



CEACA
Supporting Wheatbelt Communities

CEACA Limited Code of Conduct

Document Code	CEACA-PP-003 (SPV)		
Policy Hierarchy	Governance		
Policy Owner	Board of Directors		
Document Owner	Operations Manager		
Current Version	Approved By	Date Approved	Date Effective
1.0	Board of Directors	27/01/2026	27/01/2026
Document Review Date: 27/01/2029			

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1.0 PURPOSE

The Code of Conduct (the Code) outlines the standard of behaviour and appropriate conduct expected of all Staff and representatives of CEACA.

2.0 SCOPE

The Code applies to Staff, Directors and representatives of CEACA in all workplace interactions and at work related events. Staff, Directors and representatives are required to act in accordance with this Code, adhere to all relevant CEACA policies and procedures, their contract of employment, relevant legislation and consider the CEACA values in determining what constitutes appropriate conduct in the workplace. For the purpose of this policy:

Staff:

- CEACA operational staff, contractors or sub-contractors, consultants, labour hire employees, apprentices or trainees and volunteers involved with the activities of CEACA.

Directors:

- CEACA Directors, including the Chairperson.

External Contacts:

- Stakeholders, competitors, visitors, tenants, clients, guests, customers, or partners of CEACA.

3.0 RESPONSIBILITIES

This document allocates responsibilities for staff and Directors.

4.0 POLICY STATEMENT

CEACA recognises that a positive internal work environment and developing strong working relationships with our external contacts and communities cannot be achieved without appropriate conduct being displayed, encouraged and enforced amongst staff and Directors.

5.0 CODE OF CONDUCT

All Directors and staff must abide by the Code and understand that breaches may result in disciplinary action up to, and including, dismissal or cancellation of contract as per *Section 6.0*.

5.1 FAIR, SAFE AND ETHICAL ENVIRONMENT

CEACA Ltd has a responsibility to provide a safe, encouraging and supportive work environment that recognises and values diversity, abilities and contributions of Staff. The Staff are entitled to be treated with respect and work in an environment free from discrimination, harassment, bullying or vilification. Equally, Staff have a responsibility to act with integrity, honesty, transparency and impartiality in their dealings with colleagues, external contacts, stakeholders and members of the wider community.

Staff must perform their duties in a safe and competent manner in accordance with relevant Occupational Safety and Health legislation and CEACA Ltd policies and procedures.

- Take care not to put themselves or other Staff at risk or reduce their ability to perform their duties through unsafe practices and inappropriate behavior.
- Act in the interests of CEACA Ltd, honestly and in good faith.
- Use care and diligence in fulfilling their role and in exercising the responsibilities attached to that role.
- Act with honesty and integrity during employment or engagement with CEACA Ltd.
- Comply with all applicable legislation and the reasonable and lawful directions of CEACA Ltd.

- Report any known or suspected instances of inappropriate, dishonest or fraudulent conduct to appropriate Directors.
- Report unlawful or unethical behaviour.

Staff must not victimise those who report unethical behaviour.

- Engage in improper and dishonest activity designed to benefit themselves to the financial or other detriment of CEACA Ltd, such as theft, corruption and falsification of documentation or other fraudulent activity.
- Engage in any other dishonest activity that damages their relationship with CEACA Ltd.

5.2 COMPLIANCE WITH THE LAW

Staff must:

- Comply with the laws, regulations and Codes relevant to their duties including providing a safe psycho-social environment.
- Advise the Directors if charged with a criminal offence which is punishable by imprisonment or, if found guilty, could reasonably be seen to affect their ability to meet the inherent requirements of the work they are engaged to perform.

Staff must not:

- Engage in criminal activity in the workplace, during working hours or when using work equipment or dealing with external contacts.

5.2.1 OUTSIDE OF WORKING HOURS

Criminal activity outside of working hours may still be deemed a breach of the Code in circumstances including, but not limited to, where the crime:

- Impacts on their ability to fulfill the inherent requirements of their role.
- Damages the reputation of CEACA.
- Represents a conflict of interest.
- Is a breach of a CEACA policy or relevant legislative requirement.

5.3 INTERACTING WITH OTHERS, THE PUBLIC AND THE MEDIA

When interacting with others in the workplace or when representing staff must:

- Treat others with courtesy and respect during interactions at work (including online/electronic) and during all interactions related to work (including social activities).
- Consider how their conduct might reinforce inappropriate stereotypes based on gender, race, sexual orientation or any other discriminatory ground and refrain from such conduct.
- Act in accordance with CEACA values when in people/clients' residences and property.
- Comply with the CEACA Media Communications Policy when planning to speak to the media or if approached to speak to the media.
- Ensure that confidential information remains confidential unless it is determined by law or otherwise that the release of the information is appropriate.
- Communicate decisions, processes and any information that affects an individual or members of the public in an accurate and timely manner.

