

Code of Conduct



A message from the CEO

Dear Colleagues

Link Wentworth's Code of Conduct

Link Wentworth is one of the largest community housing providers in Australia, managing over 6,400 homes with around 10,000 residents and over 200 amazing staff. Link Wentworth is committed to providing more homes and delivering better services to enable a brighter future for people facing housing stress and homelessness. This Code of Conduct is intended to guide the behaviour and expectations of our organisation.

Link Wentworth is entrusted by the government, the community, and its tenants to manage its services and assets efficiently, fairly, impartially and with integrity. We hold an important position in the community that requires transparency, honesty, respect, and fairness for all people we support and serve.

As a Public Benevolent Institution (non-profit) community housing provider, we make decisions each day that affect the lives of others. In everything we do, we are expected to act and be seen to act in the interest of those we are here to serve.

The behaviours set out in this Code of Conduct are fundamental to building the culture required to deliver Link Wentworth's client and business outcomes, enhance its reputation, and ensure Link Wentworth continues to be a great place to work.

Andrew McAnulty

Chief Executive Officer

February 2023



About the Code

This Code of Conduct outlines the responsibilities and standards of ethical and professional behaviour and practice expected of you and all of 'our people' in the course of performing duties in the 'workplace'. The Code outlines the way we do business and drives how we work and put into practice our values, make ethical decisions, deliver services, and interact with each other.

The Code cannot and does not address all the possible behaviours or ethical scenarios that you may encounter, and is to be read in conjunction with legislation, regulations, and Link Wentworth's policies and procedures. However, the ethical decision-making model (attached to this Code) can be applied to assist you in making appropriate decisions. Guidance can also be sought from management or People & Culture.

Important terms used within this Code are defined below:

- 'Our people' refers to permanent, temporary and casual employees; employment agency contractors; volunteers, interns, and work placement students; and Link Wentworth's Board of Directors
- 'Workplace' refers to an office or any alternative location where work is carried out or where a
 person is directly or indirectly, intentionally or unintentionally, seen as a representative of Link
 Wentworth
- 'Client' refers to a tenant, prospective tenant, housing applicant, or occupant of a property managed by Link Wentworth, an individual to whom Link Wentworth provides homelessness support services, or an individual who seeks to access any of Link Wentworth's services

The Code is embedded through a combination of training, performance plans, and continual reinforcement of the principles and values contained within it. Our people are encouraged to discuss the Code with each other and refer to it when making important decisions. Active and open discussion of ethical dilemmas and conflicts of interest helps to foster a healthy and professional organisational culture and one that can withstand the highest scrutiny.

This Code does not form part of your contract of employment/engagement, but you must abide by all the requirements and expectations in the Code because they are lawful and reasonable directions of Link Wentworth. Formal acceptance of the responsibilities set out in the Code is a condition of employment.

The Code will be periodically reviewed as part of Link Wentworth's policy review program.

If there is anything in this Code that you do not understand, please ensure to discuss this with a member of the management team or People & Culture.



Our Purpose

We are committed to creating and improving housing options and services that help people facing housing stress or homelessness. We believe everyone has a right to a safe and secure home where they can grow, connect with community, and build brighter futures that create positive change.

Our Values

Link Wentworth's values underpin our culture, guide our actions and decisions, and determine who and what we aspire to be. We use our values to make decisions that will align with our purpose and vision.

Customer Focus

Our customers are at the heart of everything we do

Compassion

We genuinely care about each other and everyone we work with

Integrity

We are committed to safety, honesty, and accountability

Ambition

We have the courage to lead and help drive positive social change

Respect

We value everyone we engage with and treat them fairly and equitably





Ethical Decision-Making

Ethical decision-making is about deciding when faced with a problem where there is no clear right or wrong answer. While compliance with legal, regulatory, and internal governance frameworks is straight forward, ethical decision-making can be challenging.

Please see the 'Code of Conduct – Ethical Decision-Making Guide' attached to this Code for some examples of ethical problems you may face at work, and how you can make an ethical decision the 'Link Wentworth Way'.

