

EMPLOYEE CODE OF CONDUCT POLICY

1.0 PURPOSE

The Nido **Employee Code of Conduct** sets out standards of behaviour required of everyone within Nido. We are all accountable for our own actions and must comply with this Policy and any supporting policies at all times.

The aim of the Employee Code of Conduct is to:

- Set out the high standards of honesty, integrity and ethical, professional, responsible and law-abiding behaviour expected of Nido Employees;
- Ensure the highest standards of behaviour are maintained within Nido; and
- Ensure Nido employees understand their obligation to report any violations of this policy.

Nido is committed to this Code of Conduct as a means of ensuring we always act in the best interest of our business, our employees, our families, and the children we care for at all times.

The Code of Conduct will be reviewed regularly to ensure that it is operating effectively and if there are any changes that are required to the Code.

2.0 SCOPE

This policy applies to:

- All employees whether permanent, maximum term or casual
- Families and children
- Prospective employees
- Students, contractors, and visitors

Most Relevant Policies and Procedures

- ECS026 Child Safe Code of Conduct Policy
- FAM006 Family and Visitors Code of Conduct Policy
- EMP001 Employee Grievance Policy
- EMP002 Workplace Health and Safety Policy
- EMP006 Substance Abuse Policy
- EMP008 Diversity and Inclusion Policy
- EMP011 Roster Policy
- EMP009A Employee Leave Policy
- NES006 Privacy Policy
- NES011 Anti-bribery Fraud and Corruption Policy
- NES014 Securities Trading Policy
- NES016 Whistleblower Policy

Related Professional Learning

- Nido Learning – Nido | Mandatory Policy – Code of Conduct

3.0 DEFINITIONS

TERM	DEFINITION
CONDUCT	Conduct refers to the way a person behaves, especially in a particular place or situation, such as the workplace.
CONFLICT OF INTEREST	<p>A conflict of interest is any interest, activity, or influence outside Nido that may:</p> <ul style="list-style-type: none"> • influence an employee’s judgment when acting on behalf of the Company • be in direct competition with the Company or; • divert business away from the Company
DISCRIMINATION	<p>Discrimination occurs when a person is treated less favourably or harassed in certain areas of public life including their employment because of a personal characteristic or prescribed attribute that is protected under law.</p> <p>Direct discrimination occurs when a person is denied a benefit or an opportunity on the grounds of any of the prescribed attributes.</p> <p>Indirect discrimination occurs when a policy, rule or practice has a discriminatory effect against a person or group of people in relation to any of the prescribed attributes.</p> <p>An ‘attribute’ includes another person’s:</p> <ul style="list-style-type: none"> • race; • colour; • sex; • sexual orientation; • social origin; • religion; • family or carer’s responsibilities; • age; • physical or mental disability; • marital status; • political opinion; • pregnancy; • national extraction; • personal association with a person or people identified by reference to any of these attributes.
WORKPLACE BULLYING	<p>Bullying is repeated, unreasonable behaviour directed towards a worker or a group of workers that creates a risk to health and safety and is unlawful. Bullying can occur by direct or indirect means.</p> <p>Repeated behaviour refers to the persistent nature of the behaviour and can involve a range of behaviours over time.</p> <p>Unreasonable behaviour means behaviour that a reasonable person, having regard for the circumstances, would see as unreasonable, including behaviour that is victimising, humiliating intimidating or threatening.</p> <p>Direct bullying occurs between the specific people involved.</p> <p>Indirect bullying involves third parties participating in bullying behaviours, for example passing on insults or spreading rumours. Indirect bullying mostly inflicts harm by damaging another's social reputation, peer relationships and self-esteem.</p>

4.0 OBLIGATIONS

All employees have an obligation and duty of care to:

- Comply with prevailing community standards of equity, justice, fairness, and compassion in dealing with others within and beyond the company.
- Read, understand, and comply with all company policies and procedures.
- Perform duties in a responsible and professional manner, with due regard for company policies and other legal requirements and obligations.
- Practice responsible stewardship of company resources.
- Promote and protect the company's reputation in the wider community.
- Act appropriately when a conflict arises between our self-interest and our duty to the company.
- Act honestly and fairly in all commercial dealings and conduct themselves with professional courtesy and integrity.
- Perform their responsibilities with due care, diligence, and good faith.
- Respect all people they have dealings with; and
- Report possible dishonest or fraudulent behaviour they become aware of in accordance with this Code of Conduct policy.

