

HR1 Code of Conduct

Thrive Care Group Subsidiaries



This policy is part of Thrive Care Group's (Thrive) comprehensive policy suite, designed to guide and govern operations across all subsidiaries. It establishes a unified framework that ensures consistent standards, accountability, and alignment with Thrive core values and strategic objectives. The policy applies to all employees, contractors, and stakeholders within Thrive and its subsidiaries, supporting seamless governance and compliance throughout the organisation.

HR1 Code of Conduct

Policy Statement

1. Thrive requires all workers to conduct themselves in accordance with the highest standards of ethics, integrity, and behaviour when dealing with clients, colleagues, and other stakeholders.
2. This code sets out the required standards of behaviour for all workers engaged by Thrive, and applies whenever a worker is working for, or representing Thrive or one of its subsidiaries, including outside of business hours.
3. Where these standards are not met, appropriate disciplinary action will be taken.

Procedures

1. The below outlines the standards of conduct required to ensure a positive and professional environment at Thrive:
 - a. Employees should comply with:
 - i. all Company and workplace policies, procedures, rules, regulations and contracts;
 - ii. the relevant industry Codes of Conduct;
 - iii. all laws, statutes and guidelines applicable to Thrive in the delivery of its duties;
 - iv. all reasonable and lawful instructions given by or on behalf of Thrive.
 - b. Employees should display professional conduct at all times, including:
 - i. dedicating their full attention, time, and skill during working hours to perform their duties effectively;
 - ii. acting in the best interests of Thrive at all times, including outside of working hours, and do not do anything which could cause damage to or potential damage to, Thrive's reputation;
 - iii. conducting all interactions with honesty, fairness, courtesy, and respect towards clients, colleagues, management and the general public;
 - iv. prioritising Thrive's best interests by acting diligently and in good faith at all times;
 - v. working in a safe and compliant manner, adhering to workplace health and safety rules and responsibilities;
 - vi. refraining from posting or sharing information about Thrive on social media, or any other public platform, in a manner that may harm Thrive's reputation;

- vii. to not solicit, canvass or approach any clients, their families or representatives or colleagues to entice away from Thrive, or to limit, cease or reduce their involvement with Thrive, or provide counsel, advice or assistance to them to do any of the above.
- c. Behavioural Expectations and Appropriate Conduct
 - i. At all times, behave in a way that upholds Thrive's core values and the integrity and good reputation of Thrive;
 - ii. Treat all individuals with dignity and respect, showing an appreciation of their social, cultural and individual backgrounds;
 - iii. Avoid any behaviours towards clients, colleagues, management and the general public that could be potentially of a discriminatory, bullying or harassing nature (whether real or perceived);
 - iv. Act promptly to address concerns impacting the quality and safety of care and services;
 - v. Actively work to prevent harm and respond swiftly if any risk to the client's safety arises;
 - vi. To not use, or come to work under the influence of drugs or alcohol;
 - vii. Maintain a presentable, clean, neat and tidy appearance (including but not limited to wearing any uniform or footwear that is required of you by Thrive).

2. Conflict of Interest

- a. Employees should not place themselves in a position where their duty to Thrive conflicts, or appears to conflict, with their personal interests or duty to another organisation.
- b. Employees should immediately report any actual, potential or apparent conflict of interest to their manager or the Head of Human Resources and must cease any activity in which a conflict arises or appears to arise unless authorised in writing by your manager.
- c. Annually, employees are required to complete an online [Conflict of Interest Declaration form](#) and acknowledge the Conflict of Interest Declaration on Employment Hero. Completion of the declaration form must be made even when an employee has no conflict to declare.
- d. The following are examples of actual or apparent conflicts of interest which must be reported:
 - i. An employee or a member of their family has an interest or shares in a business providing services to Thrive;
 - ii. An employee undertakes work for, or has an interest or shares in, a business that competes with Thrive;
 - iii. An employee accepts a payment or benefit from a client or supplier (or a potential client or supplier) as an inducement or reward (real or perceived) for a transaction conducted on behalf of Thrive;