What our people can expect from us

We want to create an environment in which our people:

- Work within a healthy and safe workplace in an environment free from bullying, harassment, and discrimination
- Are treated with respect by their colleagues, clients, and the general public
- Make informed choices and decisions based on sound and ethical decision-making
- Are provided with accurate information and resources in a timely manner
- Have matters heard and responded to within a reasonable timeframe
- Are assigned appropriate tasks for which they are suitably experienced and capable of undertaking
- Have personal information managed in a confidential and sensitive manner
- Receive appropriate direction, supervision, and feedback during their work
- Can report breaches of this Code without fear of intimidation, disadvantage, or reprisal

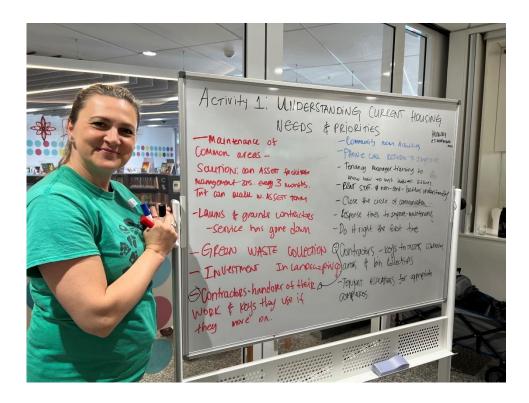


What our clients & communities can expect from us

Link Wentworth is committed to delivering services and interacting with clients, business partners, support providers, and the wider community with respect, integrity, and professionalism.

The people that we interact with can expect that we will:

- Treat them fairly, with respect, dignity, and in a non-discriminatory manner
- Provide friendly and timely service
- Listen carefully with compassion, consult, and engage for best outcomes with our partners, clients, and other stakeholders
- Provide accurate information, conveyed in easy-to-understand terms
- Be accountable and deliver what we promise
- Securely collect, store, use, disclose, and dispose of personal information
- Correct mistakes quickly with integrity and transparency
- Use feedback as an input to improve our services
- Lead and have the courage to shape the future





Our Responsibilities - Our People

You are required to:

- Uphold Link Wentworth's values of Customer Focus, Compassion, Integrity, Respect and Ambition
- Be accountable for your decisions, apply ethical decision-making principles to place the best interests
 of Link Wentworth and its clients over personal interests, and seek guidance to clarify areas of
 uncertainty
- Competently perform your duties in accordance with legal and regulatory obligations, this Code of Conduct, your contract of employment or engagement, position description, Link Wentworth policies and procedures, work directions, and your performance plan and the capability framework (if applicable)
- Work collaboratively with all people and treat them with respect and professionalism
- Take responsibility for your health, safety, and wellbeing, and that of others where practicable
- Actively avoid behaviour that could be interpreted as bullying, harassment, or discrimination, and protect the rights and wellbeing of others by reporting displays of any such behaviour through appropriate channels
- Show compassion for our diverse client base, taking into consideration their individual needs, right to autonomy and dignity, and sovereignty over their own decisions where practicable
- Declare any potential or actual conflict of interest immediately
- Act in a way that enhances Link Wentworth's reputation and refrain from making derogatory comments about your work or other people, or engaging in behaviour which could undermine the integrity or credibility of Link Wentworth
- Responsibly procure, acquire and manage the use of Link Wentworth's money and resources
- Respect the privacy of others and ensure that all personal, confidential, sensitive, and health information is collected, stored, used, disclosed, and disposed of in accordance with relevant legislation and regulations
- Participate in any training necessary to support the performance of your duties
- Embrace continuous improvement opportunities and activities
- Notify Link Wentworth of any change in status to your license, qualification, membership, or probity check that is a condition of your employment
- Report suspected breaches of this Code of Conduct



Our Responsibilities – Our Leaders

As a leader of any level of seniority, with or without direct reports, you lead and set the tone for how business is conducted at Link Wentworth. You are responsible and accountable for leading by example, demonstrating ethical leadership, and modelling the standards of behaviour set out in this Code.

