

Code of Conduct

What is the purpose of the Code of Conduct?

G8 Education Limited (**G8**) provides high-quality education and care services across Australia. This is our Code of Conduct (our **Code**) for all G8 team members and it outlines the minimum standards of behaviour which are expected of each team member. We believe these behaviours are essential to providing quality education and care for children. Our Code outlines the minimum standards for all Team Members to follow in all activities related to G8, how we work, how we communicate and our professional conduct.

Who does the Code apply to and when does the Code apply?

Our Code applies to all G8 Education employees (permanent, temporary or casual), contractors, volunteers, board members, or others acting for or on behalf of G8 in any location (collectively **Team Members**) at all times.

Policy statement

It is expected every person who is a part of our team in any capacity will act in accordance with our Code. This means that:

- We understand and behave in accordance with G8's Values and behavioural Competencies (the **G8 Way**)
- We make good decisions - we behave honestly and with integrity, we act with care and diligence in everything we do
- We keep children safe from harm - we foster, promote and contribute to an environment that encourages all children and families to feel safe and secure;
- We treat each other well and keep each other safe - we foster, promote and contribute to a culture that inspires all team members to feel valued, safe and secure;
- We protect our organisational assets
- We ensure the privacy and confidentiality of information
- We avoid conflicts of interest
- We do not engage in bribery or other corrupt practices
- We communicate appropriately
- We use our personal devices at work appropriately
- We ensure financial integrity and responsibility


It is up to every Team Member to make sure we live by this Code. If you have any question or concerns, you should contact your 1Up or 2Up Manager or the People and Culture team.

What is the G8 Way?

At G8 our mission is to be the leading provider of high-quality education and care services. To achieve this mission, we rely on the commitment of every Team Member to operate and act in a manner that aligns with our G8 Values and Behavioural Competencies (the **G8 Way**).

Our G8 Values are:

- **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; and
- **Compassion** - Consistently being respectful, honest, and fair in all that we do.

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Our G8 Values are supported by our Behavioural Competencies. By engaging with our work and behaving in accordance with our Code, we will be putting G8 Values and Behaviours into action every day.

Our Behavioural Competencies are:

- **Own the Outcome** - We work towards challenging goals, passionately striving for the best outcomes for G8 families and teams. We create a safe and team led environment, embedding a culture of accountability and commitment to achieving success;
- **Grow Courageously** - We operate with integrity and behave consistently with clear personal values that align with those of G8. We actively seek opportunities for self-development to support health and well-being, looking for new ideas and experiences. We display courage through owning our decisions and coping effectively with setbacks;
- **Foster Great Partnerships** -We form collaborative relationships internally and externally by engaging, attracting and retaining talent and key partners. We build high performing and effective teams by empowering and developing others, valuing diverse perspectives, and celebrating shared success;
- **Engage & Inspire** - We confidently set direction by inspiring and influencing others to action through passionately communicating a shared purpose aligning to the vision and values of G8. We engage with others through listening and consultation, adapting communication to the needs of different situations;
- **Think Bigger & Better** - We understand the broader strategic objectives of G8 and current sector trends, ensuring a sustainable future for G8 teams and families. We engage in critical thinking and evaluate key information, applying innovation and strategic processes in making high-quality decisions; and
- **Learn, Plan, Do & Embed** - We develop effective plans that follow through to successful outcomes. We prioritise, evaluate, and update plans regularly to meet the needs of G8 teams and families.

How to put our code into practice?

We make good decisions

When making any decision, if doing the right thing is not clear, every Team Member must ask themselves the following questions:


- Is this decision consistent with this Code and G8 Policies and Procedures?
- Is this decision legal and ethical?
- 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”, we need to stop and get advice or ask questions. Team Members, who in good faith seek advice, raise concerns or report actual or potential breaches of our Code are doing the right thing, and must not face any adverse consequence for doing so.

We keep children safe from harm

We are all 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.

Each Team Member is 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. As such G8 have created our Child Protection Statement of Commitment, which has been designed to complement this code. As such this Code of Conduct must be read in conjunction with the Child Protection Statement of Commitment.

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We treat each other well and keep each other safe

Everyone at G8 Education has a legal, personal, and moral responsibility to work safely and take reasonable care for their own health and safety and consider the health and safety of themselves and others with each decision they make. Each team member is expected to own safety outcomes by identifying and correcting hazards and speak up if they see anyone behaving in an unsafe manner. Everyone is required to foster great partnerships with fellow Team Members, children, families, and other persons and treat everyone with respect and dignity.

Any team member who is found to have contributed to an incident (through their action or inaction) that leads to actual or potential harm to themselves or another person may be subject to disciplinary action.

