



Ethics

Group Policy

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1 Introduction

For the purpose of the Group Ethics Policy, a CBHS Group entity means any of CBHS Health Fund Limited (“CBHS”), CBHS Corporate Health Pty Ltd (“CBHS Corporate”) and any other related body corporate (as defined in the Corporations Act (Cth)). For the purpose of this Group Ethics Policy, a reference to CBHS is a reference to the CBHS Group Entity, as applicable.

1.1 Overview

Ethics are the set of principles by which our actions may be judged to be right or wrong. Our ethics go beyond the constraints of obeying the law or adhering to rules, regulations or policies. They extend to the way we make decisions when it is not made clear by the law what the right thing to do is.

As employees of CBHS, we aim to conduct our business according to the highest standards of honesty, respect, and fairness when dealing with all of our customers and employees.

In line with the Risk Appetite Statement set by the Board, CBHS expects employees to conduct themselves with a high degree of integrity, and to perform work in the best interest of members. The appetite for behaviours which do not meet these standards is very low.

The purpose of this Policy is to foster a culture of openness, trust and integrity in business practices. Effective ethics is a team effort involving the participation and support of every CBHS employee.

This Policy outlines acceptable principles to be applied by all staff in their day to day activities and behaviour.

1.2 Understanding Ethical Behaviour

In deciding whether a particular action is ethical it helps to consider:

- Is it consistent with the standards of CBHS outlined in this Policy?
- What are the consequences of my actions for me and for CBHS?
- How easily could I explain my action if called upon to do so?

To assist you, it is important that you are aware of CBHS company policies and ensure that you comply with them.

1.3 Application

This Policy applies to everyone that carries out work for CBHS i.e. permanent full time and part time employees, the Board, as well as those working on a temporary basis including casuals and contractors.

2 Definitions

The following terms and definitions apply in this Policy.

Term	Definition
Board	Means the Board of Directors of CBHS or the Board of Directors of CBHS Corporate.
Contractor	Means a person who is not an employee but has been engaged by CBHS to undertake a specified work or project.
Customer	Means a member or potential member of CBHS, or any 3rd party who contacts CBHS.
CEO	Means the Group Chief Executive Officer & Executive Director of CBHS or the Chief Executive Officer & Executive Director of CBHS Corporate.
EEO	Means equal employment opportunity (ensuring fair and equal treatment).
Employee	Means a person who carries out work for CBHS (ie permanent, full time and part time employees, the Board as well as those working on a temporary basis including casuals and contractors).
External Service Provider	Means any person who is not an employee but who CBHS has an agreement with CBHS to provide specified services to CBHS from time to time.
Gift	A gift means anything that could be, or is perceived as being, of benefit to the recipient, where they are not required to pay the usual cost.
Manager	Means any person to whom a worker reports, who performs the role of Team Leader, Manager, Senior Manager or is a member of CBHS' Executive Team
Visitor	Anyone who is not a worker that presents to a CBHS premises lawfully during business hours.

1. Laws and Regulations

As a CBHS employee, you are subject to a range of laws and regulations and industry codes that you are required to comply with.

It is your obligation as an employee to know and understand how each of these laws, regulations and relevant industry codes (collectively known as “Compliance Responsibilities”) apply to the work you undertake for CBHS and to ensure you comply with each of your Compliance Responsibilities.

Some of these include but are NOT limited to:

- The Privacy Act 1988 (Cth) and the privacy legislation of the states and territories in which CBHS operates;
- The Competition and Consumer Act 2010 (Cth); and

- The Private Health Insurance Code of Conduct.

Any breaches of the law and your compliance responsibilities, can have serious consequences beyond your employment, both for CBHS and for you as an individual. To limit the chances of this occurring you are required to:

- Complete all required training and education programs to build and maintain your awareness and understanding of your Compliance Responsibilities; and.
- Where you are unsure as to whether a particular law, policy, procedure or practice applies, seek guidance from your direct Manager or the Compliance Manager.

