



SUMMERSET GROUP HOLDINGS LIMITED

CODE OF CONDUCT POLICY

1. Policy

Note: Guidance in this document applies to Summerset New Zealand and Australia. Any differences between New Zealand and Australia are indicated.

1.1. Policy statement

At Summerset, we believe all staff are entitled to a safe and inclusive workplace that places value on fairness, impartiality, responsibility and trustworthiness. Our people are expected to understand and meet the requirements of this policy and to perform responsibly, ethically and with a high standard of behaviour at all times.

Our Code of Conduct provides our team with guidance on Summerset's values and sets out our expectations in relation to workplace behaviour, legal and ethical standards in all work-related matters.

This Code of Conduct policy exists to ensure all employees and contractors of Summerset behave appropriately and practice standards of professional and personal conduct that are consistent with Summerset's values and uphold the public reputation of the organisation. This required standard of acceptable conduct and behaviour supports Summerset's vision and ability to maintain public trust and confidence in the quality of the services we provide.

Compliance with this Code of Conduct and Summerset policies is a requirement of your employment. From time to time, Summerset may update or amend these documents, and it is the responsibility of all team members to stay informed and understand our expectations.

We are committed to providing resources and support to all team members, to ensure a safe and inclusive workplace for everyone.

1.2. Scope

We all have a responsibility to support the shared interests of Summerset and promote positive workplace behaviours. This Code of Conduct applies to all employees, contractors, volunteers, and anyone conducting business on behalf of Summerset (for example, students and agency contractors). It applies whenever work is conducted for or representing the organisation, including outside business hours (e.g., at work or industry functions).

1.3. Values

Summerset's purpose is Bringing the Best of life to our older generations and the following values are what we prioritise to achieve our purpose:

- Strong Enough to Care
- One Team
- Strive to be the Best

At Summerset, our values shape our behaviours and organisational culture, and they play a crucial role in our relationships and interactions. It is expected that in carrying out your duties you will role model our values by:

- Considering our customers in all of your actions
- Being honest, diligent and performing your duties to the best of your knowledge and ability
- Protecting and promoting Summerset's best interests and reputation

- Working collaboratively with colleagues, other staff and managers across the business
- Encouraging and contributing to an innovative and continuous improvement culture
- Exercising good judgement and take responsibility for your actions
- Complying with, and promoting compliance with all Summerset practices, policies and procedures
- Complying with lawful and reasonable instructions issued by Summerset
- Being in a fit state to carry out your full work duties when reporting for work and during working hours.

2. People

2.1. Conduct & Behaviour

The Code of Conduct and the behaviours outlined within it are fundamental to building a healthy and positive culture at Summerset. The Code of Conduct is designed to guide us in the way in which employees and contractors are expected to relate to other employees, employers, our residents, visitors, and stakeholders. Our Code of Conduct is a broad framework that will help guide conduct and behaviour in the performance of your role and your interactions in the workplace.

When carrying out your duties, you are expected to act honestly, reasonably and in good faith, considering the best interests of Summerset, our residents and colleagues. We expect you to do the best job you can, not just do your job.

All Summerset employees and contractors are expected to maintain a standard of professional behaviour that maintains and promotes confidence, trust, and respect. As employees and contractors, our personal and professional conduct must strive to create a harmonious, safe, inclusive, and productive workplace that models our ethos and organisational values. It is your responsibility to:

- perform to the best of your ability and be committed to a high quality of work performed in a safe manner
- carry out your duties in an efficient and competent manner, maintain specified standards of performance and always uphold the highest standards of honesty and integrity
- comply with lawful and reasonable instructions, policies and procedures from Summerset, and to work as directed
- deliver the highest standard of products and services to Summerset's stakeholders
- make decisions ethically, fairly and without bias using the best factual information available
- adhere to the principles of Summerset's Code of Ethics Policy when dealing with others within the Summerset group and in engaging with external stakeholders
- respect the dignity of Summerset, employees, suppliers, residents and prospects and other stakeholders by treating them with fairness, respect, courtesy, honesty and sensitivity to their rights
- respect the privacy of your colleagues and residents and use confidential information and images only for the purposes for which they were intended
- behave in a positive, polite, professional and inclusive manner to others and abide by all instructions relating to the way to treat other people
- not behave in a way that results in a disrespectful, hostile, intimidating or offensive work environment;
- maintain a safe work environment that is free from bullying, harassment and discrimination
- not behave in a way that would be considered bullying, discrimination, vilification, harassment or sexual harassment