We ensure we are fit to perform our duties

Every Team Member is expected to present for work fit and able to perform the inherent requirements of their roles and provide quality education and care for children. Where a team member is unfit to perform their role for any reason, or if their Manager reasonably believes that they are unfit to provide care for children they may be requested to leave the workplace in accordance with the Fitness for Work Procedure. A Team Member may be unfit for many reasons including but not limited to: misuse of prescribed drugs, consumption of alcohol or non-prescribed drugs, non-work related injuries or illnesses that affect your capacity to perform the inherent requirements their role.

Every Team Member is strictly prohibited from being under the influence of alcohol or non-prescribed drugs on G8 Premises, when engaging in work duties, or when wearing a G8 Uniform. On limited and approved occasions alcohol may be provided during work-related events. Each Team Member must always use good judgement and never drink excessively or in a manner that could result in a breach of any law or could endanger the health and safety of others.

If any Team Member breaches any part of this Code, any other G8 Policy or Procedure, or engages in any form of misconduct whilst unfit for work, that Team Member will be treated as fully responsible for their conduct regardless of such influence. If a Leader has reasonable suspicion to believe that a team member is under the influence of drugs and/or alcohol, the team member may be requested to undergo drug and/or alcohol screening.


We protect our organisational assets

G8 and our Team Members have 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. We use these assets in carrying out our work duties, and it is the responsibility of each Team Member to treat these assets with respect and protect them from damage, loss, misuse, and unauthorised access. No G8 asset is permitted to be used by any Team Member for any improper, illegal, or unethical purpose, or improper personal gain.

We ensure privacy and confidentiality of information

During the normal course of our work duties, Team Members may be trusted with personal and confidential documents and information relating to G8, Team Members, children, families, and others.

Each Team Member is prohibited from sharing, discussing, or disclosing any personal or confidential information with any other person, except to the extent such discussion and/or disclosure is required to perform their duties or to comply with a legal requirement. If any Team Member is unsure as to the need to use, disclose or discuss any information or document, that Team Member should not disclose or discuss that information, and should instead seek advice and direction from their Manager. Each Team Member is expected to:

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- keep all of their passwords secure and not share them with others;
- 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
- 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 by Team Members for access to any personal information G8 holds about them are to be made in writing to the G8 Privacy Officer in accordance with G8's Privacy Policy.

We avoid conflicts of interest

All Team Members are expected to avoid any activities which could have the appearance of a conflict of interest with the interests of G8.


All Team Members are required to immediately disclose to their Manager the existence of any actual or potential conflict of interest that could impact or could have the appearance of impacting, the performance of any of that Team Members work duties. Managers should then seek advice from the G8 Legal Department regarding any potential conflict of interest and possible ways to eliminate or mitigate that conflict. Examples of potential conflicts include, but are not limited to:

- **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. This will only be approved if the second job does not interfere or conflict with our responsibilities as part of the G8 team. Where this 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 child, 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 any Team Member has such a relationship with another Team Member or with a supplier to G8, that Team Member must immediately disclose that relationship to their Manager, or if such relationship involves their Manager, to the People and Culture Department. 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 less than \$100. More frequent or expensive gifts should be referred to your 1Up Manager for approval.

We do not engage in bribery or other corrupt practices

We behave honestly, with integrity and comply with all laws and regulations in the conduct of our business. Bribery and other corrupt practices are not only inconsistent with our values, but can also significantly damage our reputation and expose both G8 and our Team Members 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 a in the form of hospitality,

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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. 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 the People and Culture team.

We communicate appropriately

Team Members are expected to foster great partnerships and communicate politely and respectfully with other Team Members, children, families, and suppliers at all times. Team Members will never:

- make any 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 Members, or any child or family;
- create or contribute to any unauthorised platform relating to G8, including but not limited to any Facebook, Instagram or other social media platform page which is not authorised and controlled by G8's Marketing Department or G8's People and Culture Department;
- disclose or upload any media of any kind, including but not limited to documents, images, video or audio recordings, to any platform which is not authorised and controlled by G8, including external social media platforms, without the prior written consent of a senior manager within the G8 Marketing Department;
- respond to media, investor, or other external enquiries relating to G8 without the authorisation of the General Manager Marketing; or
- engage in any other activity which could reasonably be expected to harm the reputation or legitimate commercial interests of G8 and our team.

We use our personal devices at work appropriately

Team Members are expected to only use personal mobile phones and other electronic devices during work hours when the supervision of children is not compromised in any way by such use.

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.

Team Members are strictly prohibited from taking 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 not within the custody and control of G8.


We ensure financial integrity and responsibility

All Team Members are expected to strictly abide by the G8 Securities Trading Policy and follow the guidelines and prohibitions relating to the trading of G8 securities contained in that policy without exception.