- iv. An employee works for another business that hinders or impacts upon the employee or contractor's performance of duties with Thrive.
 - e. Employees are required to take steps to comply with any direction from Thrive to resolve or mitigate any Conflict of Interest, especially where these may give rise to a conflict with the performance of the employee's obligations to Thrive, confidential information or reputational interests.
3. Secondary Employment
- a. Employees are required to declare secondary employment, supporting Thrive to prevent worker fatigue, reduce the likelihood of illness being spread, and manage risks that may affect the safety and quality of care provided to clients.
 - b. Secondary employment refers to any paid or unpaid work you undertake in addition to your role with Thrive, regardless of whether the employer or organisation operates in the same sector or industry. This may be regular or occasional, and includes work with another employer, self-employment, freelancing, casual work, or volunteering.
 - c. Examples include:
 - i. You work a second paid job with another employer;
 - ii. You volunteer for an organisation that provides similar or different services than your employer;
 - iii. You run a small business or perform freelance work in your own time.
 - d. Annually, employees are required to complete an online [Secondary Employment Declaration form](#) and acknowledge the Secondary Employment Declaration on Employment Hero. Completion of the declaration form must be made even when an employee has no secondary employment to declare.
 - e. Thrive has a duty to protect the health and safety of all employees and clients by preventing worker fatigue, reducing the likelihood of illness being spread, and managing risks that may impact the quality of care delivered.
 - f. Employees have important responsibilities, including cooperating in safety measures, fulfilling the terms of their employment contract, and acting in the best interests of Thrive by avoiding conflicts of interest.
 - g. Declaring secondary employment is designed to protect workers, their colleagues and our clients by assessing the situation and managing any risks using organisational processes such as workload planning, fatigue monitoring, or conflict of interest management. Reasonable discussions about secondary employment are necessary to balance these duties and obligations, ensuring a safe and effective workplace for everyone.
 - h. Once disclosed, Thrive will:
 - i. Assess the nature and extent of the secondary employment;
 - ii. Determine appropriate actions, which may include:
 - Restrict available working hours with the Organisation to reduce the risk of fatigue ;

- Respond to and manage illness outbreaks;
 - Understand any conflicts of interests.
- iii. Record the declaration and any management strategy in Thrive's Secondary Employment Register. This information is reported at the Management and Board levels to ensure transparency and appropriate management of risks identified.
 - iv. Breaches of procedure including a failure to disclose secondary employment may result in disciplinary action, up to and including termination, where appropriate.

4. Use of Company Resources

- a. Employees must use company resources in an appropriate and professional manner which upholds the integrity and good reputation of Thrive and its subsidiaries.
- b. You may only use company resources for authorised, lawful, work-related purposes associated with the performance of their duties and responsibilities.
- c. Work emails, programs and files used on Thrive's internet and computer systems remain the property of Thrive.
- d. All company equipment and materials must be returned to Thrive on request and upon termination of employment.
- e. Employees are responsible for protecting company resources that are under their control and must take all appropriate and reasonable steps to safeguard them from loss, damage, interference, theft and unauthorised use.
- f. Employees should ensure all devices are password protected and locked when not in use, connect devices only to secure connections and in secure locations.
- g. Employees must:
 - i. Show respect for Thrive's property including all devices, as well as the property of clients and any environments where work is undertaken;
 - ii. Treat all Company property and Company provided equipment with respect, ensuring items are only used for their intended purpose and not for other purposes.