Staff must not:

- Make written or oral comments which infer to represent the views of CEACA, and which might reasonably be expected to become public, without the appropriate authority to do so.
- Discriminate against, harass, bully or victimise staff, external contacts or anyone else that they deal with in the course of their employment or engagement with CEACA.

5.4 PERSONAL CONDUCT

Staff are expected to conduct themselves in a professional manner throughout their course of employment or engagement with CEACA.

5.4.1 PERSONAL PRESENTATION

Staff are required to present themselves in a tidy and professional manner relevant to the nature of their employment, working environment, personal health and safety and level of interaction with external contacts and stakeholders.

5.4.2 WORK RELATED EVENTS

An appropriate standard of behaviour is expected from Directors and staff when attending all work-related events. Whether the event occurs on or off site and inside or outside of working hours, all CEACA policy and procedures apply.

5.4.3 BEHAVIOUR OUTSIDE OF WORK

Directors and Staff are encouraged to conduct themselves in a manner that is compatible with their duty of good faith with CEACA and not:

- Bring CEACA name into disrepute or damage their interests or reputation
- Damage the relationship of CEACA and/or external contacts.
- Impact their ability to perform duties safely whilst at work.

5.5 CONFLICT OF INTEREST

Directors and staff must:

- Actively prevent all conflicts of interest between their duties as a staff member of CEACA and their other/private interests, whether the conflict is actual, potential or perceived.
- Report any actual, potential or perceived conflicts of interest to the Directors.
- Ensure that they comply with the above conflict of interest obligations in all relevant circumstances including, but not limited:
 - Personal relationships.
 - Employment outside CEACA.
 - Recruitment and selection processes.
 - Supplier negotiations and agreements.

5.6 ACCEPTANCE OF GIFTS, BENEFITS AND HOSPITALITY

Staff have the responsibility to behave with integrity and impartiality. This includes responding appropriately to offers of gifts, benefits and hospitality from internal or external contacts. When accepting or offering gifts, benefits and hospitality Directors and staff are responsible to exercise judgement to ensure they are not placed in a position which is perceived to:

- Influence their business judgment.
- Contain any obligation on the recipient or donor.
- Be considered extravagant or excessive.
- Be considered a secret commission or questionable payment.
- Be influenced by any consideration of personal gain.

Staff must notify the Directors of any instances that have the potential to breach the conditions detailed and/or if they require clarity regarding what gifts are acceptable.

5.7 USE OF CEACA LTD PROPERTY

All CEACA property, including IT resources, must be used efficiently and in accordance with CEACA policies and procedures.

5.7.1 CEACA PROPERTY

Directors and staff must:

- Protect and take reasonable care in their use of CEACA property.
- Use CEACA property for the intended purpose only, unless otherwise authorised.
- Return all property belonging to CEACA on termination of employment or engagement.
- Report damaged or defective CEACA property and ensure that where the damage or defect is a danger to health and safety, action is taken to protect staff and others.

5.7.2 IT Resources

Directors and staff must:

- Use CEACA IT resources for predominately work purposes only.
- Limit personal use and comply with all relevant CEACA policies. Personal use must not interfere with their duties and be reasonable in all circumstances.
- Protect the confidentiality and security of CEACA IT resources and make all reasonable efforts to keep their passwords secure.

Directors and staff must not:

- Use CEACA IT resources to view, post, publish, print or distribute inappropriate material with pictures or content that might be deemed sexually explicit, unlawful, defamatory, offensive, discriminatory, damaging to the interests or reputation of CEACA or in any way inappropriate.
- Publish or share content via social media that may be deemed damaging to interests or reputation of CEACA or might offend, humiliate or adversely impact others.

5.8 CONFIDENTIALITY

Directors and staff must not disclose any confidential information to any person relating to CEACA or any organisation/person they encounter because of their employment or engagement with CEACA.

5.8.1 INTERNAL CONTACTS

CEACA recognises that relationships with internal contacts will lead to the sharing of business and personal information. All information gained or shared in this way must be respected and treated with confidentiality during and after each party's engagement or involvement with CEACA and with consideration for the rights and expectations of others.

