to the G8 Privacy Officer in accordance with G8’s Privacy Policy.

Related Documents: *Information Security Management System (ISMS) Procedure Manual*

Use of personal devices

You must not use personal mobile phones and other electronic devices during work hours where such use interferes with your duties or could compromise the supervision of children.

At no time should inappropriate, offensive, or pornographic material be accessed on any device (including personal devices) at a G8 workplace or otherwise connected to G8. You must not take any photographic, video or audio recordings of children in the care of G8 on any personal device or transmitting any such recording to a personal device or any medium that is not within the custody and control of G8.

Related documents: *G8 Acceptable Usage Policy*

Use of organisational assets

When you work for G8 you will have access to G8 assets which include physical, electronic, and intellectual assets. This includes our computers, mobile devices, G8 buildings & technology, the ideas we develop, the resources and materials we use or produce, the emails we exchange and more.

You may use G8’s organisation assets solely for the purposes of carrying out your work duties, and it is expected that you will treat these assets with respect and protect them from damage, loss, misuse, and unauthorised access. You must not use any G8 property, information or other assets for any illegal or unethical purpose, improper personal gain or to cause detriment to G8 or its families.

Related documents: *IT Device Agreement; Information and Communication Systems Policy; Access Control Policy and IDAM Standard*

Securities Trading

As a team member of G8, you may become aware of confidential information that could affect the share price of G8 or another company that we are in business with. G8’s Securities Trading Policy sets out the legal guidelines and prohibitions on trading in G8 securities, and all team members are expected to read and understand the policy before buying shares. If you are unsure about whether or not you can trade shares, please contact the Chief Legal, Quality and Risk Officer.

Related documents: *Securities Trading Policy*

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Financial integrity

When completing any financial transaction for and on behalf of G8, you must ensure that the financial resources of G8 are used appropriately and prudently, and that all financial records are complete and accurate in accordance with G8's financial policies and procedures.

If you have knowledge of or reasonably suspect that any person has engaged in or attempted to engage in any form of theft, fraud or deceit (**Improper Conduct**), you must immediately notify the G8 Legal Department. Examples of Improper Conduct include, but are not limited to:

- ✘ deliberately submitting false bookings;
- ✘ adding personal bank details to parent refund forms or creating invoices to third parties and using personal bank details for payment;
- ✘ setting up fake team members and submitting wages or providing bank account details that belong to another person;
- ✘ falsifying leave and time and attendance records or providing false employment documentation; and
- ✘ unauthorised removal of equipment, software, supplies or over-ordering for personal purposes.

Related documents: *Fraud Policy*

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