

Cambridge Boxhill Language Assessment Pty Ltd (CBLA) Code of Conduct





Contents

03	Organisation Vision & Mission	09	7.1 Bribery & Improper Advantages
04	1. Purpose of CBLA Code of Conduct	09	7.2 Accurate Reporting
05	2. Scope	09	7.3 Taxes
05	3. The CBLA Code and the Law	10	7.4 Quality Standards & Good Practices
06	4. Our Values	11	8. Data Privacy
07	5. Code of Conduct Commitment	12	9. Employment at CBLA
07	5.1 Uphold the integrity and reputation of CBLA by ensuring that my professional and personal conduct is demonstrably consistent with CBLA's values and standards.	12	9.1 Discrimination & Harassment
07	5.2 Treat all people with respect and dignity and challenge any form of harassment, discrimination, intimidation, exploitation or abuse.	12	9.2 Safety, Security, Health & Environment
07	5.3 Be responsible for the use of information, equipment, money and resources to which I have access by reason of my employment with CBLA.	12	9.3 CBLA Confidentiality
07	5.4 Protect the health, safety and welfare of all CBLA employees, contractors and any other stakeholders.	12	9.4 External Communication & Public Comment
07	5.5 Personnel Integrity and Conflict of Interest	12	10. Breach of the Code of Conduct
08	6. Responsible Conduct	13	11. Raising Concerns
09	7. Business Integrity	13	11.1 Ethical Conduct & Company Culture
		14	12. Definitions
		15.	13. Code of Conduct Agreement



Organisation Vision & Mission

Our Vision

To connect the world to better healthcare.

Our Mission

We set the benchmark for global healthcare communication skills through industry-wide collaboration, so that work-ready healthcare professionals can be wherever they are needed.



1. Organisation Vision & Mission

The CBLA Code of Conduct (the CBLA Code) is one of the elements that connects us together.

The CBLA Code:

- states who we are at CBLA and how we conduct ourselves in our work;¹
- represents the CBLA organisational culture, mission and vision;
- is a tool to provide guidance during your engagement with CBLA, to understand and uphold CBLA values; and
- helps CBLA Employees and CBLA Personnel to navigate what to do when a situation is complex or during an ethical dilemma, by providing standards and values for you to follow, to protect against situations that may result in damage you or CBLA. It also seeks to ensure that CBLA personnel avoid using possible unequal power relationships for their own benefit.

The guidelines set out in this Code, together with CBLA policies, procedures and the terms and

conditions of your employment/ contract with CBLA, or engagement of service as a CBLA Board Member, provide a framework within which all CBLA personnel, regardless of location, undertake to discharge their duties and to regulate their conduct.

At CBLA our purpose is to:

- improve global healthcare services by helping healthcare professionals change life;
- enhance the lives of patients and healthcare professionals; and
- create a sustainable enterprise where all stakeholders enjoy long term success.

In accepting your appointment to CBLA, you undertake to discharge your duties and to regulate your conduct in accordance with the requirements of this Code, thereby contributing to CBLA quality of performance and reputation.

The Code describes what CBLA expects from its employees and what the employees can expect from CBLA.

¹ CBLA includes the CBLA Group.



2. Scope

The CBLA Code:

- applies to the CBLA Group of companies and CBLA personnel; and
- adheres to international human rights law.

When read in conjunction with the CBLA values, the CBLA Code of Conduct (the Code) is designed to support our strategy, by addressing specific areas of our business where it is particularly important for us to understand what those high standards mean. The CBLA Code supplements our legal, fiduciary and contractual obligations in areas such as: Occupational Health and Safety, Equal Opportunity, Anti-Discrimination, Data Governance & Privacy and Good Corporate Governance.

3. The CBLA Code and the Law

CBLA personnel are required to adhere to the Code and applicable laws, rules and regulations.

In circumstances where a provision of the Code conflicts with applicable laws, the law is paramount. If at any time you are uncertain what laws apply to you, or if you believe there may be a conflict between different applicable laws, you should consult the Head of Legal.

CBLA Personnel have a duty to adhere to their individual Terms of Employment / Engagement and have an ongoing duty of disclosure.



4. Our Values

As a CBLA employee, I undertake to adhere to CBLA's core values:



Excellence, always



Communicate openly



Inspired to innovate



I am because you are



One team, one mission

5. Code of Conduct Commitment

As a CBLA employee, I will:

5.1 Uphold the integrity and reputation of CBLA by ensuring that my professional and personal conduct is demonstrably consistent with CBLA's values and standards.

I will seek to maintain and enhance public confidence in CBLA by being accountable for my professional and personal actions.

