

Code of Conduct and Ethics

This document outlines our guiding principles and gives an overview of the behaviours you can expect, and that are expected of you during your employment with Get Skilled Access (GSA). It should be read alongside GSA's full suite of policies.

At GSA, we are disability led, by people with disability. We challenge society by educating and enabling people and organisations to be inclusive, and we do this by designing and delivering a diverse range of products, services, and consulting. There are no other organisations that cover the breadth and depth of disability inclusion that we do, through consulting, training, and digital recourses, delivered by people with disability and lived experience.

Our Vision

Inclusion, choice and control for all people with disability.

Our Purpose

Creating a new generation of disability inclusion that is equitable for all.

Our **Code of Conduct and Ethics** provides a framework for decision making, and outlines the standard expected of all GSA employees in the performance of their duties and interactions in the workplace. Please read and understand the information within this Code and talk to your manager if you have any questions.

Scope

The Code of Conduct and Ethics applies to all employees of GSA, including permanent, fixed term and casual employees. The Code also applies to contractors, consultants, and visitors who engage with us.

GSA Values

Our company values underpin this Code of Conduct, and the behaviour we expect from all employees. The GSA core values are:

- Disability at the forefront of our decision-making
- Constantly curious to innovate
- Positive and passionate for what we do
- Work hard, whilst not taking ourselves too seriously

In addition to bringing our values to life through the work you do every day, employees can also help further embed our values by:

- Understanding and complying with all corporate policies and procedures
- Maintaining the highest possible standards of ethical conduct and speaking up in the event you feel any of these standards are being compromised.

Equal Employment Opportunity

GSA practises Equal Employment Opportunity throughout its workplace processes and procedures to ensure that every employee is able to participate freely and equally in the workplace.

Leadership Responsibilities

Those in positions of leadership at GSA are responsible for developing and encouraging an environment in which all employees understand their responsibilities and feel comfortable raising concerns.

Leadership Responsibilities include, but are not limited to:

- Leading by example through living the GSA values and role modelling inclusive leadership behaviours;
- Ensuring their teams are familiar with this Code and GSA's policies and procedures;
- Facilitating open communication with peers regarding this Code and any ethical issues when they arise;
- Always addressing an ethical issue, and ensuring this is done in a timely and respectful manner; and
- Appreciating the difficulty of raising an ethical issue and creating a safe environment that encourages colleagues to speak up if they become aware of a problem.

Guiding Principles

Integrity and honesty

Employees are expected to behave with honesty, integrity, care and diligence throughout the course of employment. You are encouraged to report any doubtful behaviour or matters to your manager that you feel contravene this principle. Issues may be external (clients, government bodies etc) or internal, and include making derogatory remarks that could offend and/or have the potential to cause reputational harm to GSA and/or its collaborators.

You also have a responsibility to use GSA property and facilities appropriately, and only use company funds for their proper purpose. This includes:

- Showing reasonable care and neither using, nor allowing the use of company property, resources or funds for anything other than authorised purposes
- Treating GSA property with due care and ensuring it is secured against theft and misuse.

Policies which relate to this principle include:

- IT & Social Media
- Recruitment
- Expenses
- Bullying, Harassment and Discrimination

Respect and encouragement

All GSA employees are expected to contribute to an honest, unbiased and unprejudiced work environment. All employees of GSA are expected to treat others with respect and protect and promote cultural safety. Employees must never discriminate, harass, bully, vilify, sexually harass or intimidate colleagues, contractors, consultants, or anyone else associated with work at GSA. GSA is committed to ensuring the physical and psychological health of its employees.

Policies which relate to this principle include:

- Bullying, Harassment and Discrimination
- IT & Social Media
- Child safety

Conflict of interest

All employees are responsible for identifying and reporting to their supervisor any potential areas of conflict between private interests and professional responsibility toward GSA, without delay. Conflicts of interest are situation-dependant and can include:

- Pecuniary interests, i.e., financial gain or other material benefits
- Non-pecuniary interests, i.e., favours, personal relationships and associations

The test of the existence of a conflict of interest is whether an independent observer would reasonably believe the actions or decisions of an employee, contractor or director may have been or could be in the future, affected by considerations of personal gain, other external commitments or a close personal relationship.

Anti-bribery and anti-corruption

GSA is committed to conducting business in compliance with all applicable anti-bribery and anti-corruption laws in all countries in which it operates. GSA's values require that employees act honestly, adhere to the highest ethical standards, and act in compliance with all relevant legal requirements. In this respect, employees of GSA must not engage in bribery or any other form of corruption.

Policies which relate to this principle include:

- External directorships and appointments
- Recruitment
- IT & Social Media
- Discipline

Privacy and confidentiality

As a general obligation, you must not disclose or use anything which could be considered intellectual property, other property or confidential information belonging to GSA, except as required or authorised in the legitimate performance of your duties, without prior written permission from the organisation or as required by law.

Confidential information is any information which relates to the business affairs of any entity at GSA, including its clients, stakeholders and employees, which is not publicly available and includes, (but is not limited to):

- Information relating to GSA corporate strategy, business plans and product development
- GSA client database
- GSA sales figures, marketing and promotional plans, future business plans, all trade secrets and all business, financial marketing and technical information, ideas, concepts, technology, processes and knowledge belonging to GSA which is not publicly available
- Information which is proprietary and confidential to GSA clients and/or stakeholders

Policies which relate to this principle include:

- IT & Social Media

Safe working environment

GSA is committed to providing a safe workplace, both physically and psychologically. Employees are expected to promote a healthy and safe working environment and report any concerns about health, safety or security without delay. Employees are required to:

- Comply with relevant Health and Safety legislation



- Treat Health and Safety as the highest priority and report hazards immediately
- Complete all GSA provided Occupational Health and Safety training
- Continue to value and promote work life balance for all employees

Policies which relate to this principle include:

- Workplace Health and Safety
- Drug and Alcohol
- Employee Leave
- Flexible work
- Child safety
- Bullying, Harassment and Discrimination

Reporting

It is important that you report any conduct that you believe has or may have breached this Code of Conduct and Ethics, the law and/or GSA's policies and procedures. Any breach should be reported promptly, honestly and in good faith. All reports are treated seriously and confidentially and the necessary steps will be taken to investigate the situation in accordance with the Speak Up Procedure. If an allegation of breach of this code is raised against a GSA employee, the Discipline Policy may apply.

Reporting Child Safety Concerns

Any allegations of child abuse or child safety concerns that arise in the course of your work with GSA must be reported immediately to the supervising staff member, who must respond to ensure the child's immediate safety and report the allegation/s to a member of GSA senior management. Allegations of suspected child abuse will be reported to the Police and/or Child Protective Services. Further information regarding the safety of children in the workplace should be read in the Child Safety Policy.

Policies which relate to this principle include:

- Child Safety
- Discipline
- Bullying, Harassment and Discrimination

Accountability

Every employee is subject to local, state and federal laws and you are responsible for ensuring you are aware of all relevant regulations. There are many duties and obligations requiring compliance before, during and after your employment at GSA. Details of these responsibilities can be found in your employment contract and GSA's policies and procedures. You are required to abide by the terms and conditions of



these documents. Any breaches of this codes, GSA's policies and/or unlawful or improper conduct will be promptly and thoroughly investigated based on the method deemed appropriate and may result in disciplinary action.

GSA encourages, supports and protects employees to properly report non-compliant, illegal or unethical conduct.