- have zero tolerance for, and prompt handling of, incidents of bullying, harassment or discrimination
- neither use, nor allow the use of Somerset property, resources, or funds for other than authorised purposes
- neither personally use Somerset recreational facilities, nor allow the personal use of Somerset recreational facilities by family or friends
- avoid conflicts of interest and disclose any potential or apparent conflict of interest to Somerset
- uphold the good name of Somerset without speaking in a derogatory way of the company, other staff or Somerset residents
- comply with any legislative, industrial or administrative requirements, and all lawful and reasonable directions given by persons in authority
- comply with all Somerset policies and procedures relevant to your position
- act responsibly in the event of becoming aware of any unethical behaviour or wrongdoing by any other employee and report such conduct or activities to the appropriate level of management; and
- encourage the reporting of behaviour that breaches this policy.

Behaviours that are not appropriate include:

- unwelcome, inappropriate or rude remarks and jokes
- dishonesty of any kind, including falsification of documentation
- spreading rumours or making inappropriate comments about others (e.g., regarding a person's appearance or personal life)
- inappropriate or rude communications, via email, text message and/or social media. This includes insults, derogatory terms, and inappropriate language such as swearing
- displaying of inappropriate materials and pictures
- use of unprofessional language
- repeated unwelcome invitations or repeated questions about personal life
- threats, insults or name-calling
- unnecessary and unwelcome physical contact, including sexual or aggressive contact
- excluding others, including withholding information or ignoring their contribution
- mistreatment of residents, staff, visitors or contractors
- failing to protect the privacy and dignity of our residents
- failing to report a health and safety hazard, injury, or incident.

2.1.1. Responsibilities

All employees and contractors have a responsibility to:

- be aware of and comply with the Code of Conduct at all times; and
- report behaviour that may be contrary to the Code of Conduct and required standards of behaviour.

In addition, managers and those in a leadership role are responsible for:

- role modelling the required behaviours and standards identified in the Code of Conduct including through the day-to-day leadership of employees
- ensuring all employees and contractors are aware of the conduct and behaviours expected of them as described in the Code of Conduct

- ensuring all employees and contractors have access to copies of the Code of Conduct and other relevant documents and policies
 - taking timely and appropriate steps to resolve conflict that arises in the workplace to ensure an inclusive, healthy and harmonious work environment
 - taking timely and appropriate action to address breaches of the Code of Conduct.
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2.2. Health and Safety

You must ensure you are familiar with and comply with H&S policies and instructions relating to your area of work, and never compromise your health and safety, or put the health and safety of others at risk. You are responsible for ensuring you arrive in a fit and healthy state to work, disclosing any medical conditions or medications that may impact you at work, and ensuring you follow all safety requirements, including wearing protective equipment when required.

You must not come to work if you are under the influence of drugs or alcohol and must not consume these during your working hours. In particular, you must not operate machinery or vehicles while under the influence of drugs or alcohol or are otherwise impaired. Where possible, you should notify your manager if you are prescribed drugs that may impact you at work prior to attending the workplace.

3. Organisation

3.1. Compliance with Laws, Policies, Procedures

Summerset is committed to conducting all its operations and dealings in full compliance with the law. You must ensure you are familiar with and comply with the laws, including the requirement to hold and maintain current licenses. You must ensure that any records you keep or submit are true and complete, including all reports, leave records and expense claims.

3.2. Conflict of Interest

All Summerset employees and contractors have a fundamental duty of employment to act honestly, in good faith, with reasonable care and diligence to work in the best interests of Summerset and avoid situations and actions that may be, or create the appearance of being, in conflict with our overall objectives and principles of the organisation. It is important that you make sure your employment with Summerset doesn't conflict, or appear to conflict, with your personal interests or duty to any other organisation. If any actual, potential or apparent conflict arises, this must be immediately disclosed to your manager, and any activity ceased until approved by your manager.

