

CODE OF CONDUCT

1. INTRODUCTION

In this Code of Conduct (**Code**) a reference to the **Institute** means The George Institute for Global Health, and/or its subsidiary and/or associated companies, as the context requires.

The Institute aims to conduct its operations with integrity, credibility, social responsibility and accountability. The purpose of this Code is to set standards for professional practice and conduct for all:

- employees of the Institute (whether employed on a permanent, temporary or casual basis) (**Staff**); and
- consultants, students, seconded personnel, contractors, subcontractors, volunteers, and any other associates undertaking work in any capacity for or on behalf of the Institute (collectively, **Associates**), and operates in conjunction with all other Institute policies and procedures.

All Staff must comply with the Code, and all Associates must comply with the Code in respect of their activities relating to or impacting upon the Institute.

The Code provides a framework to promote ethical day to day conduct and decision making. It does not and cannot cover every situation that can arise in the workplace. The Code does not replace the need for common sense in how Staff and Associates conduct themselves.

This Code will be subject to revision from time to time in response to changes in requirements or circumstances.

2. PRINCIPLES

All Institute activities should be conducted with the intention of bringing health, social or economic benefits to the populations of millions of people worldwide. This requires that the activities of the Institute be performed with assurance of quality and reliability and without material conflict of interest. All activities of the Institute should be conducted with due respect for the cultural, ethnic and economic circumstances of the countries and regions in which such activities are performed.

3. VALUES

The Institute's values articulate the basic assumptions and beliefs that define our organisational culture and need to be shared amongst Staff and Associates to ensure fulfilment of our mission. All Staff and Associates undertaking any work on behalf of the Institute shall act in accordance with the following values and associated behaviours:

Our **HUMANITARIAN** commitment will spur us to tackle the health issues affecting high-risk and disadvantaged people worldwide:

- Considers the human benefits of actions whilst making decisions
- Demonstrates compassion and empathy in their relations with others
- Demonstrates a genuine regard toward the Institute's mission

Our focus on **EXCELLENCE** will produce scientific evidence of the highest quality by any benchmark:

- Wants, plans, acts to meet or surpass a standard of excellence
- Measures outcomes against goals: Innovates to improve
- Takes calculated risks to do something new or better

Our **CREATIVITY** will challenge traditional thinking and provide an impetus for new and innovative solutions to the world's leading health problems:

- Openly & constructively questions traditional ways of doing things and fundamental assumptions
- Makes connections between previously unrelated ideas
- Recognises and encourages creative ideas of others

Our **INTEGRITY** will underpin all our work and interactions, including our collaborations with partner organisations worldwide:

- Communicates intentions, ideas and feelings openly to build mutual trust and confidence
- Demonstrates personal accountability in decisions and actions

Our '**CAN DO**' approach will produce timely, effective action, even in the face of adversity or other barriers to implement:

- Demonstrates enthusiasm and persistence to resolve problems and achieve agreed outcomes
- Remains calm, productive and positive when faced with change, ambiguity and uncertainty

Our emphasis on **IMPACT** will ensure our work has real consequences for those who are most vulnerable to disease and injury:

- Continuously measures progress towards organisational outcomes and adjusts actions to ensure success
- Sets personal goals that are aligned with the organisational strategy

4. RESPONSIBLE PRACTICE

4.1 Relationships with sponsors

The Institute's relationships with sponsors must be free of material conflicts of interest. This applies equally to public and private sponsors. The Institute will not accept funds or support in kind from any organisation that is in conflict with the Institute's Principles and Values (including tobacco companies and organisations associated with terrorism).