2. Honesty

CBHS employees are expected to:

- Be honest in all your professional activities. Stealing, misappropriating money or property for private use; unauthorised access to information and fraudulent acts are generally criminal offences;
- Report any knowledge of fraud, error, breach of law or concealed practice which may be detrimental to the interests of CBHS to your Manager, another Manager or CEO;
- Be aware that CBHS could be a target of attempted fraud, and be alert to ensure that CBHS' position is protected and that it does not inadvertently participate in any illegal activity.

The protection of CBHS' funds is also your responsibility.

Acting honestly in our daily work also extends to ensuring we do not falsify reports, breach copyright or leak confidential company information to our competitors, customers or the media.

3. Treating others with respect & maintaining a safe working environment

CBHS is dedicated to the principle of equal opportunity for all employees without regard to race, colour, nationality, gender, sexual preference or other characteristic unrelated to performance.

Consistent with our **CARE Values**, in particular “**Respect**”, everyone working at CBHS is expected to ensure that all dealings with fellow employees and customers are treated ethically, fairly and with respect. This includes:

- Treating all employees and customers with courtesy and respect;

- Not engaging in harassing or bullying behaviour towards other employees or customers;
- Not discriminating on the basis of irrelevant characteristics, such as sex, race, disability, pregnancy, age, marital status, or sexual preference;
- Always putting safety first and doing your utmost to comply with workplace health and safety requirements.

We also have a responsibility to ensure that we conduct our business in ways that are to the benefit of our customers.

Therefore, CBHS employees are expected to:

- Treat all customers honestly and fairly;
- Avoid any program or practice which may be seen as deceptive or unfair;
- Make clear to all customers that we expect them to act honestly and fairly;
- Contribute to promoting a safe working environment by taking responsibility for health and safety and reporting any issues as soon as possible.

Any customer failing to adhere to these principles should be brought to the attention of your Manager.

4. Handling Private & Confidential Information

In your work at CBHS, you are likely to come across private personal and/or sensitive information relating to CBHS employees or customers. When people provide us with this type of information they are trusting CBHS.

Misuse of confidential and private information can have severe commercial and reputational consequences for CBHS and can also greatly affect those whose information is misused.

CBHS is committed to maintaining the confidentiality and security of such information and you are expected to do your part to help honour this commitment. For instance:

- Doing all you can to keep information secure. This includes not sharing private or confidential information with other employees unless they need it to perform their work.
- Never releasing information about customers or employees to third parties outside of CBHS unless the person the information relates to has agreed or if CBHS is required to release the information under the law.
- Following all protocols and procedures relating to the maintenance of passwords and user profile setup. Never allow someone else to log on using your individual details.
- Collecting, using, storing, handling, updating and destroying information, particularly personal information, in line with applicable policies and processes at all times.

For more information on handling private, confidential and/or sensitive information, refer to the CBHS Clean Desk Policy and relevant Privacy Policy.

5. Misuse of Company Property

CBHS' ethical standards require that CBHS property (such as computers, phones, printers) is not removed from the workplace without appropriate authority.

The equipment that CBHS provides to employees should only be used for legitimate business purposes.

6. Conflict of Interest

In all business relationships CBHS employees are required to:

- Act in accordance with the law and CBHS Group Ethics Policy;
- Protect CBHS' and their own reputation against accusations of actual, apparent or potential conflicts of interest; and
- Avoid situations or transactions in which their own interests conflict with the interests of CBHS or its customers.

7. Gifts and Benefits

a. Receiving Gifts

As a general rule, CBHS employees should not accept gifts from people with whom we come into contact in the course of our work including current or prospective members, contractors or external service providers.

Employees may only accept a gift if:

- It is of nominal value (i.e. less than \$100); and
- It cannot be construed as an inducement to favour the giver in any way; and
- To do so is consistent with good business practice and in line with the Group Ethics Policy.

Gifts, whether offered and not accepted or received, that are in excess of \$100, should be recorded in the **Gift Register** with the Protecht system, outlining things such as a brief description, the reason and value of the gift.

Although it is common practice to accept gifts of low monetary value such as calendars, pens or diaries, all such offers of gifts and advantages should be brought to the attention of your Manager.

If you receive a gift that falls outside the above criteria you must advise your manager. Consideration will be given to the cost or value of the gift and whether the gift will be of benefit to CBHS, or that acceptance of the gift is unavoidable.

