



1. INTRODUCTION

This Employee Code of Conduct relates to all employees of the Legatus Group ('LG').

2. PURPOSE OF THIS POLICY

The purpose of the Code of Conduct is to ensure a high level of integrity in the conduct of the business of LG and to contribute to good organisational culture.

3. SCOPE OF THE POLICY

LG expects all employees to observe the standards set out in this Code of Conduct.

This Code incorporates both obligations imposed by LG which relate to integrity, impartiality and good decision making and Government imposed obligations related to gifts and benefits.

This Code does not attempt to provide a detailed and exhaustive list of what to do in every aspect of work. Instead, it sets out standards of behaviour expected and provides a broad framework that will help decide on an appropriate course of action when faced with an ethical issue. The Code places an obligation on all employees to take responsibility for their own conduct and work with colleagues cooperatively to establish consultative and collaborative workplaces where people are happy and proud to work.

4. CODE OF CONDUCT

4.1 Principles

The Code identifies principles that are fundamental to integrity in administration and the good functioning of business. Appropriate conduct and behaviours are derived from these principles:

- Integrity, impartiality and good decision making
- Promotion of the aims and objectives of LG
- Accountability and transparency
- Commitment to the system of LG

The alignment of these principles contributes to good organisational culture.

4.1.1 Integrity, Impartiality and Good Decision Making

The principle of integrity, impartiality and good decision making underpins confidence in the dealings of LG and assists the member councils and LG in meeting its legislative obligations to its employees and LG members. In keeping with this principle, all employees must:

- a. Act honestly, ethically, impartially, and with integrity, in the performance of their duties by ensuring decision making processes are (and are seen to be) fair and transparent.
- b. Provide advice that is objective, impartial, justifiable and lawful and not influencing in an improper manner, the making of decisions by others.
- c. Accepting or receiving gifts or benefits only in compliance with the Act, the Code of Conduct for LG Employees, and as may be supplemented by any relevant policy of LG.
- d. Address conflicts of interest in accordance with the Act, as may be supplemented by any relevant policy of council, and whether actual, material, perceived or potential. This is to be done by:
 - i. Identifying, declaring and managing those conflicts of interest so that conflicts (including perceived conflicts) do not interfere with the proper performance of duty.
 - ii. Reporting any concerns around conflict-of-interest management to direct supervisors, and in the case of the Chief Executive Officer, to the LG Chair.
- e. Demonstrate a high standard of personal conduct and behaviour at work when dealing with other workers, elected members and the community by:
 - i. Showing respect and demonstrating appropriate behaviour toward all persons, including employees, other workers, LG members and the public.
 - ii. Providing fair and balanced representation of policies or direction of LG.
 - iii. Demonstrating behaviour that supports and promotes the reputation of LG members and does not reflect adversely on the reputation of the LG.
 - iv. Ensuring conduct at work is free from harassment (being persistent unreasonable disturbance of a person or group where that behavior could reasonably be expected to trouble or stress the person(s), including any form of sexual harassment).
- f. Demonstrate a high standard of personal conduct and behaviour at work when dealing with other workers, elected members and the community by:
 - i. Ensuring conduct at work is free from bullying (being repeated unreasonable behavior towards a person or group in circumstances where the behaviour creates a risk to health and safety); and
 - ii. Discrimination by ensuring compliance with anti-discrimination legislation and the policies of LG designed to achieve a safe and healthy workplace.
 - iii. Responsible use of social media in accordance with any policies of LG relating to social media.

- g. Comply with obligations to report suspected conduct in breach of this Policy in accordance with the mechanisms LG has established for bringing of such reports or complaints
- h. Comply with legislative obligations to report suspected maladministration in public office to the Office of Public Integrity, the Independent Commissioner Against Corruption, and/or the SA Ombudsman.