5.0 BEHAVIOUR

Personal Conduct

All employees are expected to:

- Treat everyone with courtesy, respect, kindness, consideration, and sensitivity to their rights.
- Refrain from all forms of harassment and discrimination based on gender, race, religious belief, political affiliation, pregnancy, disability, sexual orientation, or illness.
- Always act honestly, with integrity and in good faith, and be respectful of the trust placed in them.
- Respect everyone's rights to privacy and keep personal information confidential.
- Consider the impact of their decisions and behaviour on the well-being of others.
- Refrain from acting in any way that would unfairly harm the reputation and career prospects of other employees.
- Refrain from allowing personal relationships to affect professional relationships.
- Seek to resolve legitimate concerns, issues, or complaints that may arise in the workplace, regardless of their nature or severity, in accordance with the Nido ***Employee Grievance Policy***.
- Seek advice from an appropriate manager where a colleague's behaviour is perceived to be in breach of this Code of Conduct, and report any suspected corrupt, criminal, or unethical conduct to a member of the People team or the CEO.

Professional Conduct

All employees are expected to:

- Perform their duties diligently, impartially, conscientiously, with integrity, and to the best of their ability.
- Take responsibility for the health and safety of ourselves and others when carrying out our duties.



- Dress appropriately for the workplace and work tasks in accordance with the Nido **Employee Dress Standards Policy**.
- Arrive to work on time according to our employment agreement/contract and respect the time of others within and outside the company.
- Keep up to date with advances and changes in the body of knowledge and the professional and ethical standards relevant to our area of expertise.
- Strive to always achieve the highest product, service, and professional standards.
- Comply with any relevant legislative, industrial, or administrative requirements including observance and application of anti-discrimination policy.
- Comply with the principles of environmental responsibility.
- Foster teamwork and collegiality among all employees and give due credit to the contributions of others.
- Ensure Nido's property is protected and used for legitimate Nido business purposes. Nido property (including computers, telephones, other devices, and network systems) must not be used to communicate or distribute inappropriate or offensive language or material.
- Not attend for work and/or perform any work task if they are under the influence of alcohol or drugs.
- Cooperate with others in the workplace to create a safe and healthy workplace in accordance with any applicable Occupational Health and Safety policy.
- Take no improper advantage of any official information gained in the course of our employment.
- Refrain from allowing personal political views and/or affiliations or other personal interests to influence the performance of duties or exercise of responsibilities.

Child Safe Conduct

Nido is committed to creating and maintaining an environment that promotes the safety of all children. This includes encouraging a culture where the prevention and reporting of abuse is supported and encouraged. All staff, students, and volunteers are responsible for promoting the safety, wellbeing, and empowerment of children in accordance with the Nido **Child Safe Code of Conduct Policy** which specifically sets out how employees, students, volunteers, contractors, and families are required to behave around children.

Out-of-hours conduct

All employees are expected to engage in appropriate conduct outside business hours. Employee conduct outside of hours may warrant investigation and discipline if it:

- is likely to cause serious damage to the relationship between Nido and the employee;
- damages Nido 's interests; or
- is incompatible with the employee's duty as an employee.

6.0 ATTENDANCE & TIMEKEEPING

All employees are expected to attend work on time and be ready to start work by their agreed or rostered commencement time. Employees are expected to:

- Record their actual start times, finish times, absences and any other time and attendance related data as reasonably required by Nido accurately in the Nido time and attendance system.
- Comply with Nido policy and procedures relating to attendance and leave, according to the Nido **Roster Policy** and the Nido **Leave Policy** including:

- providing their manager or nominated supervisor with notification of lateness and or unplanned absences as soon as possible and in the required manner; and
- applying for planned leave including annual leave, long service leave and parental leave in advance, confirming leave is appropriately authorised prior to its commencement.