In addition to the responsibilities outlined under 'Our Responsibilities – Our People', you are responsible for ensuring that you:

- Set a good example of ethical behaviour, accountability, and open and honest communication
- Acknowledge and encourage ethical and professional work practices
- Ensure that the systems of work and the work premises and environment are safe and free from inappropriate behaviour such as discrimination, bullying, harassment, fraud, corruption, and any other unlawful or unethical conduct
- Encourage compliance with the Code and ensure its principles are discussed and understood regularly through team meetings, one-on-ones, and during the performance review process
- Take appropriate action on breaches of the Code and report any major breaches to the Chief People
 Culture Officer, Chief Executive Officer, or the Chair of the Board if appropriate
- Treat any breach or potential breach that is identified by you or reported to you seriously and professionally, and manage it as promptly and confidentially as practicable

You are also responsible for ensuring that any direct reports:

- Understand and abide by their obligations under the Code
- Understand and adhere to relevant legislation, policies, procedures, and Link Wentworth's values
- Understand their jobs, how they are expected to do their job, and the results for which they are accountable
- Have equitable access to learning and development opportunities
- Have access to guidance and support where needed to meet their obligations under the Code, legislation, policies, procedures, and values



Our Responsibilities – Our Board of Directors

In addition to the responsibilities outlined under 'Our Responsibilities – Our People', as a Link Wentworth Board Director you are required to:

- Ensure that you fully understand the Code, demonstrate ethical leadership, and model the standards of behaviour set out in it
- Oversee, review, and ensure the integrity and effectiveness of Link Wentworth's compliance systems
- Monitor Link Wentworth's compliance with legal, financial, and ethical obligations
- Actively participate in meetings of the Board and any Board Committees, and be responsible for good corporate governance
- Ensure that Link Wentworth has in place sound WHS, risk management and internal control systems
- Declare any potential or actual conflict of interest at the start of a Board meeting, or as soon as the relevant issue arises, and to not participate in any discussion or decision-making relating to said conflict

Refer to the Link Wentworth Board Governance Framework for more specific obligations, information, and direction.





Our Standards of Behaviour

Professional Conduct

Our people are expected to behave professionally in all situations and with all stakeholders including, but not limited to each other, clients and potential clients, partner agencies and referral services, suppliers, contractors, and other agencies.

Professional conduct is defined as exhibiting a courteous, conscientious, and generally business-like manner, and is demonstrated through verbal language, personal appearance, and the way a person conducts themselves at work including at meetings and external events and training.

Examples of professional behaviour include but are not limited to:

- Using appropriate and respectful language, refraining from offensive language, swearing, or discriminatory slurs
- Attending work free from the influence of alcohol or drugs and not bringing illegal substances to work
- Communicating in a calm, respectful and constructive way, refraining from aggressive, emotional, or humiliating language or gestures
- Dressing in a professional manner (Link Wentworth's dress code is 'business casual', which means
 that your clothing should be appropriate for a business environment, clean, ironed, and properly
 fitted. Examples of inappropriate dress include but are not limited to flip-flops, ripped jeans, activewear, caps, ugg boots. Jeans, shorts, and joggers must not be worn when presenting in person at the
 New South Wales Civil and Administrative Tribunal (NCAT)
- Carrying out all reasonable and lawful instructions
- Ensuring that you arrive on time for work, events, training, and meetings
- Ensuring that you maintain timely and open lines of communication with your team and your manager about your absences or delays from work or meetings
- Ensuring good use of your work time, refraining from time-wasting behaviours or serious delays in decision-making or taking actions
- Using Link Wentworth resources in an appropriate manner, taking active steps to reduce wastefulness and avoid neglect of company equipment or resources
- Ensuring that equipment and resources available to you are used for work purposes and appropriate and reasonable personal use, and not for anything illegal or unauthorised
- Conducting yourself in a way that supports Link Wentworth's good reputation, refraining from any
 activity that could compromise its integrity or credibility
- Taking responsibility for the health, safety, and wellbeing of yourself and others by not coming to work under the influence of drugs or alcohol, and not bringing illicit substances to the workplace.



Upholding our reputation

Our people have a responsibility to uphold the reputation of Link Wentworth by ensuring their behaviour is consistent with Link Wentworth's values and the standards set out in this Code.

You must ensure that you do not, directly or indirectly:

- make a public comment which criticises or reflects poorly on Link Wentworth or any of its clients
- engage in any activity or make any comment which could compromise Link Wentworth's reputation or the reputation of any of its people; or
- release personal or confidential information without the proper authority, where you could be seen as a representative of Link Wentworth by way of implication or connection.

Remember, this can even include comments or activities made outside of work if you can be connected to Link Wentworth (such as through your social media profile linking you as an employee of Link Wentworth).

Public comment

Public comments in any form (including, but not limited to, on social media, on radio or television, or in the press, journals, books or other publications) must only be made in a personal or private capacity and never on behalf of Link Wentworth without the express and prior consent of the Chairperson of the Board, the Chief Executive Officer, or the Chief Communications Officer.

