

### Document Metadata

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# AD – Policy - Code of Conduct

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## Introduction

This policy sets out the expectations to be adopted by SmartSat in everything that we do.

SmartSat's Code of Conduct Policy provides guidance on ethical issues and expected standards of behaviour by all staff members, contractors and anyone who represents SmartSat.

Underpinning this Code is our commitment to SmartSat Values and conducting our business affairs and operations legally, ethically and in accordance with the highest standards of integrity and propriety always. Our commitment forms the foundation for all our business dealings and relationships and is the basis on which our reputation with our key stakeholders, customers and partners is built.

## 1. References

This policy should be reviewed in conjunction with the following documents:

- Policy - Antibribery and Corruption
- Policy – Privacy
- Policy – Human Resources (Draft)
- Policy - Work, Health and Safety (Draft)

## 2. Our Values

- **Excellence & Impact** –We will conduct excellent and impactful research that creates commercial value for our partners and benefit our nation;
- **Innovation & Agility** - We will innovate in all of our activities, adapt to market changes and respond rapidly to our stakeholders' requirements in a productive and cost-effective way without compromising excellence and impact;
- **Collaboration** - We recognise that through collaboration we can achieve better outcomes for SmartSat and through intense collaboration can deliver more for Australia than our partners could do alone;
- **Integrity** - We are committed to the highest standard of openness, transparent accountability and ethical behaviour in all that we do; and
- **Diversity & Inclusion**- We celebrate diversity and acknowledge differences in gender, generations, geography & culture.

## 3. Responsibilities

When you agree to work with us, you agree to behave in ways that are consistent with the expectations outlined in the Code of Conduct Policy take personal accountability for:

- Reading and familiarising yourself with the latest version of this Code.
- Complying with the Code.
- Promptly reporting any concerns, you have about potential breaches of the Code to your manager or CEO.

- Complying with any investigations into concerns about breaches of the Code and/or any other company policy or procedure.

Managers have the additional responsibility of making sure staff members have read and understood the Code when they start working for our company and are kept up to date with any changes. It is everyone's responsibility to conduct themselves in a manner that would be considered ***reasonable in a workplace***.

#### **4. Objectives**

- We will perform our duties legally, ethically and professionally.
- We will ensure our personal business; financial and other outside interests do not conflict with our duty to the company.
- We will maintain confidentiality and not misuse information.
- We will respect and safeguard the assets, resources and information of the company, our customers and fellow staff members and contractors.
- We will treat our customers, the public and fellow staff members and contractors with courtesy and respect.
- We will do our jobs in a safe, responsible and effective manner.

#### **5. Legal, Ethical and Professional Conduct**

We expect you to:

- Carry out your obligations and responsibilities to the organisation appropriately.
- Conduct yourself in a professional manner.
- Act with trust, loyalty and respect towards your colleagues, suppliers and customers.
- Act honestly and in good faith in all dealings and relationships.
- Avoid deceptive, unfair practice, fraud, misrepresentation, improper personal gain or any behaviour which would reflect badly on the company.

#### **Australian Competition and Consumer Act 2010 (ACCC)**

- We expect you to comply with the requirements of the ACCC Act when dealing with external parties.
- This involves avoiding the use of misleading or deceptive statements and refraining from engaging in collusive or anti-competitive conduct with other companies.

#### **Privacy**

We expect you to comply with privacy laws.

#### **6. Conflicts of Interest**

We are committed to protecting our commercial interests and avoiding situations giving rise to conflicts of interest.

To help us to protect these interests, we expect you to immediately report any potential or actual conflict of interest to the CEO and or board when relevant for review and direction.

**A conflict of interest may exist when:**

- An activity or action may result in a staff member or other Related Party competing against our company, either directly or indirectly, in general business operations.
- Confidential Company information is used or shared inappropriately or without authorisation, knowingly or otherwise.
- You or any relative works for, owns, trades with, or supplies a competitor to the company.
- You or a relative serve as a director of another business.
- You have interests or investments in a competitor, customer or supplier.
- You are giving or receiving gifts, prizes and hospitality.

