



CODE OF CONDUCT

Applies to: All employees, including permanent, casual, and on-hire/agency personnel.

1. Purpose

This Code of Conduct (the "Code") establishes the fundamental ethical and professional standards that Altaira requires of all its employees. As an on-hire and recruitment company specialising in healthcare, our reputation and the trust of our Clients, Candidates, and the individuals they serve (Patients/Residents/Clients) depend entirely on the integrity of our workforce.

This Code affirms Altaira's commitment to responsible social and ethical behaviour and clarifies the required standards of conduct when interacting with the Business, colleagues, Clients, suppliers, and members of the public, particularly those receiving health services.

2. Core Principles

Our employees are the foundation of our success. Every employee has an obligation to the Business, our Clients, and themselves to uphold the highest standards of integrity, professional conduct, and fair dealing.

In all activities, employees must:

1. Act Professionally: Maintain a high standard of integrity, professionalism, and competence.
2. Ensure Safety and Dignity: Prioritise the safety, well-being, and dignity of all people, particularly those receiving care services.
3. Respect and Equality: Exercise fairness, equality, courtesy, consideration, and sensitivity in all interactions, free from harassment or discrimination.
4. Comply with Law: Adhere to all applicable legislation, regulations, and industrial instruments. Where this Code conflicts with the law, the law takes precedence.

3. Standards of Conduct

Under this policy, employees are obliged to uphold the following standards:

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3.1 Respect, Equality, and Non-Discrimination

Employees must ensure the working environment is free from all forms of discrimination, harassment, bullying, and victimisation. This includes, but is not limited to:

- Treating all colleagues, Clients, Candidates, and service users with respect, courtesy, and consideration, regardless of background, role, or personal characteristics.
- Actively contributing to a trauma-informed and intersectional approach to workplace interactions, ensuring sensitivity and understanding toward diverse experiences.
- Ensuring the working environment is free from sexual harassment.

3.2 Professionalism and Service Delivery

For all Employees:

- Perform duties with skill, honesty, care, and diligence.
- Abide by all Altaira policies and procedures.
- Abide by all lawful directions given by Altaira management.

For On-Hire Employees at Client Sites:

- You are required to adhere to the policies, procedures, and lawful directions of both Altaira and the Client site (e.g., Hospital, Aged Care Facility).
- Any breach of a Client's policy or procedure may constitute a breach of this Code and result in disciplinary action.

3.3 Confidentiality and Privacy

Given the sensitive nature of healthcare, maintaining confidentiality is paramount.

- Confidential Information: Be scrupulous in the proper use and security of all Company, Client, Candidate, and Patient information, including digital and verbal communications.
- Resident Privacy: Strict adherence to all privacy legislation is mandatory. Employees must only access or disclose personal health information necessary to perform their duties and must never discuss or share private information outside of the required professional setting.

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- **Data Security:** Maintain the security of Company and Client digital information, equipment, and facilities. Passwords and access credentials must be protected at all times.

3.4 Professional Boundaries and Conflicts of Interest

- **Professional Boundaries:** Employees must maintain clear, professional boundaries with Patients, Residents, Clients, and Candidates at all times. This includes avoiding any personal, social, or financial relationship that could compromise professional judgement or exploit the vulnerability of a service user.
 - **Examples of Boundary Breaches (Forbidden):**
 - Engaging in personal relationships with Patients/Residents/Clients while delivering care or services.
 - Accepting large gifts, bequests, or loans from service users or their family members.
 - Adding service users or candidates as "friends" or "followers" on personal social media accounts.
 - Using service user funds or property for personal benefit (e.g., running errands unrelated to care without specific, documented authorisation).
 - Sharing personal details or problems with service users that shift the focus of the relationship from professional care to personal support.
- **Conflict of Interest:** Avoid any actual, apparent, or perceived conflict of interest. Employees must promptly disclose to their direct manager at Altaira any interest (financial, personal, or otherwise) which may constitute a conflict of interest with Altaira or its Clients.
- **Gifts, Benefits, and Hospitality:** Employees must never offer or accept money in connection with business transactions. Avoid the perception that any business transaction may be influenced by offering or accepting gifts. Gifts or hospitality of a nominal value (e.g., low-cost promotional items) may be accepted, but anything of significant value must be immediately reported to and approved by a Manager.

3.5 Use of Resources and Digital Conduct

- **Company Resources:** Be responsible and efficient in the proper use of Altaira's and the Client's funds, equipment, facilities, and time.

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- Digital Communication Protocols: Employees must adhere to the digital communication policies of the Client site. Personal mobile phone use for non-work purposes is strictly prohibited in clinical areas. Never use a personal device to store or transmit patient data.
- Social Media: All employees must exercise professional judgement in their personal and professional online activities. Do not post content, images, or comments that:
 - Identify Clients or Patients, even if their names are not used.
 - Bring Altaira or its Clients into disrepute.
 - Disclose confidential information.
 - Are discriminatory, harassing, or bullying towards others.

4. Reporting Breaches and Mandatory Reporting

Altaira is committed to investigating all suspected breaches of this Code in a fair, timely, and confidential manner.

4.1 Reporting Concerns (Internal)

- Seeking Guidance: Should an employee have doubts about any aspect of the Code of Conduct or the appropriate action in a situation, they must seek immediate clarification from their direct Manager or a senior Manager.
- Reporting Breaches: Any employee who believes the Code has been breached, or has witnessed unlawful or unethical behaviour, is obliged to report it immediately.
 - Procedure: Reports should be made to your direct Altaira Manager, or if the Manager is involved in the alleged breach, to a Senior Manager or Human Resources.

4.2 Mandatory Reporting (External/Legal Obligation)

Employees must understand and comply with all legal obligations concerning the reporting of abuse, neglect, or harm. This duty supersedes any other non-disclosure agreement or confidentiality clause.

- Reporting Risks: Employees must immediately report any reasonable suspicion or observation of abuse, neglect, or harm to a Patient, Resident, or Client to the immediate supervising manager at the Client site and to Altaira management.

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- Reportable Conduct: This includes, but is not limited to, suspected elder abuse, child protection concerns, or serious misconduct involving professional boundary breaches.
- Follow Client Procedures: On-hire staff must ensure they follow the Client's site-specific mandatory reporting protocols while also informing Altaira.

4.3 Non-Retaliation (Whistleblower Protection)

Any employee who, in good faith, raises a complaint or discloses an alleged breach of the Code, whilst following correct reporting procedures, will be protected from disadvantage or prejudice. Retaliation against a person who reports a concern in good faith is a serious breach of this Code and will result in disciplinary action.

5. Consequences of a Breach

Any employee found to be in breach of this policy may be subject to disciplinary action, up to and including immediate termination of employment. Serious breaches may also be reported to relevant professional bodies or law enforcement agencies.

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