Examples of actual or apparent conflicts of interest that should be disclosed may include:

- if you are employed by a competitor whilst employed by Summerset;
 - if you provide work or business on behalf of Summerset to an organisation in which you or your family member has a significant financial interest;
 - if you or your family has a substantial financial interest in an organisation which is a competitor, contractor or supplier to Summerset;
 - working for any other organisation which could impact your ability to do your job for Summerset;
 - being involved in employee selection where you know or are related to the person applying to work at Summerset; and
 - being in a position where you have an influence over remuneration, or allocation of work or hours, of a family member or close personal friend. A close personal friend would include anyone with whom you have, or develop, an intimate relationship with.
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3.3. Use of Confidential Information

'Confidential Information' includes information relating specifically to Summerset operating procedures; financial information; company and strategic plans; technology, databases,

computer software and programs; passwords; trade secrets; marketing information; evaluations, supplier information.

During your time at Summerset you may have access to, and knowledge of, confidential information belonging to Summerset. It is vital that when using confidential information, you must:

- protect confidential information from inappropriate use or copying by you or someone else and immediately notify your manager of any suspected breach or actual unauthorised use, whether deliberate or accidental;
- only access confidential information when it is required for work purposes;
- not use confidential information for any unofficial or non-work purposes; and
- only release confidential information if authorised to do so or required in the legitimate performance of your role.

We require any third party to sign the Summerset standard confidentiality agreement prior to engaging in detailed discussions or negotiations that require confidential information to be disclosed.

You are only permitted to release confidential information in accordance with established policies and procedures. As a guideline, you should not provide information unless:

- required to do so by law;
- appropriate authority has been granted to release the information; or
- the information is officially available to the public and is released in accordance with Summerset procedures.

3.4. Use of Company Resources

Company Resources means all property, assets, equipment, vehicles, IT Resources, funds, facilities, Confidential Information, Intellectual Property and/or services, belonging to Summerset, including those provided by third parties.

We have an expectation of all team members to use Company Resources in an appropriate and professional manner for authorised, lawful, work-related purposes, and protect them from misuse. They are to be used effectively, economically, and carefully and for the benefit of the Summerset. This means you will not:

- use tools or equipment belonging to Summerset to complete work for a third party;
- use a vehicle belonging to Summerset other than for authorised purposes;
- use a credit card / petrol card belonging to Summerset for unauthorised personal use;
- take equipment belonging to Summerset for personal use; or
- remove resources from the Summerset premises or leave them unsecured.

3.5. Use of Information Technology Resources

'IT Resources' include electronic systems that belonging to Summerset such as computers, computer systems and software, handheld computers and tablets, mobile phones and the internet. We require all employees to comply with any IT policies in place, and always:

- maintain the security of computer systems and network (including passwords);
- comply with licensing and copyright requirements;
- use IT Resources in an appropriate and lawful manner, including ensuring that you do not access, store or distribute potentially offensive or illegal materials; and
- use IT Resources in a way that does not result in unlawful sexual harassment, discrimination, victimisation or bullying.

Your usage is monitored on an ongoing and continuous basis to ensure appropriate use of IT equipment and compliance with our policies. It is important that you understand that information transmitted or received by IT Resources may be monitored, intercepted, and viewed by an authorised person, subject to relevant laws, including privacy laws.

3.6. Use of Intellectual Property

'Intellectual Property' includes all inventions, models, designs, drawings, plans, software, reports, proposals, and other materials created or generated by you in the course of your role (whether during or outside your working hours), for use by Summerset.

Intellectual Property rights include, but are not limited to, patents, copyright, registered designs, trademarks, the right to have confidential information kept confidential, and any application or right to apply for registration of these rights.

It is vital that you protect the Summerset Intellectual Property from unauthorised use or misappropriation.

Intellectual Property created or generated by you within your employment or engagement or resulting from your work is the sole property of Summerset unless otherwise agreed in writing.

3.7. Use of Position

You must not use your position at Summerset to gain, or seek to gain, a benefit or advantage for yourself or any other person.