Whilst observing the requirements of the CBLA Code of Conduct, I will also be sensitive to, and respectful of, local customs and culture, even if the norms and values in that cultural context differ from the Code of Conduct.

I will if necessary, seek (and will receive) support and advice from CBLA.

I will be fit and well enough to do my job, not be under the influence of alcohol or drugs, or use alcohol or illegal drugs while at work.

5.2 Treat all people with respect and dignity and challenge any form of harassment, discrimination, intimidation, exploitation or abuse.

I will respect all peoples' rights, and I will contribute to a working environment characterised by mutual respect, integrity, dignity and non-discrimination.

I will use my best endeavours to report any such conducts or malpractice in the workplace by others to my line manager or through recognised confidential reporting systems.

5.3 Be responsible for the use of information, equipment, money and resources to which I have access by reason of my employment with CBLA.

I will use my discretion when handling sensitive or confidential information.

I will seek authorisation before communicating externally in CBLA's name and will avoid any unintended detrimental repercussions for me or CBLA.

I will appropriately account for all CBLA money and property (e.g. office equipment, CBLA provided accommodation, mobile devices, computers including the use of internet, email and intranet).

5.4 Protect the health, safety and welfare of all CBLA employees, contractors and any other stakeholders.

I undertake to assist with CBLA risk assessments and take all reasonable steps to avoid risk to the safety, health and welfare of myself and others, including partner organisations and subsidiaries.

5.5 Personnel Integrity and Conflict of Interest

Conflicts of interest are an inevitable fact of organisational life and may arise without anyone being at fault.

Personal interests must not unduly influence our professional judgment.

We should not unduly use our position at CBLA for personal gain that is inconsistent with work-related duties, or to benefit relatives or close associates. We should not take part in, appear to take part in, or exert influence on any decision that may put our own interest in conflict with the best interest of CBLA.

You must not undertake any appointment, position or work during your employment with the employer without the prior written consent of the employer. Such consent will not be unreasonably withheld.

6. Responsible Conduct

It is a condition of employment to adhere to the CBLA Code of Conduct.

If ever in doubt about a course of conduct, ask yourself:

- Is it consistent with the Code?
- Is it ethical?
- Is it legal?
- Will it reflect well on me and CBLA?
- Would I want to see a story about this on social media?

If the answer is “no” to any of these questions, do not do it.

If you are still uncertain, ask for guidance from your Line Manager or the People & Culture Team.



7. Business Integrity

Every CBLA employee contributes to CBLA's integrity as a company on a worldwide basis; employee misconduct in one country may have negative implications for CBLA globally.

We are all expected to:

- Adhere to all applicable laws and regulations as well as to the high integrity standards as set forth by CBLA.
- Assess carefully, on a case-by-case basis, whether our business conduct complies with CBLA's expectations and standards of business integrity.

7.1 Bribery & Improper Advantages

We do not tolerate bribery or any other form of corrupt business conduct.

CBLA rejects all forms of corrupt business conduct, such as bribery (public, private, active and passive), embezzlement, fraud, theft and the granting of improper advantages.

Bribery

We are all expected to follow these basic principles:

- do not offer, promise or give a bribe to seek financial or other advantage for CBLA;
- do not request, agree to receive, or accept a bribe from any person or organisation, for any purpose; and
- do not require, assist, or encourage any third party or anyone else to make such payments on your behalf.

Bribery, corruption, and fraud by staff will be treated as a serious disciplinary offence which would most likely result in dismissal and legal action.

7.2 Accurate Reporting

Data integrity is key to our business.

We ensure that any data, information or records which we create, or for which we are responsible, are true and fair. These can take many forms, ranging from the Finance Reports, research and development data, to our personal travel and expense claims or even our emails.

CBLA Personnel must adhere to applicable laws, internal accounting and reporting guidelines and external financial and non-financial reporting standards and ensure that the information it supplies to its stakeholders, such as auditors, regulatory agencies and government bodies is accurate.

Falsifying records and accounts or misrepresenting facts may constitute fraud. CBLA employees who engage in such illegal conduct may be subject to severe penalties.

We must never make a false or misleading statement or entry in any report, publication record or expense claim.

We are all expected to:

- make sure information we create or report is true, fair and complete; and
- never misrepresent facts in any CBLA report, publication, record or other document.

7.3 Taxes

We strive to remain a fair and respected taxpayer in the countries where we operate.

CBLA operates around the globe and it is our obligation to comply with the tax requirements in any country where we operate.

In particular cases, CBLA and the respective tax authority may disagree on the correct application of local tax law. In some cases, there may be inconsistencies between tax authorities of different countries or even between national authorities within the same country as e.g. customs and tax laws are not always aligned and consistent. In the event of disputes, CBLA contributes in a positive spirit to find balanced solutions in accordance with the applicable laws.