7.0 ADDITIONAL RESPONSIBILITIES OF LEADERS

In addition to their responsibilities as an employee, leaders, and managers at Nido are expected to:

- Assist staff to understand what is expected of them in their roles.
- Build staff members' knowledge of our values, company policies and procedures and all relevant laws that affect their roles.
- Communicate changes to Nido policies and procedures to staff.
- Give feedback and coaching to staff to help them perform to the best of their abilities.
- Provide an environment where staff can raise concerns and discuss them openly without fearing or experiencing any negative consequences in accordance with the **Nido Employee Grievance Policy**.
- Provide staff with equal opportunities to develop their skills.
- Work, think and act safely as well and empower staff to do the same.
- Address underperformance and poor standards of behaviour in staff members in a timely, fair, and procedurally sound manner.
- Set the tone, leading by example, and managing fairly and consistently.

8.0 ANTI-BULLYING, HARASSMENT & DISCRIMINATION

Nido will not tolerate any form of discrimination, harassment, sexual harassment, bullying or any behaviour or language that is abusive, offensive, or unwelcome. All employees must:

- comply with all applicable legislation regarding harassment, sexual harassment, bullying, or discrimination in the workplace;
- comply with all Nido policies and procedures relating to equal employment opportunity, diversity, bullying, harassment, sexual harassment and discrimination specifically the **Nido Workplace Bullying Policy**, and the Nido **Diversity & Inclusion Policy**;
- not engage in any form of direct or indirect bullying, harassment, sexual harassment, or discrimination;
- offer support to others who experience discrimination, bullying, harassment, or sexual harassment, including providing information about how to make a complaint; and
- report any incidents of bullying, harassment, sexual harassment, or discrimination to an appropriate manager or a People team representative.

9.0 ALCOHOL, DRUG AND TOBACCO USE

Employees are not permitted to:

- use, possess or traffic illegal drugs on any company premises;
- attend work suffering from the effects of drug use, alcohol, or illegal substances; or



- consume alcohol at work (including during breaks or meal breaks). Exceptions are via management approval only – for events such as work functions or social events where children are not present.

Smoking is not permitted on any of our premises. This includes the use of e-cigarettes (vaping) and applies whether or not the e-cigarette contains nicotine.

Employees must not be impaired by alcohol, or drugs (legal or illegal) while at work or when performing their duties, in accordance with the Nido **Substance Abuse Policy**.

Employees must adhere to all restrictions that apply to smoking in accordance with the Nido **Workplace Health & Safety Policy**.

10.0 CONFLICTS OF INTEREST

All employees are expected to:

- Ensure that their financial and other interests and actions do not conflict or seem to conflict with the obligations and requirements of the company's position – or advance their own interests over those of the company.
- Avoid any financial or other interest or undertaking that could, directly or indirectly, compromise the performance of their duties.
- Take all suitable measures to avoid or deal appropriately with any situation in which they may have, or have been seen to have, a conflict arising out of their relationship with others within or beyond the company.
- Declare their relationship when participating in decisions affecting another person with whom they have a personal relationship.

A conflict of interest is any interest, activity, or influence outside Nido that may:

- influence an employee's judgment when acting on behalf of the Company;
- be in direct competition with the Company; or
- divert business away from the Company.

Employees should conduct all business transactions in the best interests of Nido, avoiding situations which interfere with, or could be seen to interfere with, their ability to exercise good judgment in relation to Nido.

Examples of conflict of interest may include but are not limited to:

- having a personal financial interest in a company to which you are directing business;
- directing business to a supplier that is owned or managed by a friend or relative;
- using company equipment or facilities to assist an outside business;
- conducting a personal relationship with someone else who works at Nido which could create a conflict or perceived conflict with your or their employment duties; and
- working on company premises or on company time for anyone other than Nido.

If you think you may have a potential or an actual conflict of interest, you have an obligation to raise it with your manager.

11.0 PERSONAL GAINS, GIFTS AND OTHER PAYMENTS

Employees must not:

- Accept payments, gifts, or other kinds of reimbursement from a third party that could affect or appear to affect their objectivity in business decisions, or which may be seen as excessive beyond socially acceptable

boundaries.

