

PART A: OVERVIEW OF CODE

This Code sets out Nationwide Corporate Service's (Nationwide) expectations of staff and contractors with respect to their professional and personal conduct. It is intended to promote integrity and ethical behaviour, and to guide individuals' dealings with colleagues, clients, relevant stakeholders, and the communities in which we work. This Code stands beside, but does not exclude or replace other legally binding obligations.

The Code has broad application. It applies to all staff and contractors of Nationwide, regardless of their level or seniority. It covers all circumstances when staff and contractors are performing work, duties or functions for Nationwide, as well as related activities, such as work-related functions, travel, conferences and any circumstances when a person is representing the Nationwide in any capacity.

The Aim of Our Code of Conduct is to:

- (a) Encourage greater transparency and accountabilities in an organisation.
- (b) Provide a guide for the basis of organisational expectations for members and contributors.
- (c) Encourage commitment to ethical and fair behaviour from members of an organisation and assist in upholding organisational values and attitudes.
- (d) Consistency in determining what is and what isn't acceptable behaviour.

Primary Obligations

The overarching obligation of all staff and contractors is to act in the best interests of Nationwide at all times. To this end, staff and Contractors have three (3) primary obligations with respect to their personal and professional conduct:

1 The obligation to Nationwide in terms of responsible stewardship of its resources and protection of its reputation in the wider community.

A duty to observe standards of equity and respect in dealing with every member of the Nationwide community.

2

3 An obligation to act appropriately when a conflict of interest arises between a staff member or contractor's self-interest and their duty to Nationwide.

NATIONWIDE RESOURCES AND REPUTATION

1

Professional Standards

Nationwide at all times holds itself to the highest professional standards and delivers services and systems that are designed to promote the public's best interest.

Public Comment

Staff and contractors must not make any public comment on behalf of Nationwide or represent themselves as being spokespersons for the company, unless expressly authorised to do so.

All public comments of this nature should be coordinated by the appropriate Manager within Nationwide's Executive Management team.

These expectations are not intended to restrict the right of any individual to freely express their opinions in their private capacity, or as a member or representative of any professional, community or representative body.

Advertising and Marketing

Nationwide will at all times consider the content and appropriateness of any marketing material (including social media posts) to ensure the marketing material and content meets community standards.

Nationwide will also consider the impact of certain material and Aboriginal and Torres Strait Islander peoples, inclusive of the use of imagery of deceased persons.

Responsible Stewardship of Nationwide Resources

Staff and contractors are required to:

- Use Nationwide resources for Nationwide purposes only. (Reasonable personal use of some resources may be permitted provided it is not excessive and it does not interfere with the performance of Nationwide functions;
- Use Nationwide resources in a timely, proper and efficient manner;
- Care for and maintain Nationwide resources within their possession or control;
- Avoid improper use of Nationwide resources for private gain or the gain of a third party; and
- Use information and community technology devices for business purposes in accordance with the appropriate Nationwide Policy.

Intellectual Property

Staff and contractors are required to deal with intellectual property in accordance with the relevant Nationwide's Policy or Procedure.

Ethical Decision Making

When making decisions related to Nationwide or work matters, staff and contractors are required to consider:

- Whether the decision complies with Nationwide's legal obligations;
- Whether there are any conflicts of interest arising from the decision; and
- The possible impact of the decision on others and on the reputation of Nationwide.

Fraud and Corruption Prevention

Staff and contractors are required to:

- Minimise Nationwide's exposure to fraud and corruption, by abiding the with the relevant Nationwide's Policy or Procedure;
- Report any suspected fraud,
- Corrupt, criminal, unethical conduct, maladministration or waste of public money. Individuals can report directly;
- To their manager/supervisor (for staff) or Nationwide contact person (for contractors);
- Alternatively, such reports may be made as a "public interest disclosure" in accordance with the relevant Nationwide's Policy or Procedure and as detailed further below.

Public Interest Disclosure

Staff and contractors can report any suspected fraud, corrupt, criminal or unethical conduct, maladministration or serious and substantial waste of public money as a Public Interest Disclosure under with the relevant Nationwide's Policy or Procedures.

Disclosures should be made to a Nationwide Executive Manager.

Staff and other public officials making public interest disclosures are protected from victimisation under the Relevant Public Interest Disclosures Acts or Whistleblower Acts within the relevant state or territory.