Each Team Member has a responsibility to ensure that the financial resources of G8 are used appropriately and prudently, that all financial records relating to G8 are complete and accurate, and that G8 Financial Policies and Procedures are strictly followed at all times.

If any Team Member has knowledge of or reasonably suspects that any Team Member has engaged in trading activity prohibited by the G8 Securities Trading Policy, has engaged or attempted to engage in any form of theft, fraud or deceit (**Improper Conduct**), that Team Member 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;

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- 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.

Responsibilities

Leaders of Self will:

- Own the Outcome by modelling our Code and living our Values.
- Understand and follow relevant laws, regulations and G8 policies and procedures and this Code which governs our operational activities.
- Learn & Embed our code which means we will think before we act. Use good judgment, be honest and ethical in every action we take. Do not breach the Code.
- Foster Great Partnerships with our leaders and colleagues. We will pay close attention to any activity that is inconsistent with our Code, our policies or the law, and Grow Courageously by speaking up and reporting concerns, as soon as possible.

Leaders of Leaders and Leaders of Teams, in addition to the above will:

- Foster Great Partnerships with team members to achieve organisational results in a way that ensures compliance with our Code, and applicable State and Federal laws.
- Seek clarification from your leader or People and Culture to help apply this code and lead the right behaviours.
- Foster great partnerships within and between teams to ensure all team members know that we expect them to always do what is morally and legally right.
- Engage & Inspire your team to behave in line with this code and respond appropriately if you become aware of any breaches of this code.

Leaders of Organisation, in addition to the above will:

- Administer our Code in an independent, objective, and consistent manner.
- Engage & Inspire the organisation to behave in line with this code.

The People and Culture Team will:


- The Chief People and Transformation Officer may in consultation with the Executive Leadership Team vary the conditions and application of this policy.
- The people and culture team will review this Code regularly in accordance with G8's Quality Improvement Framework.
- Maintain and manage this Code.
- Provide advice and support in any instance where a potential breach of the Child Protection Code interacts with this Code.

Breach of Code

Compliance with this Code is mandatory for all Team Members. If you know of or suspect any breaches of this Code you should contact your 1Up or 2Up Manager or the People and Culture team. Our [Whistleblower Policy](#) also provides further information on how we will support Team Members who may wish to raise issues anonymously.

All allegations of breaches of this code will be investigated in a fair and just manner, in accordance with our [Managing Complaints and Grievances Procedure](#). Engagement in prohibited behaviours may result in disciplinary action, up to and including termination of employment and or commencement of legal proceedings for serious breaches.

The Executive Leadership Team must report material breaches of this Code to G8's Board.

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Review

The Board will review this code on an annual basis and periodically when any changes are made to G8's strategy to ensure that the code is operating effectively and that it remains consistent with the G8's core values.

Supporting Documents

The following procedures have been designed to operationalise the standards contained in this Code and establish G8's direction and support for all Team Members.

- Managing Underperformance Framework
 - Child Safety Reporting Standard
 - Managing Grievances & Complaints
 - Managing Conflicts of Interest
 - Managing Fitness for work (Launching 2021)
 - Managing Learning and Development (includes PDR & Succession) (Launching 2021)
 - Information Security Management System (ISMS) Procedure Manual
- Other supporting materials include
- Employee Assistance Program, EAP
 - Australian Children's Education & Care Quality Authority (ACECQA)
 - United Nations Convention on the Rights of the Child
 - National Quality Standard
- Related Policies
- Child Safety Policy
 - [Whistle-blower Policy](#)
 - Child Protection Statement of Commitment
 - Incident notification and investigation policy
 - [Team Inclusion and Belonging Policy](#)
 - Team Member Support and Management Policy
 - [Workplace Health and Safety Policy](#)
 - Securities Trading Policy
 - [Information and Communication Systems Policy](#)
- Related Legislation
- Corporations Act 2001
 - Children (Education and Care Services) National Law
 - National Quality Framework
 - Fair work Act 2009
 - Fair Work Regulations 2009
 - The Privacy Act 1988
 - Children Services Award 2010
 - Educational Service (Teachers) Award 2010
 - Work Health and Safety Legislation
 - Work Health and Safety Act 2011 (ACT)
 - Work Health and Safety Regulation 2011 (ACT)
 - Work Health and Safety Act 2011 (NSW)
 - Work Health and Safety Regulation 2017 (NSW)
 - Work Health and Safety Act 2011 (QLD)
 - Work Health and Safety Regulation 2011 (QLD)
 - Work Health and Safety Act 2012 (SA)
 - Work Health and Safety Regulations 2012 (SA)
 - Occupational Health and Safety Act 2004 (Vic)
 - Occupational Health and Safety Regulations 2017 (Vic)
 - Occupational Safety and Health Act 1984 (WA)
 - Occupational Safety and Health Regulations 1996 (WA)

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