You have a responsibility to behave in a way that does not seriously call into question your ability to act impartially and professionally.

Professional boundaries

You are required to maintain a clear distinction between professional and personal relationships that may exist or develop through association with Link Wentworth, particularly with colleagues and clients.

Boundaries need to be observed to ensure that ethical and professional standards are maintained. For client-facing staff, this is particularly important for the preservation of staff safety. It is important for you to be clear and assertive about the boundaries of your role and what is appropriate behaviour for the professional relationship.

You must not engage in a personal relationship with a client or contractor.



Legal & Regulatory Observance

Link Wentworth undertakes its activities in a highly regulated and legislated environment. You must observe and comply with all applicable legislative and regulatory obligations in all circumstances and must not carry out any illegal activities while undertaking your duties on behalf of Link Wentworth.

It is also your responsibility to remain cognizant of changes in legislative frameworks and regulations which apply to your role to ensure that you continue to meet your obligations.

Licences, qualifications, memberships and probity checks

Where it is a condition of your employment for you to hold a specific license, qualification, membership, or probity check:

- this must be valid, as determined by your manager or People & Culture, for the entire duration of your appointment or for as long as it remains a requirement of your position.
- it is your responsibility to ensure any required license, qualification, membership or probity check remains current.
- you must notify People & Culture as soon as practicable of any change in status to your license, qualification, membership, or probity check to enable its validity to be re-assessed.
- Link Wentworth may decide to withdraw an offer of employment or terminate an existing employment relationship if the results of a probity check or a change in license, qualification or membership warrant or necessitate it.

Refer to the Background Checks Policy and Procedure for more specific obligations, information and direction.

Child Protection – mandatory reporting obligations and alternative reporting pathways

Link Wentworth recognises the importance of considering the safety, welfare, and wellbeing of children and young people that come in contact with our services. If your work involves contact with children or young people, you are required to comply with relevant policies, procedures, and guidelines which apply to such work. This includes meeting your mandatory reporting obligations.

Link Wentworth staff are 'mandatory reporters', which means you are legally required to make a report to the Child Protection Helpline if, during your work, you have reasonable grounds to suspect that a child or young person is at risk of significant harm.

You can refer to the 'Keep Them Safe Mandatory Reporting Guide' or contact the Child Protection Helpline for advice about reporting requirements and related obligations.

Refer to the Child Protection Policy & Procedure for more specific obligations, information and direction.

21 Feb 2023



Work, Health & Safety

Link Wentworth is committed to providing a workplace that promotes and supports the health, safety, and wellbeing of its people. This is a shared responsibility, and at a minimum, every person at Link Wentworth has the responsibility to:

- take steps to keep themselves and others around them in the workplace safe
- ensure that the health and safety of other persons is not put at risk from work carried out by them
- immediately report any hazard or potential hazard to their manager as soon as possible
- report any injury, accident, or near miss to their manager as soon as possible
- ensure that they know who their first aid officers and fire wardens are
- complete induction activities on commencement, including participating in a health and safety induction
- comply with directions issued by management
- use all safety equipment properly at all appropriate times, including personal safety devices, and keep Outlook Calendars up-to-date and detailed as to your locations when out in the field or not working from the office
- request any equipment or training that you need to ensure your health and safety at work.

Refer to the Work Health and Safety Management System for more specific obligations, information and direction.

Bullying, Harassment, and Discrimination

Link Wentworth has a zero tolerance when it comes to discrimination, bullying and harassment.

Bullying, harassment, and discrimination is unlawful and is against the very essence of Link Wentworth's values and will not be tolerated. A safe working environment is based on mutual respect and an expectation that our people will not display or condone behaviour that constitutes bullying, harassment, or discrimination.

Link Wentworth is committed to facilitating a positive work environment characterised by professional, dignified, considerate and respectful conduct – an atmosphere which acknowledges the worth of its people, where every colleague and stakeholder is treated fairly, and where professional views and opinions can be discussed openly and courteously. You are expected to demonstrate tolerance of views held by others and cultures of others which are different from your own.

Equal Opportunity

Link Wentworth genuinely supports equal opportunity for all people, including clients, and is committed to a workplace, business practices, and service delivery which is free from discrimination. Decisions are to be made based on merit and fair evaluation.



