



# Code of Conduct - Board Policy

## 1. Purpose

Diabetes Australia (DA) is committed to creating a workplace that is diverse, inclusive, and supportive, where every individual can thrive and contribute their best work. This document describes the standard of behaviour expected from our workforce and reinforces the role each person plays in shaping a positive and respectful workplace culture.

It provides guidance on ethical and professional conduct that align with DA's values. When faced with situations not explicitly covered by this document you should consider:

- Does the conduct align with this Code and other policies?
- Does it demonstrate compassion and respect for others?
- Is this action lawful and ethically sound?
- Would I feel confident if this decision were made public?
- Could this choice harm others or undermine trust?

If you are unsure, ask your Leader or a member of the People and Culture (P&C) team for advice.

## 2. Scope

This code of conduct applies to DA's workforce while performing duties or engaging in activities connected to DA, this includes:

- The DA Board
- All employees of DA, whether permanent, casual, full-time, part-time or trainees
- Volunteers and work experience placements
- Labour Hire Workers
- Entities or persons providing goods and services to DA (including contractors and subcontractors).

It extends to situations that happen outside the workplace or standard work hours, such as:

- Work related travel (e.g., overnight stays away from the workplace for official business).
- Attendance at work-related events, including but not limited to training, educational and social events authorised by DA.
- Online activity, including social media use and public commentary, whether in an official capacity or privately.
- Any conduct outside the workplace that could negatively impact DA's reputation, even when on leave or not actively working but still employed.

Employees must comply with all DA policies including this one, however it does not form part of any employee's contract of employment, nor does it form part of any legal agreement with other members of the workforce.

### 3. Organisational Values

Our Values are:

- **Compassionate** - Empathy in action, always!
- **Committed** - I work hard to make a meaningful difference for people internally and those living with diabetes.
- **Accountable** - I follow through and do what I say I will, others can count on me.
- **Authentic** - I show care, empathy, transparency and vulnerability so people feel safe to be themselves around me.
- **Collaborative** - I promote mutual respect and collective success by sharing knowledge and resources.

### 4. Responsibilities

#### DA's Board

Board members are expected to model and promote the standards in this Code through their decisions, conduct, and interactions, and to act in a way that reinforces DA's values and desired culture.

#### DA's Workforce

Our people are responsible for familiarising themselves with this Code and consistently showing the expected standard of conduct.

#### Leaders

Must model and promote the conduct standards in this document. They must ensure their people understand their ethical responsibilities, including those detailed in the Code and any relevant legislation, delegations, policies, or other information required to perform their duties effectively.

Leaders are expected to engage with their people to discuss issues, clarify expectations, and provide guidance when needed. They have an obligation to make fair and transparent decisions when addressing any allegations of conduct that do not uphold this Code.

### 5. Behavioural Standards

Our workforce are expected to always demonstrate the following behavioural standards:

- Act consistently with DA's Values.
- Comply with all obligations under DA's policies, procedures, guidelines, professional standards and relevant legislation.
- Follow all lawful and reasonable directions.

- Treat all people with dignity, respect and empathy.
- Respond to the needs and concerns of colleagues and other relevant stakeholders with patience, understanding and compassion.
- Communicate honestly, transparently and respectfully, even when conversations are challenging.
- Engage in robust and respectful conversations including giving and receiving constructive feedback, raising concerns early, challenging ideas rather than people, and focusing on facts and solutions
- Be accountable for performance and behaviour by meeting agreed expectations, seeking clarification when needed, acting on feedback,
- Work constructively with others, valuing diverse contributions and viewpoints.
- Share information, knowledge and resources to support collective success.
- Act in the best interests of DA and the people we serve.
- Demonstrate diligence, effort and a strong work ethic in all tasks.
- Apply knowledge, skill and judgement to the best of one's ability when performing official duties.
- Give priority to official duties during working hours and keep personal activities to a minimum.
- Take responsibility for actions, decisions and commitments, and follow through on agreed tasks.
- Use organisational resources responsibly, efficiently and for authorised purposes only.
- Only collect, use and disclose DA information in accordance with legal, ethical obligation
- Make all reasonable efforts to provide high-quality service to internal and external stakeholders, exercising due care at all times.
- Contribute to a psychologically safe workplace by inviting input, listening without defensiveness, and raising concerns or mistakes early so that risks can be addressed and learning can occur.
- Meet all workplace health, safety and wellbeing obligations, and take reasonable care for the safety of oneself and others.
- Report any behaviour that may breach the Code, DA's policies and procedures, guidelines or legislative obligations.