Under no circumstances are gifts of money to be accepted.

Under no circumstances should employees accept a gift from applicants for employment or contracting opportunities with CBHS.

b. Giving Gifts

CBHS recognises that it is accepted business practice that gifts (or benefits or hospitality (e.g. meals, refreshments, or entertainment)) may be extended to customers at certain times. This may be in recognition of a new or an established ongoing business relationship, a reward, gesture of thanks or to build good will.

However, doing so must be for a proper purpose. This includes ensuring the gift:

- does not place or appear to place the potential receiver(s) under any obligation or undue influence, preferential treatment or could in any way be construed as a bribe;
- generally does not violate the acceptable ethical standards set out in this Policy; and
- is of limited value (never in cash), generally up to \$100 per gift/occasion.

In providing a gift, givers should be cognisant that receipt of a gift could be refused if acceptance is in conflict with the standards of conduct of the recipient's organisation or of any contractual agreement with a customer.

The practice of giving gifts externally, is generally limited to departments/roles that are involved in developing and/or maintaining important business relationships e.g. Sales, Marketing and some Executives.

Internally, CBHS is supportive of employees affected by life events such as weddings, , milestone birthdays, bereavement, hospitalisations, extended/chronic illness etc. by providing time off/leave, the EAP, flexible work hours, working from home etc.

In the case of such events, if employees would like to contribute to a gift/card/flowers, hold a shower etc., a collection can be organised and employees can 'put in' as a gesture of support for the affected employee.

As an exception to this rule, instances where it is appropriate for CBHS to fund the sending of flowers are:

- The birth of a baby of a CBHS employee;

- As condolences on the death of an immediate family member¹ and/or
- For an extended hospitalisation where an employee may be recuperating from surgery (i.e. not day or minor surgery) or other chronic or life-threatening illness.

Any intended gift, benefit or hospitality that of a value greater than \$100 needs Executive approval who will evaluate the purpose of the gift, ensure the appropriateness of the gift and whether it is within budgetary limits and in line with Delegations of Authority. It should be noted that gifts of \$300 or more given internally may attract Fringe Benefits Tax.

8. Communicating with External Media

It is expected that employees do not reference CBHS or respond to any CBHS reference in any external communication / media (including various forms of Social Media) without the consent (in each occurrence) or the explicit delegated authority (ongoing) of the Group CEO and Executive Director, Chief Marketing Officer, or the Group Company Secretary and COO for CBHS, and the CEO and Executive Director of CBHS Corporate.

9. Additional Manager Responsibilities

In addition to complying with all of the above, managers also have the responsibility to execute their managerial and supervisory duties with fairness. Managers are expected to:

- ensure compliance with Company procedures;
- make fair and impartial decisions;
- role model appropriate behaviours;
- exercise objectivity when administering rewards or discipline;
- not condone, permit, or fail to report any breaches of the above policy by employees under your supervision.

10. Confidentiality

All the affairs of CBHS, its members and employees will be treated with absolute confidentiality in accordance with the CBHS Privacy Policy and the CBHS Corporate Privacy Policy. This obligation continues should you leave CBHS.

¹ Eligible family members are usually defined as the immediate family members of an employee's household (generally spouse and children). In this instance this also extends to the parents (or significant carer) of the employee.

11. Breach or Suspected Breach

If you suspect that there has been a breach of the CBHS Group Ethics Policy it is your duty to bring this to the attention of your Manager, a member of the Executive Team or the CEO who can investigate the matter. (Refer to Group Whistle Blower Protection Policy). If at any stage you are unsure of any aspect of this Group Ethics Policy, speak to any of the abovementioned persons who will be able to assist you.

12. Related Policies

The following documents (available on INSITE) compliment the Group Ethics Policy:

- CBHS Group Fair Workplace Policy
- CBHS Group Work Health and Safety Policy
- CBHS Managing Unsatisfactory Conduct Policy
- CBHS Clean Desk Policy
- CBHS Group Whistle Blower Protection Policy
- CBHS Privacy Policy and CBHS Corporate Privacy Policy
- CBHS Social Media Guidelines

13. Policy Review

This Policy will be reviewed annually by People & Culture.