Refer to the Equal Opportunity, Discrimination, Harassment & Bullying Prevention Policy for more specific obligations, information and direction.

Fraud & Corruption

Our people are expected to model integrity in all aspects of Link Wentworth's operations. Link Wentworth does not tolerate any activity or behaviour that is fraudulent or corrupt or gives the impression of being fraudulent or corrupt. You must not:

- solicit or accept gifts, bribes, hospitality, benefits, service, or favours in exchange for Link Wentworth services, contracts with Link Wentworth, or any other benefit in relation to your employment or appointment with Link Wentworth, or in exchange for personal gain
- make any intentional false representation, disclosure of information, or concealment of material fact, for your own unfair and unlawful gain
- use computer or other systems to make enquiries about third parties or for any other reason which is not related to your duties
- make claims for reimbursement for expenses where the expense was not warranted or necessary or
 was manufactured for the sole purpose of claiming an expense (for example, making mileage claims
 where a cheaper alternative was available and appropriate, such as a courier)
- advocate on behalf of, or process requests for, or otherwise have dealings with a person with whom you have a conflict of interest such as a contractor or a client.

Everyone has a responsibility to guard against and report instances or potential instances of fraudulent or corrupt activity. Any report of fraudulent or corrupt conduct will be investigated and, if it is considered by Link Wentworth to have occurred, it will constitute grounds for disciplinary action including dismissal.

Refer to the Corrupt Conduct and Fraud Control Plan & the Protected Disclosures (Whistleblower) Policy for more specific obligations, information, and direction.

Gifts and Benefits

The receipt or giving of gifts or benefits is discouraged and to be avoided. However, Link Wentworth recognises that our people may encounter situations where a gift or benefit is offered and is committed to ensuring that it manages such situations in a transparent and ethical manner.

In exceptional circumstances, it may be in Link Wentworth's best interest to accept a gift or benefit where rejection would cause serious offence or be deemed culturally insensitive. In this situation, the item accepted is to be declared and handled according to policy. However, these gifts should not be valued at more than \$50 and the gift should under no circumstances be cash or a cash equivalent (such as an EFTPOS card).

Refer to the Gifts and Benefits Policy for more specific obligations, information and direction.



Procurement & Management of Goods, Services & Finances

When procuring goods, services and/or finances for Link Wentworth, you must:

- only make purchases or enter into agreements where you have the delegated authority to do so
- ensure that you are responsible with the organisation's money and ensure good value for money
- not engage an external contractor with whom you have a personal relationship and/or conflict of interest
- ensure that you follow any relevant policies and procedures related to the incurring and reimbursement of expenses.

Refer to the Delegations Manual and the Conflict-of-Interest Policy for more specific obligations, information and direction.

Use of Company Resources & Facilities

You must be careful and mindful when using resources, assets and equipment provided by Link Wentworth. Resources, assets, and equipment include but are not limited to:

- documents
- information and computer technology equipment (such as computers, laptops and accessories)
- mobile phones or other devices
- credit cards
- banking tokens
- motor vehicles
- fuel cards
- keys and access cards
- identification tags
- safety devices and personal protective equipment



Reasonable and limited use of Link Wentworth property for personal purposes is acceptable (during unpaid hours such as before or after work or during breaks), however this must not be abused or impinge on:

- the operations of the business
- your ability to complete your work; or
- impact the organisation financially through time or resource wastage.

Link Wentworth resources must not be used for secondary employment or personal businesses, gambling, or for pornographic, racist, or other illegal purposes.

Company cards such as credit cards, opal cards and cab-charge cards must only be used for Link Wentworth business-related reasons.

The Credit Card Usage Policy provides clear guidance on what Link Wentworth corporate credit cards can be used for, who can use the cards and what cards must not be used for. You must have delegated authority to incur the expenditure before the card is utilised.

You must also ensure that your use of any resources, assets, or equipment is in accordance with and does not breach other Link Wentworth policies, or damage or put at risk the reputation of Link Wentworth or any of its people or stakeholders.

All items are to be cared for and used in accordance with directions provided to you and common sense. At the end of your employment or engagement, you must return all items issued to you during your tenure at Link Wentworth.

Refer to the Credit Card Usage Policy (732) and ICT Equipment Policy for more specific obligations, information and direction.

Conflict of Interest

A conflict of interest occurs where an individual's private interests have interfered, or have the potential to interfere, with their ability to perform their duties impartially and ethically.