Except in the case of commercial fee for service projects, Staff should have a role in the design, analysis, interpretation and publication of all projects in which they are substantively involved. Project sponsors must not unreasonably restrict this role. Specific requirements include:

- While sponsors of Institute developed activities may be given an opportunity to comment on Institute reports before publication or presentation of the results, they cannot have the right of veto.
- Grants of money or equipment should be made to the Institute and not to individuals, and should be appropriately acknowledged in relevant reports and presentations.
- The Institute must have the right to define the work to be included in any project prior to its commencement and identify the milestones to be reached throughout the project.
- The Institute must retain the right to determine the appropriate allocation of Staff and other resources to each project.
- The Institute can only accept funds for Institute-led projects on a 'best efforts basis', agreeing on receipt of an offer of funding, to undertake a project without guaranteeing specific outcomes. This approach reflects the essential nature of academic endeavour.
- All financially sponsored activities require written contractual agreements, which are transparent and open to professional scrutiny.
- The Institute's Legal Office should be advised at an early stage in the negotiation of a contract.
- Only those with the appropriate delegation have authority to sign contracts on behalf of the Institute.
- Contracts can be offered which state that funds will be provided upon achievement of certain 'milestones' that are identified prior to the commencement of the project, provided that such milestones represent progress on the project and not particular results achieved.
- Funds must be used in accordance with the terms and conditions under which those funds were received.
- Sponsors may seek the right to have alterations made to the design or conduct of projects following their initiation. The Institute requires that any such variations to the original agreement should not occur without adequate negotiation with the Institute, in order to protect the Institute from financial loss and protect the integrity of the project.
- The results of all projects must be available for presentation and publication. Where confidentiality provisions apply (for example, where the researchers or institution have

given undertakings to third parties, such as the subjects of the research), results must be reported in such a way as to prevent any breach of such confidentiality.

- Confidentiality agreements to protect intellectual property rights may be agreed between the Institute and the sponsor of the research. However, such protection should not limit the value of the project undertaken.
- If the sponsor wishes to use the Institute's name and/or logo, written approval from the appropriate Staff member with delegated authority to lead the underlying project, as well as the Communications officer in charge of branding within the Global Communications and Advocacy team, must be obtained prior to use.
- Staff and Associates must not have any major personal conflict of interest that could be perceived as biasing the conduct or outcome of Institute projects. This specifically includes holding shares in companies sponsoring Institute projects or receiving regular personal income as a consultant for such companies.
- Where there is a minor conflict of interest, such as the receipt of lecture honoraria or occasional consulting fees for advice provided to a sponsoring agency or company, this must be declared.
- The Institute reserves the right to prohibit the involvement of Staff in any commercial activity that poses a conflict of interest or is otherwise potentially damaging to the interests of the Institute.

4.2 Relationships with non-funding sponsors

Non-funding sponsors include public or private organisations that provide goods or services (for example, data) to the Institute, and may be perceived to have a vested interest in the outcome of the research.

Agreements with non-funding sponsors of projects should follow the same principles as outlined above for agreements with financial sponsors.

4.3 Relationships with collaborators

Collaborative research projects are those that are jointly carried out by the Institute and at least one other partner of similar professional standing. Such collaborations are central for much of the Institute's work and are strongly encouraged.

In all cases it is vital that the agreement on the ownership or use of the intellectual property resulting from such collaborative projects and partnerships be negotiated at the contract stage and not left for consideration only if a commercial application arises in the project.

Before the Institute participates in collaborative projects or partnerships where intellectual property may be generated, it will enter into a written contract with the third parties agreeing on:

- The nature of the work to be produced and the roles and responsibilities of the parties involved; and
- Ownership of the intellectual property (and associated rights) arising from the collaboration or partnership, unless reserved to the funding body (or third party).

Such collaborative projects or partnerships shall be considered and, where necessary negotiated, by the Institute on a case by case basis, prior to the commencement of the project or partnership.

Where intellectual property arising out of a collaborative project or partnership is agreed to belong to a party other than the Institute, the Institute may require as a condition of agreeing to such arrangement, a royalty-free, non-exclusive, world-wide and irrevocable licence allowing the Institute to use and exploit that intellectual property in the course of its mission.