## 6. Reputation

DA's reputation is shaped by the conduct and professionalism of its workforce. Every interaction, whether in person, online, or in the community, affects the perception of DA. Our workforce are expected to uphold high standards of behaviour and ensure their actions support a respectful, trustworthy and responsible workplace.

Our workforce must:

- Conduct themselves in a manner that reflects positively on DA.
- Avoid behaviour, including online activity, that could damage the DA's credibility or relationships.
- Communicate thoughtfully and professionally in all interactions.

- Only make public statements on behalf of DA if authorised and not imply (directly or indirectly) that they are speaking on behalf of DA unless explicitly authorised to do so.

#### Public Comments and Media Enquiries

Our workforce are only allowed to make public comments about DA if they are authorised as a spokesperson by the CEO and have written approval from the Group Executive, External Affairs.

This applies to any verbal or written comment that:

- Identifies the individual as a DA worker or
- Suggests, directly or indirectly, that the individual is expressing DA's organisational position.

#### Online Conduct

Our workforce must ensure their online behaviour upholds community trust and reflects the professionalism of the organisation. This includes:

- Acting respectfully and responsibly in online interactions.
- Avoiding conduct that could harm DA's reputation or relationships.
- Exercising good judgement and discretion when posting or commenting online.

Employees and Workplace Participants must not imply, directly or indirectly, that they are speaking on behalf of the organisation unless explicitly authorised to do so.

#### Professional Use of Social Media

Those who manage or contribute to official DA social media channels must:

- Protect the privacy of consumers and colleagues by complying with the Privacy Policy and Australian Privacy Principles, including obtaining written consent before posting any images or information.
- Ensure all content is accurate, appropriate, reliable, and aligned with organisational expectations.
- Respect intellectual property rights by using only content for which the organisation holds the appropriate licence or permission.
- Avoid posting personal views that may be interpreted as organisational statements.

All official social media content and any new accounts representing Diabetes Australia must be authorised by the Marketing Team.

#### Personal Use of Social Media

Although personal use of social media is not restricted, our workforce must be aware that their online behaviour can impact colleagues and DA and must:

- Keep posts respectful and avoid content that could be interpreted as discriminatory, harassing, bullying, threatening, or disparaging.
- Not disclose confidential, sensitive, commercial or personal information obtained through their position.
- Consider whether posts may reasonably be linked to their employment and avoid behaviour that could have negative consequences for DA's reputation.

## 7. Workplace Health and Safety

Our workforce must uphold DA's commitment to health, safety, and wellbeing by acting responsibly and with care for themselves and others. This means:

- Taking reasonable steps to protect everyone's safety by following all lawful and reasonable directions, policies, and procedures
- Never attending work or performing duties under the influence of alcohol, illicit drugs, or in any condition that could compromise safety.

The workforce must familiarise themselves and comply with the Work Health and Safety Policy and related procedures and instructions to:

- Identify and control unsafe work conditions and practice.
- Operate safely and in accordance with our values, and this code.
- Report all risks, hazards, and incidents to their Leader, in line with the WHS Hazard and Incident Reporting and Investigation Procedure.

## 8. Child Safety

We are committed to providing a safe environment for all children and young people. Our workforce must actively support this commitment by creating safe, respectful and inclusive spaces, and must:

- Report any concerns about a child's safety or risk of harm without delay.
- Treat children and young people with respect.
- Act as positive role models and maintain clear professional boundaries at all times.
- Avoid contact outside service delivery-including through social media or personal communication.
- Not form close personal relationships or show favouritism towards any child, young person or their family.
- As required, hold a valid Working with Children Check and not start work without having one.
- Immediately notify their Leader if their clearance is suspended, revoked or otherwise affected.
- Familiarise themselves and comply with relevant child safety policy and related procedures at all times.