DUTY TO OBSERVE STANDARDS

2

Equity and Respectful Treatment

Equity, diversity and inclusion is considered essential to Nationwide's continued success. Nationwide values diversity of thought and experience and believes that an equitable, inclusive and collaborative culture underpins everything we do.

Staff and contractors are required to:

- Treat staff and contractors with respect;
- Ensure they do not engage in unlawful discrimination, harassment and/or sexual harassment;
- Not allow personal relationships to affect professional relationships;
- Ensure they do not engage in workplace bullying;
- Act and communicate professionally and courteously with all, staff and contractors;
- Give due credit to the contributions of other staff and contractors;
- Refrain from acting in any way that would unfairly harm the reputation and career prospects of other staff or contractors; and
- Consider the desirability of intervening constructively where a colleague's behaviour is clearly in breach of this Code.

Health and Safety

Staff and contractors are required to:

- Take reasonable care for the health safety and welfare of themselves, and others in the Nationwide community. Nationwide has a Health and Safety Policy and Procedures which set out these obligations in more detail;
- Ensure they do not attend work or perform duties or functions for Nationwide while under the influence of alcohol or drugs. Nationwide has Drug and Alcohol Guidelines which set out these obligations in more detail; and
- Cooperate with Nationwide management to ensure compliance with all relevant health and safety laws.

Privacy

Staff and contractors are required to:

- Respect individuals' rights to privacy and maintain the privacy and confidentiality of information.
- Take reasonable precautions to prevent unauthorised use or disclosure of confidential or personal information; and
- Keep records in accordance with relevant legislation.

CONFLICT OF INTEREST

Conflicts of Interest

Staff and contractors are required to:

- Identify any actual, potential or perceived conflict of interest between their personal interests or duties to other parties, and their duties and obligations to Nationwide, and deal with such conflicts of interest in accordance with Nationwide's Conflict of Interest Policy;
- Promptly make full disclosure to Nationwide's Executive management team of all the relevant facts and circumstances giving rise to an actual, potential or perceived conflict of interest, and complete a Disclosure Statement if required.
- Managers/supervisors have additional responsibilities to take appropriate action when employees make disclosures, in accordance with Nationwide's Conflict of Interest Policy.

In addition, directors and senior managers of Nationwide are required to declare interests and activities that may be prejudicial to Nationwide's Code of Conduct.

Professional, Technical and Other Staff

Nationwide expects that professional and technical staff will not generally perform outside work. However, Nationwide recognises that there may be some circumstances when professional and technical staff may perform outside work.

Such outside work is only permitted if it has been disclosed in advance to the Executive Management and it:

- Does not compromise the staff member's integrity and independence;
- Does not conflict with their Nationwide work or adversely affect their Nationwide work performance; and
- Does not involve Nationwide time or resources.

Gifts and Benefits

Staff and must not accept or confer gifts or benefits unless they have been approved by the Executive Management team

Operation of this Code

4

Compliance with this Code

All staff and contractors are required to comply with this Code. For the purposes of this Code:

- **Staff** means all employees of Nationwide, including casual employees; and
- **Contractor** means conjoint and visiting appointees; consultants and contractors; agency staff; and
- Any other person appointed or engaged by the Nationwide to perform duties or functions for the Nationwide.

If a staff member breaches this Code, Nationwide may take disciplinary action.

In serious cases, this may include termination of employment.

The process for dealing with alleged breaches of this Code by staff will be in accordance with the applicable, industrial instrument or contract.

Seeking guidance from Nationwide contact people

This Code sets out the obligations of staff and contractors. It is not possible, however, to cover every circumstance and situation in this Code. If a circumstance or situation arises which is not expressly covered in this Code, individuals must apply the principles of this Code and not act in conflict with the Code.

If an individual is unsure about their obligations in any circumstance or situation, they should seek guidance prior to taking any action, from the following contact persons:

- **Staff** should contact their manager/supervisor.
- **Contractors** should contact the Nationwide contact person designated under their contract or appointment letter.

In addition, all staff and contractors can contact any Member of the executive management team, the CEO, People and Culture or the Nationwide Director.

Staff and contractors can also report any suspected breaches of this Code, or other ethical issues, to State Based whistleblower hotlines such as ICAC and IBAC.