Please also refer to the Institute's [Intellectual Property Policy](#).

4.4 Research misconduct

Research misconduct includes fabrication, falsification, plagiarism, or other practices that seriously deviate from those commonly accepted within the scientific community for conducting or reporting research. Allegations of research misconduct for any projects with which the Institute is associated should be directed to the Institute's Chief Scientist. In all instances, the investigation process will be independent, open and transparent, and involve a review by peers. Following preliminary investigations, should there be evidence of research misconduct, the relevant funding agencies or collaborators will be advised in confidence.

The Institute management will take appropriate action against any Staff member or Associate found to have engaged in research misconduct, which could include (as appropriate) disciplinary action (including dismissal), termination of contract, and referral of the matter to the police or other relevant government agency.

Please also refer to the Institute's [Research Code of Conduct Policy](#).

5. ACCEPTANCE OF GIFTS OR BENEFITS

To ensure Staff and Associates are seen to uphold the Institute's independence and reputation, the solicitation or acceptance of cash from suppliers or contractors to the Institute is not permitted. Acceptance of gifts in kind must be restricted to those that are offered by companies as part of their normal marketing activities. Staff and Associates should use their discretion when accepting any gifts, including honorariums, and have a responsibility to declare to Institute management the offer of gifts or benefits that have a significant monetary value. At all times Staff and Associates are prohibited from asking, demanding or accepting any form of commissions or gratifications during their dealing with vendors or any commercial entities while dealing on behalf of the Institute.

Staff are permitted to enjoy the hospitality of Institute suppliers, contractors or sponsors in the form of meals or social events on the condition that it does not entail any commercial obligation nor lead to misconceptions of conflict of interest, however ill founded. Staff involved in sponsored activities may accept reasonable reimbursement for salary, travel, lodging, and meals. If such activities are performed on behalf of the Institute, the amount of reimbursement should be specified in a written arrangement, with all monies paid into an appropriate Institute bank account.

Staff and Associates must report any offers of bribes to their manager, who should then ensure the matter is reported as corrupt behaviour in accordance with this Code.

6. EXTERNAL BUSINESS ACTIVITIES / SECONDARY EMPLOYMENT

The Institute appreciates the contribution Staff make through external activities such as teaching, collaborative research, consulting work and participation on committees and considers that these are in the public interest and of benefit to the Institute and to the individuals involved. However, Staff and Associates engaged in paid Institute work must ensure that any non-Institute work:

- Does not conflict with their Institute work
- Does not conflict with the performance of Institute duties
- Does not involve the inappropriate use of Institute resources
- Is performed outside the Staff member's normal working hours, or, in the case of an Associate, is performed outside the hours he or she is contracted to perform services for the Institute

Senior Staff should also refer to the Institute's Policy in relation to secondary employment.

Private professional activities are not covered by the Institute's insurance. It is the responsibility of each Staff member undertaking private professional activities to ensure that he or she holds the necessary professional registration to practise and professional indemnity insurance sufficient to cover all potential claims, damage or loss sustained during or as a result of private professional activities.

7. CONFLICTS OF INTEREST

The Institute also acknowledges that external interests may give rise to conflicts of interests, whether actual, potential or perceived. This does not of itself imply that any wrongdoing has occurred or will occur. Staff and Associates owe obligations of good faith, confidentiality and loyalty of service to the Institute and must:

- Ensure that there is no conflict between their external personal or financial interests and their duties to the Institute.
- Not allow their duties to any external entity to come into conflict with their duties to the Institute.
- Promptly make full disclosure to the Institute of all relevant facts and circumstances giving rise to an actual, potential or perceived conflict of interest and cooperate with the Institute to ensure all appropriate steps are taken to eliminate or manage such conflicts in accordance with this Code.
- Provide a public declaration to accompany any presentation or publication where their external, personal or financial interests actually or potentially, impact or might be perceived to impact upon the objectivity of such presentation or publication in which the Staff member or Associate is involved.

