



OCEANIA

Believe in Better

Code of values and conduct

1. What is the Code of Values and Conduct for?

The Code of Values and Conduct is designed to set the standards for how we work at Oceania Healthcare.

The Code of Values and Conduct is supported by other related policies and procedures which can be found on the intranet, or by speaking with your manager.

Oceania Healthcare takes this Code and all supporting policies seriously. As a director or employee of Oceania Healthcare, you must comply with the principles set out in this Code.

2. Code of Values and Conduct Guiding Principles

Oceania's values are:

- **We're one team:** Across teams and functions we collaborate to deliver the best outcomes. Together we're stronger than any individual effort.
- **We're finding better ways:** We believe there's always a better way. We look beyond the obvious, find creative solutions, and deliver results that make a real difference.
- **We're committed to care:** We put safety and care at the centre of everything we do. We notice and act to create environments where everyone feels looked after.
- **We're proud to deliver:** Every task, every day matters. We follow through on our commitments because our residents and families count on us to get it right.

The guiding principles of this Code are:

- Acting with honesty and integrity
- Respecting the rights of others
- Avoiding conflicts of interest
- Maintaining professional conduct at all times

3. Who does this apply to?

This Code applies to everyone who works for or represents Oceania Healthcare. This includes all directors, employees, contractors, and consultants. All Oceania Healthcare personnel are required to sign the Code of Values and Conduct acknowledgement.

4. When does the Code apply?

Whenever you are a representative of Oceania Healthcare. This may include times out of your usual working hours or locations, such as functions, or when you are meeting with the community.

5. What do I need to do?

You are expected to comply with this code, relevant laws, and Oceania Healthcare policies, processes, procedures.

You are expected to complete all required training to maintain and/or build your awareness of this code, the law, and Oceania Healthcare standards.

6. How can I be sure I'm abiding by the Code?

It is expected that you understand the guiding principles, and act with Oceania Healthcare's best interests in mind at all times.

7. Who can help me abide by the Code?

Your manager is your first point of call. If your manager is unable to assist, the People & Culture team are available to help.

8. How does Oceania Healthcare make sure the Code is effective?

All employees and directors are expected to familiarise themselves with the Code. The Board of Directors of Oceania Healthcare are responsible for the Code, and the People & Culture Team are responsible for communicating and implementing any changes to the Code.

Oceania values

No matter where you work or what you do, you are expected to live Oceania Healthcare's values and speak up if you believe they are being compromised. Oceania's values are:

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Elements of the code of values and conduct

1. Personal activities

- 1.1. You need to ensure that personal activities or interests (including participation in political matters) do not conflict, and are not seen by others to conflict, with the aims or objectives of Oceania Healthcare and the care of residents. If your beliefs on an issue are incompatible with the views of Oceania Healthcare you should discuss this with your Manager.
- 1.2. Refusing a lawful and reasonable instruction may be grounds for dismissal.
- 1.3. As an employee, you have a responsibility to provide honest, impartial and sound advice to Oceania Healthcare. This means that you are not to withhold relevant information, seek to obstruct or delay a decision, or attempt to undermine or improperly influence.

2. Honesty

- 2.1. Oceania Healthcare requires employees and directors to act with the utmost honesty. Through their position within Oceania Healthcare employees will have access to information, systems, goods and documents belonging to Oceania Healthcare and its residents. Stealing, misappropriating or converting these items to private use and / or using knowledge gained through unauthorised access to information are criminal actions. Any such offence is likely to result in dismissal as well as formal notification to the Police.
- 2.2. Concealing errors and omissions, or attempting to protect fellow employees or directors who have breached the law, NZ Nursing Council standards or Oceania Healthcare's procedures will also be viewed very seriously. If employees become aware that any other employee has been involved in any activity they consider suspicious or in breach of the Code of Values and Conduct, they are required to bring this to the immediate attention of their Manager.