- Improperly use their position, property or information acquired through their position for personal gain or the gain of an associate, or to compete with or harm Nido, and must keep their personal or external business dealings separate from Nido's business dealings. Employees must only use goods, services and facilities received from Nido in accordance with the terms on which they are given.
- In addition, Employees must not accept commissions or payments which may be seen as constituting bribery or fraud or participate in corrupt business practices and must comply with the Nido **Anti-Bribery, Fraud and Corruption Policy**.

12.0 STEWARDSHIP OF COMPANY RESOURCES

Employees have a responsibility to protect any company resources that are in their care. Company resources include any property, financial assets, documentation, and equipment belonging to Nido.

All employees are expected to:

- Use company resources properly, responsibly and for legitimate purposes only.
- Seek permission before using company resources for personal purposes.
- Use resources in a manner that causes no harm to the community or environment.
- Strive to always obtain value for company money that is spent and avoid waste and extravagance in the use of company resources.
- Secure all company resources against theft or fraud.
- Maintain the integrity and security of all company intellectual property.
- Maintain the security, integrity, and confidentiality of all relevant company commercial and other information.

13.0 PROTECTION AND PROMOTION OF THE COMPANY'S REPUTATION

All employees are expected to:

- Promote the company wherever possible in their professional dealings with others.
- Refrain from representing themselves as spokespersons, or acting for or on behalf of the company, unless authorised to do so (and when in doubt seek advice from a senior manager or the CEO).
- Refrain from engaging in any activity that may compromise the company's integrity and reputation.

14.0 RESPECT FOR HUMAN RIGHTS

Nido supports and respects the protection of human rights within its sphere of influence, in particular, supports effective elimination of compulsory labour and child labour, and it will make this a selection criterion in the choice and management of its relationships with suppliers and sub-contractors.

15.0 COMMUNITY RELATIONS

Nido is committed to making a positive social contribution to the communities in which it operates. Nido is also committed to embracing diversity as set out in the Nido **Diversity & Inclusion Policy**.

16.0 FAIR DEALING

Nido is committed to ensuring it does not engage in behaviour or allow or ignore behaviour by others that violates the principles and the laws of fair competition including those set out in the *Competition and Consumer Act 2010* (Cth) and the fair-trading laws in the relevant state or territory. Fair competition means that the Nido competes on



the basis of customer service and products rather than by obstructing competitive conduct and that Nido only uses its strength in legitimate ways. As a general rule:

- Employees must not make deals with Nido's competitors about how Nido competes;
- Employees must not discuss, exchange information or make arrangements with competitors on matters such as pricing or pricing policies (past, present or future), marketing approaches, promotions, profits, costs, terms and conditions of sale, choice by customers, territories, or engage in the limiting of production of, or boycotting of, a competitor, distributor or customer;
- Employees must not engage in unethical business practices that limit or prevent competition, or use Nido's position to limit or exclude a third party from competing with Nido;
- Employees must be fair in their dealings with competitors and must not be insulting about Nido's competitor's products or services; and
- Employees must not make any false or misleading statements in the course of recruiting or promoting new staff.

17.0 INSIDER TRADING

Employees should be aware that they may from time to time be in possession of price sensitive information relating to Nido and the value of issued securities that is not generally available to the wider market, and accordingly must ensure that they comply at all times with the Nido **Securities Trading Policy**.

18.0 COMMUNICATIONS AND PRIVACY OF DATA

Employees are not permitted to make public comments on behalf of Nido.

Only authorised persons may comment on behalf of Nido. Employees must not publicly discuss workplace activities, projects and practices nor disclose anything of a confidential nature.

Employees must refrain from speaking to the media unless authorised to do so and refer all enquiries to the Managing Director and/or the Chair, as appropriate.

Nido is committed to open and transparent communications within the confines of confidentiality and privacy. Employees must respect the privacy of information relating to individual persons (whether employees or third parties) which they hold or handle as part of any information processing activities. Employees must not, without proper authority, access, modify, disclose, or make use of any confidential, commercial and/or personal information for any purpose other than for authorised and necessary work purposes and must ensure they familiarise themselves with, and comply with the privacy laws of Australia (or where applicable, the jurisdiction of their business unit).