5.8.2 External Contacts

Directors and staff must ensure that any personal or confidential information held relating to external contacts, in any form, will always remain the confidential property of CEACA and will not be disclosed to other parties without the permission of CEACA and the relevant external contact.

5.8.3 INTELLECTUAL PROPERTY

Information concerning the activities or proposed activities of CEACA is confidential and must not be used for any purpose other than valid CEACA requirements.

- During and after employment or engagement with CEACA, Directors and staff must not use any information pertaining to CEACA and its activities for personal gain or for the gain of others.
- Intellectual property developed during CEACA employment, engagement or association remains the property of CEACA.

5.8.4 INFORMATION AND SYSTEMS INTEGRITY

Directors and staff must ensure that corporate documents and/or sensitive and confidential information is stored and disposed of appropriately. Directors and Staff must use CEACA IT resources in a manner that does not compromise confidentiality or security considerations.

5.9 FINANCIAL REPORTING AND RISK

Directors or staff involved in financial reporting processes on behalf of CEACA must exercise diligence and good faith in preparation of information, ensuring:

- Financial reporting is accurate, timely and represents a true and fair view of performance.
- Maintenance of accurate and reliable records and reports in relation to all financial, accounting and internal controls are in place.
- Understanding and managing risk, including fraud risk, is fundamental to the business.
- Business risks are identified, assessed and managed to minimise the impact on CEACA and key stakeholders.

5.10 COMPLIANCE WITH THE CODE

CEACA will monitor compliance with this Code through processes including, but not limited to:

- Analysis of feedback from staff, Directors, external contacts and other stakeholders.
- Maintaining a robust internal audit program.

6.0 BREACHES OF THE CODE

6.1 REPORTING OF BREACHES

Directors and Staff must abide by the Code and understand that breaches may result in disciplinary or termination of contractual agreements

6.1.1 REPORTING OF BREACHES OF THE CODE

- Breaches of the Code must be reported to the Directors.
- If the alleged breach relates to the Chairperson or Chief Executive Officer, then the breach must be reported to the Board of Directors.
- CEACA will address any matter raised as per *Section 6.2*.
- If the situation involves a breach of legislation, the matter may also be referred to the appropriate agency for enforcement of the legislation.
- Individuals reporting a breach will not be disadvantaged or prejudiced if a breach is reported in good faith. The necessary confidentiality will be maintained.

6.2 ADDRESSING A POSSIBLE BREACH OF THE CODE

To promote and maintain the expected CEACA standards of conduct, it is important that any member of staff or Director who has a concern about the conduct of another member of staff or Director can raise their concern freely and without fear of intimidation or repercussion. To encourage staff and Directors to come forward with any concern, CEACA will:

- Consider all complaints seriously.
- Investigate formal complaints immediately.
- Take reasonable steps to ensure any member of Staff or Director who makes a complaint in good faith is protected against disadvantage, victimisation or discrimination.

6.2.1 FALSE REPORTS OF BREACHES

A false report of a breach exists if, upon investigation, those responsible for conducting the investigation form the opinion that the report is:

- Untrue.
- Frivolous.

- Made maliciously or with intent to harm a member of Staff or Director to whom the report was made against.
- Was not made in good faith.

CEACA may initiate disciplinary action against any individual responsible for making a false report. A false report may give rise to a breach of the Code by the individual who made the report.

7.0 ACCOUNTABILITIES

7.1 CEACA

CEACA, so far as is reasonably practicable, will endeavour to:

- Provide a safe and healthy working environment.
- Promote opportunities for fulfilment, job satisfaction and career development for staff.
- Provide directors and staff with training, resources and support to competently perform their roles.
- Adopt workplace practices that support the varying personal needs of staff and Directors, external contacts and the operational needs of the business.
- Promote equal opportunity for all staff and Directors and encourage an environment that is free from discrimination, harassment and violence.

7.2 DIRECTORS

Directors are responsible for:

- Ensuring the Code is read and understood by all staff.
- Ensuring staff receive a full induction of CEACA policy and procedures that are mandatory and specific to their role.
- Addressing any instances of non-compliance of the Code.
- Implementing training and awareness raising strategies regarding the Code when required.
- Role modelling expected standards as outlined in the Code.

7.3 STAFF

Staff are responsible to:

- Ensure that they have read and understood the Code agree to adhere to it.
- Demonstrate the behavioural expectations outlined in the Code.
- Report any instances of non-compliance of the Code.

8.0 RELATED DOCUMENTS

The following documents must be read in conjunction with the Code. The Code is not intended to replace or supersede these documents.