3.8. Obligations after Leaving Summerset

We understand that team members will move on to other opportunities outside of Summerset, however, if you leave Summerset (for other employment, self-employment, or contract work), you cannot:

- while you are still employed by Summerset, use your position to influence decisions and advice in favour of your new employer;
- take or retain hard or electronic copies of any Summerset files, records, correspondence, including emails on mobile devices;
- disclose confidential or sensitive information to your new employer or provide other information that would give your new employer or business an advantage;
- use your knowledge of, and contacts within Summerset to lobby or otherwise seek advantage for your new employer or own business in dealing with Summerset.

If you are unsure whether your new employment could present a conflict of interest, please speak to your manager.

3.9. Breach

If you suspect this Code of Conduct has in any way been breached, please discuss this with your manager. It is important to advise your manager if you are concerned the conduct is:

- fraudulent;
- corrupt;
- in breach of regulatory or legal requirements;
- unethical (either representing a breach of this Code of Conduct or more generally);
- conduct that jeopardises the health and safety of employees, the work environment or public safety;
- other seriously improper conduct; or
- any other conduct which may cause negative impact to the organisation or a team member.

At Summerset we encourage legitimate concerns to be reported without the fear of retribution or negative impact.

3.10. Consequences of a Breach

Summerset has the expectation that all team members will fully comply with this Code of Conduct and will treat any breaches seriously. As a valued team member at Summerset, you have a responsibility to act consistently with the standards and expectations set out in the Code.

Where it is established that any team member or contractor has breached the Code of Conduct, they may be subject to disciplinary action, up to and including termination of employment or contract.

4. Engaging with others

4.1. Public Statements

Unless expressly authorised, you must not publicly comment (written or verbal) about any activities that may impact or involve Summerset, its employees, employers or other stakeholder, whether directly or indirectly. Do not respond to negative public posts or comments about Summerset (e.g., Facebook, Twitter, or LinkedIn). It is important that you are familiar with our Social Media Policy.

4.2. Other Employment

You are required to obtain written approval from Summerset prior to undertaking any paid work for any organisation, which could conflict (or could be perceived to conflict) with your role at Summerset or affect your ability to perform your role. If approval is granted for other employment, you must ensure that your primary role with Summerset is not adversely affected, or Summerset is not impacted by your other employment.

If conducting work for your own business or any other organisation, you must ensure that when you are working for Summerset, you arrive in a fit and healthy state to work, devote your full time and attention to the performance of your role and don't do anything to advance your outside interests.

This means:

- not conducting the other work during your usual working hours;
 - not using Summerset's premises or resources (including telephone, cellphone, internet, computer, email, photocopier) for the other work; and
 - always performing your role at Summerset to the expected standard.
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4.3. Anti-bribery and Corruption

Corruption is against the law and undermines the integrity of governments and economies. You must never offer or accept bribes, kickbacks, or similar payments, including any irregular payment to win business or influence a business decision in Summerset's favour. This is also applies to consultants, contractors, intermediaries or business partners dealing with or on behalf of Summerset.

A bribe is not only payment or receipt of cash. A bribe can be anything of value and can take many other forms, including:

- the offering, giving or receiving of any form of gift, consideration, reward or advantage to or from someone in business in order to obtain or retain a commercial advantage;
- payments in-kind including any non-cash items of value such as travel, hospitality, entertainment, employment opportunities, and gifts;
- employment of family members outside the normal hiring process;
- sponsorships/donations; and
- where the offering, giving or receiving of a bribe is made by or through a third party.

4.4. Gifts, Benefits & Hospitality

To protect and promote public confidence in the integrity of Summerset, employees (and immediate family) must not accept gifts or benefits if this may create an actual or perceived conflict of interest or may improperly influence you in the performance of your role. At Summerset we believe gifts must never be accepted unless there is clear justification, consistent with the guidelines outlined in the Gifts, Benefits and Hospitality Policy – ANZ (C45).

If you are unsure whether a gift or benefit should be accepted, we encourage you to seek clarification directly with your manager.

4.5. Consumption of Alcohol at a Summerset Licensed Premise

To ensure Summerset maintains a culture of safety and professionalism in the workplace, employees and contractors are prohibited from consuming alcohol within any Summerset licensed premise without the express permission of either the Village Manager or the Group Operations Manager. This includes during both scheduled working hours and non-working hours.

Where permission is granted, you must consume alcohol in a reasonable manner, in accordance with this policy, to ensure that your behaviour does not interfere with the safe operations of the village, or the care provided to our residents.