Employees must otherwise deal with such information in accordance with the Nido **Privacy Policy**.

19.0 CONFIDENTIALITY

Any information acquired by Employees while performing their duties is confidential information of Nido, its customers or suppliers and must be kept confidential. Employees must not use or disclose confidential information unless authorised to do so and the use or disclosure is permitted by law. Executive Leadership Team members must not disclose the information to a third party except where that disclosure is:

- Authorised by the Board of Directors of each Company ("each a **Board**"); or required by law or a regulatory body (including a relevant Stock Exchange).

The existence and details of each Board and company management information, discussions, and decisions that are not publicly known and have not been approved by each Board for public release, are confidential information and subject to this Code.

Employees must not use confidential information for an improper purpose or to obtain personal benefit for themselves

or others.

All Company documents should be properly safeguarded at all times, whether on Company premises or otherwise. They should never be falsified, manipulated, or destroyed before the regulated legal statutory period.

Employees' obligation to maintain the confidentiality of the Company's confidential information continues after your employment with Nido ends.

20.0 COMPLIANCE WITH THE LAW AND NIDO POLICIES

Nido respects the law and is committed to adherence to all applicable laws and regulations and to not breaching any applicable law or regulation. Each Employee must comply with the letter and spirit of any applicable law, this Code and any applicable Nido policies, procedures and guidelines and not knowingly participate in any illegal or unethical activity.

21.0 BREACH OF THIS CODE

Nido emphasises the need for all Employees to comply with the requirements of this Code. Where an Employee is uncertain whether conduct or an action, they intend to take may contravene the Code, the Employee should consult their manager or People and Culture, or if a third party, the Managing Director. Any Employee found to be in breach of the requirements of this Code may be subject to disciplinary action, up to and including the termination of their employment. Employees should refer to the relevant Nido procedures for further information on disciplinary action.

This Code is a best practice procedure and does not create any binding obligations on Nido or contractual rights for Employees. The Company may vary the Code from time to time at their discretion.

22.0 REPORTING OF UNLAWFUL AND UNETHICAL BEHAVIOUR

Nido expects Employees to report (in good faith) any actual or suspected violation of this Code, any of Nido's policies or any behaviour that is illegal, unethical, fraudulent, or deceptive by Employees ("**Reportable Behaviour**") and to encourage others to do the same.

If employees wish to make a report anonymously, the Nido **Whistleblower Policy** sets out the confidential reporting systems in place.

Employees may use their own judgment in deciding to whom to report any Reportable Behaviour, however members of the Executive Leadership team are encouraged to report to another member of the Executive Leadership Team or the Chairperson of the relevant Board and employees are encouraged to report to their immediate manager or a member of the People team.

A person to whom a report is made of Reportable Behaviour must ensure:

- that a proper and thorough investigation is conducted;
- that any person the subject of an investigation is given a reasonable chance to respond to allegations (ensuring confidentiality of the reporting person is preserved); and
- that appropriate disciplinary action is taken if the allegation is substantiated.

If an Employee ("**Reporting Person**") reports Reportable Behaviour in good faith, each Employee must ensure:

- that the Reporting Person's position of employment is protected; that their identity is only disclosed with their consent (except where disclosure is required by law); and
- that no disciplinary or discriminatory action is taken or tolerated against the reporting person for reporting the violation.

The Reporting Person is not protected from civil or criminal liability for any of his or her conduct that may be revealed by an investigation, however in some cases the fact the Reporting Person has made a report may take into account as a mitigating factor when determining actions that may be taken against him or her.

The *Corporations Act 2001* (Cth) provides additional protections in relation to the reporting of a possible contravention of the Corporations legislation.

23.0 APPROVED VARIATIONS

There are no approved variations to this base policy.

24.0 VERSION CONTROL

LIVE DATE	JANUARY 2025	REVIEWED DATE	JANUARY 2025
REVIEW DATE	JANUARY 2027		
PREPARED BY:	PEOPLE TEAM		
VERSION	V0.1		

Have feedback? Scan the QR code below or [Click Here](#) to share your thoughts.