We are all expected to:

- comply with the tax laws in the countries where we operate;
- comply with Accounting Standards; and
- contribute actively and positively to solutions in the event of conflicts with local tax authorities or between national authorities.

7.4 Quality Standards & Good Practices

Maintaining high-quality standards is essential for our business. Quality is every employee's responsibility. Quality is ingrained in everything we do, from concept through to continuous improvement. CBLA is committed to complying with legal and regulatory requirements, internationally acknowledged good practices and to meeting the high expectations of its stakeholders regarding the quality and efficacy of its products and services.

CBLA has established a quality system including sets of policies and procedures that employees must follow. In addition, employees must report any deviations from our policies to their Line Management or the Legal Team.

CBLA expects that its business partners also adhere to CBLA's standards.

We are all expected to:

- Comply with CBLA policies and procedures.
- Ensure that our vendors adhere to CBLA's agreements.

8. Data Privacy

The right to privacy is a fundamental human right.

The protection and responsible use of personal data is reflected in our daily operations.

We use and process personal data with due care, and adhere at all times with applicable privacy laws.

We are committed to collecting and using data in a lawful, fair, legitimate and ethical way, and will always respect the privacy of individuals in order to earn and deserve their trust.

CBLA assumes accountability for the compliant processing of personal data by itself or by its trusted service and cooperation partners.

Any information related to an identified or identifiable person must be collected and processed in compliance with applicable data privacy laws. Refer to CBLA Privacy and Data Governance Policy.

We are all expected to:

- Collect, use and store data in compliance with applicable laws, privacy principles and CBLA's Privacy and Data Governance Policy.
- Respect each individual's right to privacy at all times.
- Never re-identify or attempt to re-identify anonymised data.
- Carefully select the third parties we're trusting to process or access personal data which we are responsible for, and enter into the right contract.

9. Employment at CBLA

9.1 Discrimination & Harassment

We value diversity and inclusion as part of an inspiring working environment.

Diversity requires careful leadership to avoid misunderstandings and conflicts, and to exploit the full value of diversity.

At CBLA we value and manage diversity through an inclusive environment.

CBLA is committed to fair and equal treatment of all employees and all people who seek employment at CBLA, including equal opportunity for development and advancement. We do not tolerate any form of discrimination or harassment in the workplace.

There is no tolerance of employees being subjected to offensive, abusive or other unwanted conduct at the workplace which violates the personal dignity of the victim or creates an intimidating, hostile or humiliating environment for the victim (e.g. physical, sexual, psychological, verbal or any other form of harassment). It is CBLA's policy to ensure that the conduct of its employees does not discriminate against anyone on the grounds of gender, age, ethnicity, national origin, religion, disability, diagnosis, sexual orientation, citizenship, genetic information, their abilities or any other relevant characteristic protected under the applicable law.

CBLA does not tolerate workplace gossip and such conduct breaches this Code. Workplace gossip is informal chatter about work colleagues, CBLA stakeholders and/or their acquaintances.

These principles apply to all aspects of the employment relationship, such as hiring, assignments, promotion, compensation, discipline and termination.

If we believe that anybody has been subjected to discrimination or harassment, we should report this misconduct.

9.2 Safety, Security, Health and Environment

We promote and provide safe, secure and healthy workplaces and a clean environment.

CBLA's operations are conducted in compliance with applicable health, security, safety and environmental laws and regulations, company standards and best practices. We take all reasonable and practical steps to ensure that we provide a safe, secure, healthy and clean working environment.

We strive for continuous improvement wherever possible and economically viable. We proactively seek to employ new, more sustainable technologies and processes to minimise our impact on people and the environment. We continuously develop our products and services for improved sustainability. We initiate and implement initiatives to reduce resource consumption, waste generation and environmental pollution, and to address global warming and climate change.

Every employee is personally responsible for safety, security, health and environmental protection at the workplace to the full extent required by their duties to the best of their knowledge, ability and experience.

We are all encouraged to identify areas for improvements and continuously work towards improved safety and a better environment.

We are all expected to:

- Ensure safety and security, and protect health and the environment at our workplace to the best of our knowledge, ability and experience.
- Integrate considerations regarding safety, security, health and environment into our daily work.
- Stop our work when it is not safe².

² Refer to the CBLA OH&S Policy for more information.

9.3 CBLA Confidentiality

CBLA Personnel are expected to respect personal privacy and confidentiality.

CBLA confidential information requires special treatment and protection.

Internal or external stakeholders who provide confidential information to CBLA have the right to expect this information will be treated as confidential.

CBLA Personnel with access to confidential information must ensure it remains confidential, and at all times act in accordance with CBLA policies and procedures.