8.1 CEACA DOCUMENTS

- CEACA-PP-005 Media Communications Policy (SPV)
- CEACA-PP-006 Privacy Policy (SPV)
- CEACA-PP-004 Health and Safety Policy (SPV)

8.2 LEGISLATIVE DOCUMENTS

- Associations Incorporation Act 2015
- Australian Charities and Not-for-Profits Commission Act 2012 (Cth)
- ACNC Governance Standards
- Corporations Act 2001 (Cth)
- Disability Discrimination Act 1992
- Privacy & Responsible Information Sharing Act 2024 (PRIS)
- Privacy Act 1988

- Human Rights & Equal Opportunity Commission Act 1986
- Racial Discrimination Act 1975
- Sex Discrimination Act 1984

9.0 DEFINITIONS

Term	Definition
CEACA Ltd	Refers to: CEACA Ltd, a Special Purpose Vehicle created for the CEACA Expansion Project. The sole Member is CEACA Inc.
CEACA Inc	Refers to: CEACA Incorporated – Central East Accommodation & Care Alliance Inc (Sole Member of CEACA Ltd)
Chairperson	The Chairperson of the Board of Directors.
Clients	Customers, owners and tenants of CEACA Ltd products.
Colleagues	Refers to all CEACA Ltd staff, representatives, and internal contacts as defined in these definitions.
Code of Conduct	A Code of Conduct outlines the standards of behaviour expected of people belonging to a certain organisation or group.
Conduct	Behaviour – revealing itself in actions, responses, words, gestures or choices.
Confidential Information	Information, knowledge or communication that is intended to be private including, but not Ltd to, intellectual property and trade secrets, IT systems, business plans, finance information, software, manuals and client information.
Conflict of Interest	A situation in which a CEACA director or staff member has a private or personal interest sufficient to appear to influence their objectivity in the performance of their duties; or a situation in which an opportunity exists for an individual to exploit their position with CEACA Ltd for the benefit of their other interests.
Director	A Director serving on the Board of Directors of CEACA Ltd
Electronic Devices	Resources provided by CEACA Ltd including, but not Ltd to: <ul style="list-style-type: none"> • communication facilities such as email • Internet and network access • data storage including CDs, USB thumb drives • computers, mobile devices and peripherals • software, network tools and databases • telephones (fixed and mobile) and voicemail • any IT equipment that has access to CEACA Ltd IT resources.
External Contacts	Includes stakeholders, competitors, visitors, tenants, clients, guests, customers or partners of CEACA Ltd.
Fraudulent activity	Wrongful or criminal deception intended to result in financial or personal gain.
Intellectual Property (IP)	Intellectual property (IP) refers to the ownership of intangible and non-physical goods that have commercial value. This includes ideas, names, designs, symbols, artwork, writings and other creations. It also refers to digital media, such as audio and video clips that can be downloaded online.
IT Resources	CEACA Ltd network and electronic devices.

Term	Definition
Mobile Device	Laptops, iPad, mobile phones, tablets and broadband devices that are used to conduct CEACA business whether owned by CEACA Ltd or not.
Policy Document	General term for referring to CEACA Ltd policies, procedures, guidelines and forms.
Property	Property owned or managed by CEACA Ltd, including all intellectual property, IT resources, facilities, assets, vehicles, office equipment, documents, manuals, programs, reports, processes and/or improvements made by a CEACA staff member whilst they are employed by CEACA.
Reasonably / Reasonable	In determining whether conduct or conduct expectation is reasonable, all circumstances of the situation will be considered including the CEACA Ltd values. Determining reasonableness requires consideration of how a reasonable person would act in the same or similar situation.
Social Media	Media for the purpose of social interaction using web-based technologies that facilitate conversations and interactions online between groups of people such as Facebook and Twitter.
Staff	Includes staff, contractors or sub-contractors, consultants, labour hire employees, apprentices or trainees and volunteers involved with the activities of CEACA Ltd. It also includes any person serving CEACA Ltd on a committee or advisory capacity.
Stakeholder	A person, group, or organisation that has an interest or concern in an organisation.
Work Associates	People you have a relationship or connection with, or interact with, through work. A work associate may include, but is not Ltd to, a colleague, external contact or anyone associated with CEACA Ltd.
Workplace Interactions	Work related interactions with fellow CEACA staff or Directors and external contacts whilst in the workplace or off site.
Work Related Events	Are events where the person is representing CEACA Ltd, including but not Ltd to: <ul style="list-style-type: none"> • attendance at social functions and celebrations • work-related travel • attendance to conferences and external events.