A conflict of interest may include, but is not limited to:

- acceptance or giving of gifts, bribes, or benefits for services performed in the course of employment
- inappropriate use or sharing of personal, sensitive, or confidential information
- a personal or commercial relationship with another party which has dealings with Link Wentworth, or may have dealings with Link Wentworth; or
- external roles or activity or membership.

Link Wentworth has a commitment to open, transparent, and ethical decision-making practices.

You must actively avoid any actual, perceived or potential conflict of interest and must disclose any conflict immediately and in **advance** if possible.



Link Wentworth records and keeps a register of declared conflicts of interest and commits to taking steps to manage and respond to any actual or alleged conflict of interest.

External Roles and Secondary Employment

All supplementary employment or paid or unpaid engagements (e.g. volunteer roles, Board positions, contractor engagements) together referred to as 'external roles' proposed to be undertaken by you whilst working at Link Wentworth must be:

- declared by you at the time of commencing employment with Link Wentworth or, if already employed by Link Wentworth
- declared by you and subsequently approved by Legal & Risk in conjunction with People & Culture prior to commencement of an external role.

External roles may pose a potential conflict of interest and must therefore be assessed and managed accordingly.

In considering a request to undertake an external role, Link Wentworth will consider matters such as:

- work health and safety
- conflict of interest
- potential impact on your performance and ability to meet your obligations efficiently and effectively to Link Wentworth; and
- your ability to remain impartial.

Link Wentworth may review or withdraw any prior approval to undertake an external role should it become apparent that it is affecting your performance, poses a risk to work health and safety, or is against Link Wentworth's business.

Link Wentworth Directors must declare to the Board or People & Culture Committee, interests in corporations, partnerships or other business which may be relevant to the activities of the Board.

Refer to the Conflict-of-Interest Policy for more specific obligations, information and direction.



Corporate Information

Privacy

All personal information, including sensitive and health information, is to be collected, stored, used, disclosed, and disposed of in accordance with the *Privacy Act* 1988, Australian Privacy Principles, and the *Health Records and Information Privacy Act* 2002 (NSW).

Your responsibilities under this legislation are significant, and so it is important that you ensure that all information is handled and used for its intended and lawful purpose and stored appropriately in a safe location.

Confidential Information

You have a responsibility to preserve the confidentiality of confidential information. You must ensure that you do not disclose Link Wentworth information or documents acquired through your position, except as necessary to undertake your duties or where required by law to disclose. This obligation extends even after your relationship with Link Wentworth ends.

Information which Link Wentworth has not released to the public should be considered confidential. If in doubt, do not disclose.

Prior to disclosing any confidential information or documents to a third party, you should consult with the Legal & Risk team and then obtain approval from a relevant member of the Executive Leadership Team or the Chief Executive Officer.

You must immediately notify a member of the Executive Leadership Team or the Chief Executive Officer of any suspected or actual unauthorised use, copying, or disclosure of confidential information by an individual.

Records Management

You have a responsibility to keep full and accurate records of Link Wentworth's business activities, including records relating to employment, tenants, and tenant applications. Our records are our corporate memory and provide evidence that we have followed proper procedures and the law in carrying out our work.

Record keeping and electronic and paper-based filing should be kept up to date and stored appropriately and securely as part of good business practice, and to also safeguard our privacy and confidentiality obligations.

Refer to the Privacy Policy for more specific obligations, information and direction.



Breaches of the Code

This Code sets out several expectations and standards that, if breached, may result in action being taken by Link Wentworth including formal disciplinary action. In the case of a serious breach or repeated breaches, the action taken may include termination of employment and/or legal action.

If you report a suspected breach of the Code, you should feel confident that you can do so without fear of reprisal or being subject to disadvantage, bullying, harassment, or intimidation. Your identity will be protected to the extent that it is reasonable or required by law. Link Wentworth will determine if an investigation into the breach is required.

Where there is strong evidence that a malicious or vexatious report has been made, disciplinary action may be taken against the person making the report.

Refer to the Protected Disclosures (Whistleblower) Policy for specific obligations, information and direction.

Your Acknowledgement

By signing, I affirm that I have been given a copy of the Code of Conduct, I have read it, and I have had the opportunity to clarify any areas of uncertainty. By signing, I also agree to abide by my obligations set out in the Code.

Name	Signature	
Date		