5. Use of Confidential Information

- a. During employment or engagement, an employee or contractor may have access to and knowledge of confidential information belonging to Thrive. Employees and contractors must not at any time, either during or after ceasing work, use or disclose confidential information except as authorised or required in the legitimate performance of duties.
- b. Whatever measures are reasonably necessary to preserve confidential information, should be taken, including:
 - i. Complying with all security measures established by Thrive to safeguard confidential information; and

- ii. Keeping confidential information under your control.
 - c. Employees or contractors must maintain the highest standards of confidentiality with respect to any information obtained about clients, their families or representatives. They must:
 - i. Only access client information on a need-to-know basis to perform their job responsibilities;
 - ii. Refrain from discussing client information with other clients, colleagues, unauthorised individuals or in public areas;
 - iii. Use secure methods for storing and transmitting client information, in accordance with Thrive's policies and relevant privacy laws; and
 - iv. Report any breaches of confidentiality or unauthorised access to client information immediately to their manager.
 - d. If unsure about what constitutes confidential information, or whether you require permission to share or disclose certain information, you should seek guidance from a member of the Executive team.
- 6. Use of Intellectual Property
 - a. Any intellectual property created or generated by any employee or contractor in the course of their employment or engagement or produced for use by Thrive becomes the property of Thrive, and remains so unless otherwise agreed in writing (for example, via contract).
 - b. Employees and contractors must protect Thrive's intellectual property from unauthorised use or misappropriation, and must not:
 - i. Make available that intellectual property for use by any other party for any unauthorised purpose; or
 - ii. Use that intellectual property in any way which is outside the scope of work for Thrive.
- 7. Restraints and non-solicitation
 - a. During the employee's employment, the employee will have access to confidential information belonging to Thrive and build connections with clients and workers of Thrive.
 - b. To protect these interests, both during the employee's employment, and for a reasonable period following the termination of their employment with Thrive, an employee:
 - i. should not solicit, canvass or approach any clients, their families or representatives to entice away from Thrive, or to limit, cease or reduce their involvement with Thrive;
 - ii. should not solicit, interfere with or endeavour to entice any worker away from Thrive; or
 - iii. provide counsel, advice or assistance to clients, their families, representatives or other workers to do any of the above.

8. Use of Social Media

- a. We understand that social media is an important tool and part of our everyday lives, however it is important to understand that when you post things online, that this may reflect on your work, this includes communications in online channels and social networks as well as public posts.
- b. Endorsed social media accounts such as Facebook and Instagram are managed by Thrive, and authorised employees can use social media to:
 - i. Promote the brand and the company's work;
 - ii. Promote programs and services offered by the company;
 - iii. Share content and planned messages to audiences; and
 - iv. Build relationships with existing and prospective clients.
- c. When employees use social media networks, they should:
 - i. Not post anything on social media that refers to their employment, the company or any persons associated with the company (including clients, employees or suppliers) in a negative connotation.
 - ii. Ensure that personal comments do not bring Thrive or any person associated with the organisation into disrepute.
 - iii. Not disclose confidential information belonging to Thrive or any information that the employee is required to keep confidential, including information about clients and colleagues.
 - iv. Not post any pictures, images or other items of their work, place of work or clients, or photos taken when performing their work duties without Thrive's express permission (and client permission if relevant).
 - v. Not participate in social media networks in such a way that negatively impacts upon their effectiveness and productivity at work, and are not to access social media sites during working hours unless the use is directly related to the performance of duties required in the course of their employment.

9. Gifts and benefits

- a. Employees should not, in connection with their employment, accept any financial or other benefit from any entity other than Thrive, unless in accordance with Thrive's other workplace policies or is otherwise disclosed to Thrive and expressly permitted.
- b. Employees should not solicit, accept, or receive any gifts or financial assistance (money, gift cards, loans, gifts or vouchers) from any clients, their families or representatives:
 - i. Small token gifts of a nominal value (e.g. a thank-you card, or homemade goods) given as a gesture of appreciation are acceptable;
 - ii. Gifts or benefits that have been pre-approved by Thrive's management as part of a formal recognition program are acceptable.