Failure to fully disclose information about a conflict of interest may constitute misconduct and result in disciplinary action against the offending Staff member, or termination of the Institute's contract with the offending Associate (as applicable).

Please also refer to the Institute's [Conflict of Interest Policy](#).

8. DISCLOSING CONFLICTS OF INTEREST, GIFTS, BENEFITS, EXTERNAL BUSINESS ACTIVITIES, SECONDARY EMPLOYMENT

The procedure for Staff and Associates to disclose actual, potential or perceived conflicts of interest (including, without limitation, arising as a result of being offered or accepting gifts or other benefits, external business activities, personal relationships, or secondary employment) is as follows:

- The Staff member must notify their Manager and, in the case of an Associate, notify the Institute, verbally or in writing of the actual, potential, or perceived conflict of interest.
- If the Manager or Institute believes the conflict warrants formal disclosure, the Staff member or Associate must complete the Conflict of Interest Disclosure Form via the Institute's electronic [Conflict of Interest portal](#).
- The Conflict of Interest Disclosure Form will be reviewed and assessed by the relevant manager and the Conflict of Interest Committee. The relevant Staff member or Associate will be advised of the outcome of the assessment, with recommended actions, where appropriate.

9. PUBLIC COMMENT

Institute management acknowledges that Staff and Associates may wish to speak publicly about certain issues. The Institute also encourages academic Staff to participate in public debate and be available to the media for comment in their field of expertise. However, Staff and Associates must be aware of the following guidelines in regard to 'Public Comment':

- Wherever possible, Staff should coordinate their public engagement with the Global Communications and Advocacy team, in particular alerting the team to any newsworthy statement.
- All Staff and Associates have a professional responsibility to uphold the excellent reputation of the Institute and to exercise good and ethical judgment in any public comment. Any public statement made by a member of Staff or Associate should not bring the Institute into disrepute.
- When commenting in public, Staff and Associates are expected to act in good faith and not misrepresent their expertise.
- All Staff and Associates have an obligation to respect the confidentiality and privacy of information entrusted to them in the course of their employment or engagement with the Institute.
- Staff contributing in a professional capacity to public commentary should identify themselves using their Institute title, appointment and/or qualifications when they are writing or speaking publicly on a matter within their academic or professional field of expertise or specialisation.
- Statements should be accurate, professional and exercise appropriate restraint. Where it is discovered that false, misleading or incorrect statements have been made, the problem must be voluntarily and promptly rectified.

- Staff and Associates, who are seen as leaders in their field, may be asked to make public comments supporting a commercial product. While such comments may be appropriate in some cases, promoting commercial interests in the guise of editorial comment ('advertorials') must be avoided.
- Issues related to Institute policies, management, or operational decisions are confidential. It is mandatory that only Staff officially representing the Institute may comment publicly on these and related issues.
- Staff and Associates must familiarise themselves with and follow the Institute's **Social Media Policy**.

Staff and Associates commenting publicly on an issue not in their field of expertise should:

- Do so from a private address (whether postal or email).
- Not use an Institute letterhead.
- If they wish to identify themselves as an Institute Staff member, also indicate unambiguously that they are expressing their personal opinion and not presenting the opinion or position of the Institute.
- Follow the Institute's **IT Acceptable Use Policy** and **Mobile Services Policy**.
- Be mindful that they show respect for the opinions of others, do not injure a person's reputation or create a basis for defamation action.

In such cases, the Institute cannot be responsible for any claims in defamation or otherwise that may follow such comment. Training is available for Staff in dealing with the media. Staff wishing to develop their media skills should contact their local Communications Manager for further information.

If a member of Staff or an Associate is concerned that a statement they have made or are about to make may be defamatory or if they receive a claim or an intimation of a claim that a statement which they have made is alleged to be defamatory they should contact the head of Global Communications and the Legal Office for advice as to the options which are available to them.