***Gifts, Prizes and Hospitality***

We recognise that gifts, prizes and hospitality have the potential to impact our ability to remain objective about the person or organisation providing them and could therefore represent a conflict of interest.

You must not take advantage of your position within the company to obtain a benefit for yourself or another person. This means:

**You may only accept a gift or benefit as follows:**

- Unsolicited gifts or benefits of an inconsequential or trivial nature (<\$100).
- Where refusal may offend (If the value of a gift accepted is estimated to be >\$100 then it must be brought to the attention of the CEO and recorded on the gift register as a Reportable Gift (Received)).

Any prizes won as a result of conducting official business must be reported to the CEO and become the property of the company.

Where invitations to local sporting, social and cultural functions are offered, care should be taken to ensure that your presence does not imply an inappropriate interpretation of your relationship with the host or preference in your dealing(s) with that person.

**You may not accept a gift or benefit as follows:**

- Gifts, benefits or hospitality during any period of contract negotiation or where it may give the appearance of undue influence.
- Any form of cash/cheques/vouchers (which may be cashed).
- Discounts or free services, goods, club memberships, travel and / or accommodation costs for yourself or family members, or subscriptions, unless prior approval has been given by the CEO.

**You may only provide a gift or hospitality as follows:**

- Gifts or hospitality may be given only where appropriate and where there is no risk of creating the perception of influencing the recipient in their decision.
- Gifts must be of minimal value and hospitality must not go beyond what is reasonable. Lavish or inappropriate gifts or hospitality are strictly prohibited.

All gifts or hospitality that is provided, where the value is estimated to be >\$100, must be brought to the attention of the CEO and recorded on the gift register as a Reportable Gift (Given).

## **7. Respect for others**

We are committed to treating our colleagues, customers, suppliers and other external stakeholders with courtesy, dignity and respect and providing a work environment free from discrimination, harassment, bullying and victimisation.

This means we will not tolerate any form of discrimination, harassment, bullying and victimisation.

- Under federal and state legislation unlawful discrimination occurs when someone, or a group of people, is treated less favourably than another person or group because of their race, colour, national or ethnic origin; sex, pregnancy or marital status; age; disability; religion; sexual preference; membership of a trade union; or some other characteristic specified under anti-discrimination or human rights legislation.
- Under federal and state legislation unlawful harassment occurs when someone is made to feel intimidated, insulted or humiliated because of their race, colour, national or ethnic origin; sex; disability; sexual preference; or some other characteristic specified under anti-discrimination or human rights legislation. It can also happen if someone is working in a 'hostile' - or intimidating - environment.
- Bullying may be defined as behaviour that intimidates, offends, degrades or humiliates someone and can include:
  - Physical or verbal abuse.
  - Yelling, screaming or offensive language.
  - Excluding or isolating staff members.
  - Assigning meaningless tasks unrelated to the job.
  - Giving staff members impossible jobs.
  - Deliberately changed work rosters to inconvenience staff members.
  - Undermining work performance by deliberately withholding information vital for effective work performance.

Victimisation occurs where someone is treated detrimentally because they have raised a genuine complaint or given information in relation to a complaint.

## **8. Safe and Responsible Work**

SmartSat is committed to safety and we must all work in a safe manner and promote the safety of others. This policy is an integral part of our total management plan. Our GOAL OF ZERO injuries to staff members, contractors and members of the public within our workplace. This can only be achieved through consultation and cooperation with all.

All staff members have responsibility for their health and safety and must work together with managers to ensure a safe working environment.

We expect staff members to:

- Work in a safe and healthy manner.
- Follow and comply with all reasonable safety guidelines, instructions and training.
- Consider the safety of other staff members, contractors, visitors and customers.
- Report all incidents, accidents, near misses and hazards immediately.

- Follow instructions of the site when visiting clients, contacting events, attending events or training.

Managers are responsible to ensure WHS processes and systems are followed in the workplace and to take action to implement procedures and address any issues or concerns.