

# Policy GOV.003

## Code of Conduct

*Carry On (Victoria) Ltd and its subsidiaries. Operating as Veteran Housing Australia (VHA).*

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## 1 Purpose

Members and the broader community have particular expectations about the way in which Veteran Housing Australia operates.

The objectives of this policy are to guide behaviour, enhance stakeholder confidence and to demonstrate the commitment of Veteran Housing Australia to ethical standards and practices.

This policy applies to all Directors and all executives (Officers) of Veteran Housing Australia.

## 2 Policy Responsibility

*Company Secretary* – Maintenance of this policy and ensuring it is presented for review by the Board on a regular basis.

*Board* – Review and approval of this policy.

*Directors* – Actively invest their time and effort in accountability to the requirements of the policy.

## 3 Standard of Behaviour

All Directors and all Officers of Veteran Housing Australia must, as far as possible, act with the utmost integrity and objectivity, striving at all times to enhance the reputation and performance of Veteran Housing Australia and to uphold public confidence in charities, particularly those operating in the veteran space.

The Directors and Officers of Veteran Housing Australia must act in the best interests of Veteran Housing Australia and all its members and, to the extent consistent with its primary duty, also take into account the interests of staff, clients, funders and all other stakeholders in Veteran Housing Australia.

If a Director or Officer becomes aware of unlawful or unethical behaviour, he or she will report it to the Chair immediately. The identity of the Director or Officer reporting the violation in good faith will remain confidential.

## 4 Interests of legitimate stakeholders

In making decisions on behalf of Veteran Housing Australia, Directors and Officers will respect and have regard to the bona fide interests of legitimate stakeholders in Veteran Housing Australia, including its members, employees, clients, partners and suppliers.

Veteran Housing Australia will not knowingly infringe the legal rights of legitimate stakeholders and will take reasonable steps to minimise the risk of doing so unintentionally.

## 5 Whistleblowing

It is the responsibility of all Directors, Officers, employees, and volunteers to report violations in accordance with this policy.

The Board takes responsibility to enquire and take appropriate action in relation to all bona fide complaints or allegations which indicate that there may be illegal or unethical conduct by Veteran Housing Australia or any of its Directors, Officers, volunteers or employees.

Staff are required to report suspected violations to the CEO, which has specific responsibility to investigate all reported violations. The CEO will make themselves available as the initial point of contact for all persons lodging such complaints or allegations and will inform the Board of such complaints and allegations.

If a complaint relates to the CEO, or the person making the complaint or allegation is uncomfortable, for any reason, with making the complaint or allegation to the CEO, then the Chair will receive and deal with the complaint or allegation.

The CEO is responsible for investigating and resolving all reported complaints and allegations concerning violations and, at shall keep the Board apprised of the state of all investigations.

For suspected fraud, or when an employee, Officer, volunteer, or Director is not satisfied or is uncomfortable with following Veteran Housing Australia open door policy, individuals should contact the Chair directly.

Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offence.

The person making a complaint or allegations will, in all circumstances, be treated with respect and anonymity, except to the extent that they agree to having their identity disclosed for the purposes of enquiring into the complaint or allegation.

The CEO (or otherwise) will notify the sender and acknowledge receipt of the reported violation or suspected violation within 5 business days. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.

No Director, Officer, employee or volunteer who in good faith reports a violation shall suffer harassment, retaliation or adverse employment consequences. A Director, Officer, employee or volunteer who retaliates against someone who has reported a violation in good faith is subject to disciplinary action up to and including termination of directorship, employment or volunteer privileges.

## 6 Conflict of interest

Directors and Officers are not to give preference to personal interests or to the interests of any other person or organisation, where to do so would be in conflict with the interests of Veteran Housing Australia. Personal and other dealings should be kept separate from dealings in their capacity as representatives of Veteran Housing Australia.

Any conflicts of interest must be disclosed to the Board.

## 7 Use of information in position

Directors and Officers must not misuse information, their position or opportunities arising as a result of their position, improperly gain advantage for themselves or for someone else or to cause detriment or to compete with Veteran Housing Australia. Directors and Officers must not use the name of Veteran Housing Australia to further any personal or other business transaction for their personal benefit.

## 8 Use of VHA property

Directors and Officers must not use property or opportunities arising from property, improperly to gain advantage for themselves or for someone else or to cause detriment to or compete with Veteran Housing Australia.

Directors and Officers have a duty to account to Veteran Housing Australia for business opportunities which arise as a result of their role in Veteran Housing Australia and to use Veteran Housing Australia resources only for the benefit of Veteran Housing Australia.

Directors and Officers must take reasonable steps to protect Veteran Housing Australia assets and ensure all such assets are used efficiently and for business purposes only.

## 9 Proper purpose

Directors and Officers are to use their powers for a proper corporate purpose and whilst Directors and Officers have a primary responsibility to Veteran Housing Australia, regard should also be had to other relevant interests.

## 10 Confidentiality

Confidential information received by a Director or Officer in the course of his or her duties remains the property of Veteran Housing Australia and should not be disclosed to any other person unless the disclosure is required by law or in accordance with their duties as a Director or Officer of Veteran Housing Australia.

Directors and Officers should respect the privacy of others.

Directors and Officers must protect proprietary, commercial and other information that is confidential to Veteran Housing Australia. These obligations continue after the Director's or Officer's engagement with Veteran Housing Australia ends.

## 11 Fair dealing

Directors and Officers must act fairly and honestly in all their dealings with and for Veteran Housing Australia. Business relationships must be maintained in a way which is consistent with the principles of respect for others and fairness.

## 12 Compliance with the law

Directors and Officers should comply with the letter and, where it is clear, the spirit of all laws and regulations relating to their business conduct to the best of their abilities. This includes understanding the laws and regulations relevant to their work. The laws that govern Veteran Housing Australia activity may be complex, but ignorance of the laws does not excuse Directors and Officers from their obligations to comply.

Directors and Officers should not engage in conduct likely to have an adverse effect on the reputation of Veteran Housing Australia.

## 13 Political contributions and activities

Veteran Housing Australia maintains a position of impartiality with respect to party politics. Accordingly, Veteran Housing Australia does not contribute funds to any political party, politician, or candidate for public office.

Veteran Housing Australia does not prohibit Directors or Officers from making personal political contributions but they should not use their role with Veteran Housing Australia for political interests at any time.

## 14 General behaviour

Directors and Officers are expected to conduct themselves in a professional manner which includes avoiding speech and behaviour that may be offensive or demeaning.

Directors and Officers are to model leadership behaviours that are respectful and considerate at all times.

## 15 Review & Approval

Action	Date
1 <sup>st</sup> Issue	2022
Reviewed	April 2026
Next Review	April 2027