## 9. Bullying, Discrimination, Harassment and Sexual Harassment

We are committed to maintaining a workplace or work environment that is safe, respectful and free from bullying, discrimination, harassment and sexual harassment.

Our workforce has the right to raise concerns or report incidents without fear of victimisation, and we will ensure that those who speak up are protected and supported throughout the process.

The workforce must familiarise themselves with and comply with 1112-HR-POL-Unlawful Workplace Conduct Policy.

## 10. Conflict of Interest

This happens when an individual's personal interests are inconsistent with, could be inconsistent with, or could reasonably be perceived as inconsistent with DA's interests.

Unmanaged conflicts of interests can result in significant negative consequences, including reputational damage, loss of funding, contractual breaches and other impacts that prevent us from effectively fulfilling our purpose.

All conflicts (actual potential or perceived) must be declared immediately in writing and managed in line with the Fraud and Corruption Control Policy and related procedures.

## 11. Secondary Employment and External Engagements

Our workforce must ensure that any secondary employment or external engagement does not create an actual, potential, or perceived conflict with their duties or responsibilities to DA.

Secondary employment or engagements must not:

- Interfere with an individual's ability to perform their role for DA safely, effectively, and without impairment.
- Use or rely on DA's resources, information, or intellectual property.
- Adversely impact DA's reputation or relationships.
- Occur during working hours unless authorised.

Individuals must notify their DA if they are currently engaged in, or intend to engage in, secondary employment or any external engagement. Approval may be required before such work can commence or continue. DA reserves the right to refuse, condition, or withdraw approval if the arrangement is assessed as inconsistent with DA's obligations or expectations.

Undertaking unauthorised secondary employment or external engagement may be in breach of this Code.

## 12. Privacy

Our workforce must comply with the legislative obligations set out in the *Privacy Act 1988* (Cth) ('Privacy Act'), including the Australian Privacy Principles. The Privacy Act sets out the standards, rights and obligations of how personal and sensitive information is to be collected, stored, used, disclosed, retained and destroyed.

Our workforce must:

- Familiarise themselves with, and comply with DA's privacy policy at all times
- Protect personal and sensitive information by avoiding disclosure, except where required by official duties or law.
- Take every reasonable precaution to prevent unauthorised disclosure and report any breaches immediately to the relevant leader or use the data breach report form.

## 13. Confidentiality

You must at all times, maintain the confidentiality of DA's information. Information obtained through work must only be accessed, used, disclosed, or discussed on a strict need-to-know basis, with appropriate authorisation, and solely for purposes connected to the performance of your duties. It must be managed in line with the requirements of 1107-ICT-POL-Information Security Classification and Handling Policy.

You must take all reasonable steps to protect DA's information from unauthorised access or disclosure and must ensure that only individuals with proper authority are granted access. Any unauthorised use, sharing, or misuse of confidential information may result in disciplinary action and may also constitute a breach of contractual or legal obligations.

Where there is uncertainty about whether information is confidential, it must be treated as confidential until formal clarification is obtained.

## 14. Cyber Security

Cyber security is critical to protecting information and systems. You must actively participate in practices that maintain cyber security and:

- Protect organisational information, including personal and sensitive information, by only using systems authorised by DA.
- Safeguard login credentials, ensuring passwords, authentication codes, and security tokens are not shared under any circumstances.
- Comply with all Information Security policies, and directions, including requirements for password management, secure data transfer, device encryption, and acceptable use of technology.
- Exercise caution when handling emails, attachments, links, and external media, and verify the legitimacy of communications before responding or clicking.
- Report suspected or actual cyber incidents immediately, including phishing attempts, unauthorised access, or other suspicious system activity.
- Use only authorised and approved applications when accessing or handling DA information and minimise the use of external or non-approved tools. Personal data stored on organisational systems is not allowed.
- DA's systems are not designed for storage of your personal files. We recommend personal items such as family photos and documents be stored only on home devices.
- Maintain the device security by keeping software up to date, enabling security features, and ensuring unattended devices are locked.
- Only access Diabetes Australia information using approved and authorised devices.
- Refrain from using organisational systems for unlawful or inappropriate purposes.