3. Personal conduct

- 3.1. At all times the actions of employees and directors, both inside and outside the workplace, should be beyond reproach. Employees and directors should avoid any activities, whether connected with their official duties or outside of work, which might bring Oceania Healthcare into disrepute, or jeopardize its relationships with residents, their families and the general public. 1 For the purposes of this Code, the "Manager" of the CEO or a director is the Chairperson of the Board, and the "Manager" of the Chairperson of the Board is the Chairperson of the Audit Committee.
- 3.2. Refusing to perform a reasonable request, sleeping during working hours, acting in a manner which results in injury/bodily harm to another person or using offensive or obscene language to a resident, colleague or visitor are all examples (but not an exhaustive list) of unacceptable conduct. Depending on the nature and severity of the offence, disciplinary action resulting in a formal warning, or in some cases dismissal, may occur.

3.3. Only the Chair of the Board of Directors or the Chief Executive Officer may communicate with the media on behalf of Oceania Healthcare, unless otherwise expressly authorised by the Chair or the Chief Executive Officer. The Chair of the Board of Directors or the Chief Executive Office may delegate this authority from time to time to the Corporate Communication function under guidance.

4. Criminal offences

4.1. If an employee or Director of Oceania Healthcare is charged with a criminal offence during their employment with Oceania Healthcare, it is their responsibility to inform their Manager of the charge(s). This applies regardless of whether the offence is related to Oceania Healthcare. The decision of the court is to be advised together with conviction details, if applicable. Failure to report a criminal offence may result in disciplinary action. If a criminal offence is committed while at work, disciplinary action will be taken separately from the criminal process.

5. Respect for the rights of others

5.1. In performing their duties, employees and directors must respect the rights of their colleagues, our residents and the public. This means that you are expected to:

- a. Avoid behaviour that might distress other employees or disrupt the workplace.
- b. Make sure that any workplace relationships do not have a negative effect on your work performance.
- c. Respect the privacy of individuals when dealing with personal information.
- d. Not harass or discriminate against your colleagues, or the public, on the basis of their gender, age, sexual orientation, disability, marital status, and ethnicity, religious or ethical beliefs.
- e. Not bring into the workplace any material that may be viewed as racist or sexist, that is pornographic, or that is otherwise offensive.

6. Avoidance of conflicts of interest or integrity

6.1. You are expected to be honest, fair and impartial when you perform your duties. This means that:

- a. You are not to approve anything that will result in a financial gain to yourself (e.g. increased salary, travel expenses, a training course, your own overtime).
- b. You are not to lend money to, or borrow money, or otherwise enter into financial relationships with staff, residents or suppliers.
- c. You must inform Oceania Healthcare if you are involved in, or have a personal or financial interest or commitment to, any activity that may conflict, or could be seen by others to conflict, with the performance of your duties at Oceania Healthcare.
- d. You should not show bias to an individual or organisation.
- e. If you are an employee, you must ask your manager before taking up other paid employment, where that other paid employment could conflict with the performance of your duties.

7. Gifts and rewards

7.1. You may not seek any form of reward (including gifts, favours, prizes or fees) for performing your duties as an employee or director. Gifts or rewards may be seen as bribes or inducements that put you under an obligation to someone other than Oceania Healthcare. If you are offered any form of reward or gift you should inform your Manager who will decide the right response.

BREACHING THE CODE OF VALUES AND CONDUCT

The elements of the Code of Values and Conduct are by no means exhaustive. A relationship based on trust and confidence between Oceania Healthcare and its employees cannot be underestimated.

All suspected breaches of the Code of Values and Conduct, or any other situations pertaining to the relationship of trust between Oceania Healthcare and its employees and directors will be thoroughly investigated. If these investigations reveal breaches of the Code of Values and Conduct by an employee, a formal disciplinary investigation will be undertaken.

If there is a breach of the Code of Values and Conduct by a director, an investigation will be undertaken by the Chairperson of the Audit Committee or an independent expert.

CODE OF VALUES AND CONDUCT COMMITMENT

(Oceania Healthcare copy)

Signatures of confirmation:

I am committed to, and agree to abide by, the Code of Values and Conduct

Suzanne Dvorak, Chief Executive Officer

I have read, understood and agree to abide by the Code of Values and Conduct

Employee Signature

Name

Date