“Confidential Information” includes, but is not limited to, the following:

- personal information as defined in applicable privacy laws including the Privacy Act 1988 (Cth);
- trade secrets of the CBLA Group;
- information about the business and affairs of the CBLA Group;
- information about customers of the CBLA Group;
- customer names and addresses, customer lists, business cards and diaries, calendars or schedules;
- computer databases and computer software; and
- all other information obtained from the CBLA Group or obtained in the course of your employment with CBLA, that is by its nature confidential.

CBLA Personnel must not, at any time during or after the termination of their employment for any reason, directly or indirectly disclose or use (or attempt to disclose or use) any confidential information which is inconsistent with their CBLA duties or express terms of engagement.

9.4 External Communication & Public Comment

All media or public comment enquiries are to be referred directly to the Global Head of Commercial and the Head of Legal.

CBLA employees may only make public comment (whether on social media, or other publication) when specifically authorised to do so in performance of their CBLA duties, or CBLA policies and procedures. Such comment is restricted to factual information and avoids the expression of personal or political opinion.

Public comment includes speaking engagements and providing information or comment through any media, including social media. When making a comment in a private capacity, CBLA employees must make it clear they are expressing their own view. CBLA employees must also ensure that personal comments do not compromise their or others’ capacity to perform in an unbiased manner, and that their comments are not seen or perceived to be an official comment.

10. Breach of the Code of Conduct

CBLA treats breaches of this Code seriously.

All CBLA personnel have a responsibility to act consistently with this Code.

Failure to comply with the expectations set out in this Code may lead to disciplinary action or termination of employment as a CBLA personnel.

CBLA Personnel who breach the Code may be reprimanded, and/or required to participate

in performance management and training, dismissed, or in some cases subject to legal action.

If you witness any breach to the CBLA Code or its respective policies (e.g. Anti-Bullying, Sexual Harrassment, Respectful Workplace and Health, Safety and Wellbeing Policy) please contact a CBLA Equal Opportunity Officer.

11. Raising Concerns

If you have a serious concern regarding any aspect of your work, the conduct of others or our organisation's operations, you should report your concerns to a CBLA Equal Opportunity Officer in accordance with the CBLA Staff Grievance Policy. This will allow CBLA to deal with the issue and correct it, ideally before it becomes a violation of law or a risk to health, security or CBLA's reputation.

Your Line Manager is usually the first point of contact for reporting concerns, however, there may be occasions when speaking to your Manager may not be appropriate. In these instances, you may raise your concerns in confidence (or anonymously) with the Equal Opportunity Officer.

CBLA takes all reports of possible misconduct seriously. We will investigate the matter confidentially, make a determination about whether the Code or the law has been broken, and take appropriate corrective action.

Any breach of these lawful and reasonable directions will be treated very seriously by CBLA and will lead to disciplinary action, which could include termination of your employment.

Making False Accusations

It is a violation of the CBLA Code to knowingly make a false accusation, lie to investigators, or interfere or refuse to cooperate with an investigation.

11.1 Ethical Conduct & Company Culture

CBLA has a robust corporate culture which encourages 'self-correcting' conduct.

CBLA Board and Management are responsible for overseeing the development and implementation of systems and processes which facilitate CBLA's ethical culture.



12. Definitions

TERMS	DEFINITIONS
Bribe	An advantage or benefit of value (which need not be cash) offered, promised, or given to someone in order to obtain a commercial advantage, or to induce the recipient to, or reward the recipient for acting improperly or where it would be improper for the recipient to accept the benefit. Bribes can take many forms, including facilitation payments which are payments given to an official to encourage the performance or speed up the performance of an existing duty.
Corruption	The misuse of entrusted power for private gain.

TERMS	DEFINITIONS
CBLA Personnel	All directors, staff and employees of the CBLA Group, and all persons performing work at the direction of, in connection with, or on behalf of CBLA (for example stakeholders, agency on-hire staff, contractors, subcontractors, agents, consultants, and temporary staff).
Executive	Team typically made up of the CEOs direct reports.
Fraud	The use of deception or intentional misrepresentation to obtain an unjust or illegal financial advantage or deprive CBLA of any value or property.
Conflict of Interest	A conflict of interest is a situation in which a person or organisation is involved in multiple interests, financial or otherwise, and serving one interest could involve working against another.

13. Code of Conduct Agreement

All CBLA Personnel are bound by this Code of Conduct.





Cambridge Boxhill Language Assessment Pty Ltd (CBLA) Code of Conduct

Owner: CEO

Authors: Head of Legal, Manager
Risk and Compliance

Version: 2.0

Approved By: Board

Status: Approved

Date: October 2021

ALL PRINTED COPIES ARE UNCONTROLLED.