4.1.2 Promotion of aims and objective of LG.

The principle supporting the promotion of the aims and objectives of local government ensures programs, services and resources are delivered as intended by LG. All employees must:

- a. Comply with all relevant procedures and delegations of authority for the procurement of goods and services by:
 - i. Ensuring confidential information which is marked, or reasonably known to be confidential, is kept in the strictest of confidence.
 - ii. Not disclosing confidential or sensitive information to gain a direct or indirect advantage for any other person, or cause detriment to LG.
- b. Adhere to standards of professionalism and customer service that provide excellent community and customer outcomes by:
 - i. Engaging responsively with member councils and the community.
 - ii. Communicating decisions and policy information that is accurate and timely.
- c. Remain accountable and responsible for the use and collection of public funds.
- d. Use their best endeavors to provide accurate information at all times.
- e. Base decisions or actions on information that is factually correct, and after obtaining and considering all relevant information.
- f. Comply with all lawful and reasonable directions.
- g. Only make public comment when specifically authorised to do so and restrict such comment to factual information and professional advice.
- h. Take responsibility for the health and safety of themselves and others when carrying out their duties and activities, which includes general wellbeing and physical injury.
- i. Maintain adequate documentation to support important decisions and actions.
- j. Use LG resources responsibly and for legitimate and authorised purposes only, and in a manner that does not cause harm to the community or environment.

4.1.3 Accountability and transparency

The principle supporting accountability and transparency contributes to community and members trust and confidence and ensures a high level of integrity in the conduct of business of or for council. LG employees will:

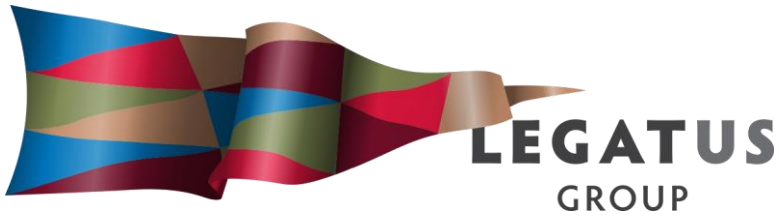
- a. Deal with information (other than that lawfully in the public domain) received in employment in a responsible manner (including after employment with LG) by:
 - i. Using it for the purpose for which it was collected.
 - ii. Storing and allowing access to it in accordance with the law.
 - iii. Not using information improperly for gain, or to the detriment of LG.
- b. Act with reasonable care and diligence in the performance of duty by:
 - i. Complying with contractual obligations, instructions, policies and procedures of LG and the expectations of the position reasonably made known to LG employees.
 - ii. Respecting, complying with and carrying out the lawful policies, resolutions and decisions of LG.
- c. Ensure proper and responsible use of resources of LG including public property and facilities intellectual property, corporate knowledge, confidential and sensitive information.

4.1.4 Commit to the continuous improvement of LG's capacity and performance, its planning, processes and service delivery.

5. Gifts and Benefits

Schedule 2A of the Local Government (General) Regulations 2013 sets out the provisions of the Code of Conduct in respect to gifts and benefits as follows:

- (1) An employee of LG must not seek out or receive a gift or benefit that is, or could reasonably be taken to be, intended or likely to create a sense of obligation on the part of the employee to a person or influence the employee in the performance or discharge of the employee's functions or duties.
- (2) If an employee of a LG receives a gift or benefit of an amount greater than the amount determined by the Minister (from time to time), by notice published in the Gazette, the employee must provide details of the gift or benefit to the Chief Executive



Officer of LG in accordance with any requirements of the Chief Executive Officer.

Reporting an Alleged Breach: All employees must comply with the Policy or report any alleged breaches:

- to their supervisor or manager, or in the case of the Chief Executive Officer, to the Principal Member of LG. In the event that any factor prevents this then
- as may be required by the Act;
- as may be required pursuant to the Independent Commissioner Against Corruption Act (SA) 2012.

An employee who is found to have breached the Code will be subject to counselling and/or other disciplinary action (including termination) in accordance with the law.

I. Applicable Legislation

Sex Discrimination Act 1984

Fair Work Act 1994

Age Discrimination Act 2004

Australian Human Right Commission Act 1986

Disability Discrimination Act 1992

Racial Vilification Act 1996 (SA)

Work Health & Safety Act 2012

Equal Opportunity Act 1984 (SA)

Local Government Act 1999

Local Government (General) Regulations 2013

6. AVAILABILITY & GRIEVANCES

This policy is available for inspection at LG office during ordinary business hours.



It is also available for inspection, download or printing, free of charge, from LG’s website at www.legatusgroup.sa.gov.au

Any grievances in relation to this policy or its application should be forwarded in writing addressed to the Chief Executive Officer, Legatus Group, PO Box 419, Clare SA 5453.

7. REVIEW

This Legatus Group Policy shall be reviewed by LG within (4) years of the issued date.

Date	Revision Number	Reason for Amendment