## 15. Use of DA's Resources

You are expected to use DA's resources (including funds, equipment, technology, vehicles and facilities) efficiently, safely and only for authorised purposes. These resources must not be used for personal benefit or for any activity unrelated to official duties, unless expressly authorised.

All financial transactions, claims and reimbursements must be accurate, legitimate and properly documented and align with the requirements of the Fraud and Corruption Control Policy.

## 16. Gifts, Benefits and Hospitality

Gifts, Benefits and Hospitality that is intended to influence, or could reasonably be perceived as influencing, decisions or behaviour must not be accepted.

Any gift, benefit or hospitality must be declared using the online Gift Declaration Form. If the item is worth over \$100 in value, approval must be sought **before** accepting the gift. Further information can be found in the Fraud and Corruption Control Policy and related procedure.

## 17. Use of Personal Devices

Personal devices may be used in the workplace provided they do not interfere with a person's official duties, disrupt the working environment or compromise organisational security. Use of personal devices should be limited and must not affect productivity, performance or professionalism. Discretion must be used when using personal devices and comply with all requirements relating to information security privacy, confidentiality and safety.

## 18. Breach of Policy

Failure to comply with this Code, or report a suspected breach may result in consequences appropriate to your relationship with DA. This may include disciplinary action, termination of employment, cessation of engagement or ending an assignment.

Reports should be made to your Leader. If the concern relates to that Leader, the report can be escalated to the next appropriate level of management or the Chief People Officer at [CPO@diabetesaustralia.com.au](mailto:CPO@diabetesaustralia.com.au).

Where the disclosure concerns the Chief People Officer, the matter may be reported to the Group Chief Executive Officer. If the disclosure concerns the Group Chief Executive Officer, it may be reported to the Chairman of the Board.

## 19. Definitions

**Child Safety** - Child Safety refers to the responsibility to protect children and young people from harm, abuse, or exploitation and to maintain safe, respectful, and inclusive environments at all times.

**Confidential Information** - Confidential Information means any non-public information relating to Diabetes Australia, its operations, employees, or stakeholders. This includes, but is not limited to, financial data, strategic plans, intellectual property, and personal information obtained through work.

**Conflict of Interest** - A situation where an individual's personal interests are inconsistent with, could be inconsistent with, or could reasonably be perceived as inconsistent with DA's interests.

**Cyber Security Incident** - Any event that compromises, or has the potential to compromise, the confidentiality, integrity, or availability of DA's information or systems. Examples include phishing attempts, malware infections, and unauthorised access.

**DA Board** - means the Diabetes Australia Board of Directors. It includes all appointed Directors, including the Chair, and any Board committee members when acting in their Board or committee capacity.

**Diabetes Australia** - means Diabetes Australia (ABN 47 008 528 461) and its related bodies corporate as defined in the Corporations Act 2001 (Cth).

**Employee** - Refers to paid workers who are engaged on a:

- permanent (full-time or part-time) contract
- maximum/fixed (full-time or part-time) term contract
- casual contract.

**Gifts and Benefits** - include any item, service, hospitality, or advantage offered to an individual that could reasonably be perceived as influencing their decisions or behaviour.

**Leaders** - Leaders refer to any employee of Diabetes Australia in a leadership position including Executive Leader, Group Executive, Manager and Team Leader.

**Social media** -this encompasses various and ever-expanding platforms and online applications including but not limited to blogs, microblogs, social networks, wikis, podcasts, forums, and discussion boards, photo, and video sharing.

**Official Duties** - Official Duties refer to tasks, responsibilities, and activities performed by people in connection with their role or engagement with DA.

**Workplace (or work environment)** - All DA workplaces and any other relevant settings where work is performed or interactions occur, including physical locations, digital and online spaces, and work-related activities or events. This includes DA worksites, client or stakeholder locations, working from home, work related travel, training and conferences, work related social functions, and any communication channels used for work related contact.

**Workforce** - refers to employees (as defined above) and all other individuals who are not employees but perform duties or engage in activities connected to DA, including volunteers, labour hire workers, independent contractors, and work experience students.