- c. If an employee is offered any gift or benefit that does not meet these criteria, they must politely decline and report the offer to their manager or the People and Culture team.
10. Use of drugs and alcohol
- a. Employees must not come to work if they are under the influence of drugs or alcohol, and must not remain at or return to work, if during their work shift, they consume drugs or alcohol.
 - b. Employees must not smoke, vape or use e-cigarettes inside any Thrive building, client's home or vehicle. The use of cigarettes, vapes and e-cigarettes is not permitted while delivering services.
11. Reporting responsibilities and consequences of breach
- a. If you suspect this Code of Conduct has been breached, please advise your manager or the People and Culture team.
 - b. You must report any conduct that is, or may be, in breach of any of the above, without delay.
 - c. Where you believe the breach could be 'reportable conduct' such as criminal behaviour, fraud, assault or other serious improper conduct, then this can also be reported under HR2 Whistleblower Policy.
 - d. Where an employee is found to be in breach of any part of this policy, then the individual may be subject to disciplinary action in accordance with HR7 Disciplinary and Grievance Policy.
 - e. Depending on the significance or severity of the breach, action taken by Thrive may be up to and including dismissal or cessation of engagement.

Related Business Procedures

1. HR2 – Whistleblower
2. HR3 – Workplace Diversity, Inclusion and Respect
3. HR4 – Recruitment and Selection
4. HR5 – Employment Lifecycle
5. HR7 – Disciplinary and Grievance
6. Thrive Care Group Conflict of Interest Declaration
7. Thrive Care Group Secondary Employment Declaration

Responsible Persons

1. The Chief Executive Officer must:
 - a. Manage and monitor compliance with this policy.
 - b. Support employee competence and compliance with this policy.

2. People and Culture team must:
 - a. Provide guidance, advice and support to managers and employees to ensure compliance with this policy.
 - b. Maintain relevant declarations and records (such as Conflict of Interest and Secondary Employment) required under this policy.
 - c. Manage reporting, escalation and documentation requirements associated with breaches of this policy, in line with Thrive's disciplinary and grievance procedures.
3. Management must:
 - a. Manage and monitor compliance with this policy.
 - b. Ensure employees receive appropriate training, supervision and debriefing to comply with this policy.
 - c. Ensure any breaches, concerns or disclosures related to this policy are responded to promptly and in accordance with Thrive's procedures
3. All Thrive employees, volunteers and subcontractors must comply with this policy.

Definitions

1. **Aged Care Code of Conduct:** means the Aged Care Code of Conduct as set out in the Aged Care Act 2024 (Cth).
2. **Company Resources:** means all property, assets, equipment, funds, facilities, confidential information, intellectual property and / or services, belonging to Thrive, including those provided by third parties.
3. **Confidential Information:** includes information relating to Thrive, operating procedures, financial information, business and strategic plans, technology, databases, computer software and programs, employee information, trade secrets, marketing information, evaluations, supplier and client information.
4. **Intellectual Property:** includes all inventions, models, designs, drawings, plans, software, reports, proposals and other materials created or generated by an employee in the course of their work, whether during or outside of working hours, for use by Thrive.
5. **NDIS Code of Conduct:** means the the National Disability Insurance Scheme (NDIS) Code of Conduct set out in the National Disability Insurance Scheme (Code of Conduct) Rules 2018.
6. **Reportable Conduct:** is any behaviour by an employee, contractor, or volunteer that must be formally reported because it breaches legal, regulatory, or organisational standards and poses a risk to safety, wellbeing, or integrity. This includes:
 - a. Abuse, neglect, or exploitation of clients
 - b. Physical assault, sexual misconduct, or harassment.

- c. Serious breaches of duty of care.
 - d. Unauthorised restrictive practices.
 - e. Financial abuse or fraud involving vulnerable individuals.
 - f. Criminal behaviour or serious misconduct that compromises safety or trust.
7. **Thrive:** Thrive Care Group Pty Ltd ABN 68 637 232 752, together with each of its subsidiaries.

References

1. Aged Care Act 2024 (Cth) and its associated regulations
2. National Disability Insurance Scheme (NDIS) Practice Standards and their associated regulations
3. Privacy Act 1988 (Cth)
4. Work Health and Safety Act 2011 (Cth) and associated regulations

Version Control

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