Staff and Associates should be aware that the Institute may take disciplinary action against offending Staff members, and terminate contracts with offending Associates (as applicable), for breaches of the public comment guidelines.

Please also refer to the Institute's [Social Media Policy](#).

10. USE OF OFFICIAL RESOURCES

All Institute resources must be used in an efficient manner for Institute purposes only, unless permission has been granted for non-Institute or private usage.

Internet and email facilities are provided as a business tool and not for private matters. All emails (including personal emails) received or sent using Institute resources remain the property of the Institute at all times. The Institute reserves the right for authorised staff to access communication resources to ensure they are being appropriately used to carry out Institute related duties.

Staff and Associates must ensure that the manner in which they use the Institute's internet and email facilities is responsible, ethical and legal, including personal use of social media. Unacceptable use includes: use that violates the rights of others, including intellectual property rights such as copyright; use of Institute resources for the purpose of gambling, gaming, or to conduct a business; use for harassment or discriminatory acts, or any other illegal activities; use that constitutes slander or defamation; and storing, accessing or circulating objectionable material (including pornographic, obscene, or criminal material) using Institute resources.

The transmission of objectionable material (including pornographic, obscene, or criminal material) through the Institute's communication resources is forbidden and will lead to disciplinary action against the offending Staff member, or may result in termination of the offending Associate's contract. Management may dismiss a Staff member for any infraction of this nature.

Please also refer to the Institute's [IT Acceptable Use Policy](#).

11. USE AND SECURITY OF CONFIDENTIAL INFORMATION

Staff and Associates must:

- Maintain the integrity, confidentiality and privacy of Confidential Information to which they have access in the course of their employment or engagement with the Institute.
- Take all reasonable precautions to prevent unauthorised access to, or misuse of Confidential Information.
- Comply with the Institute's **Privacy Policy**.

Confidential Information includes all information, records and materials of the Institute, and all information, records and materials received by the Institute from any third party (including any study participant, client, sponsor or collaborator), which are not generally publicly available and of a proprietary or confidential nature, even if they are not marked as such.

Staff and Associates must not:

- Disclose Confidential Information, except when, and to the extent that, they are authorised to do so as a part of their normal duties, or when required or permitted to do so by Institute policy, law, court order or other legal instrument.
- Access or use Confidential Information, except for an authorised purpose.
- Destroy, or authorise the destruction of, Confidential Information other than in accordance with Institute policy and relevant legislation.
- Leave Confidential Information in cars or public places.

Please also refer to the Institute's [Privacy Policy](#).

12. INTELLECTUAL PROPERTY / COPYRIGHT

All Staff and Associates agree that ownership of all inventions, improvements, designs, creations and other developments which they may make either alone or with others in connection with the work being undertaken for the Institute are the sole and exclusive property of the Institute and may constitute Confidential Information. Staff and Associates

agree to notify the Institute immediately about any inventions, improvements, designs, creations or other developments. Staff and Associates agree that they will, at the Institute's expense, execute any documents and do any things which may be necessary to enable the Institute or its nominees to apply for patent, registered design, trade mark or other intellectual property protection.

Please also refer to the Institute's [Intellectual Property Policy](#).

13. DISCRIMINATION AND HARASSMENT

The Institute is committed to providing a workplace free from harassment and discrimination for all Staff.

Staff members and Associates must not harass or discriminate against fellow Staff members, Associates, and other persons working within the same workplace, visitors to Institute premises or collaborators with the Institute for any reason including gender, physical appearance, pregnancy, race, age, sexual preference, religious or political conviction, marital status, physical or intellectual disability.

The Institute does not tolerate any forms of sexual harassment. This includes the making of unwelcome sexual advances, requesting sexual favours or engaging in other forms of unwelcomed conduct of a sexual nature.

Please also refer to the Institute's [Anti-Discrimination Bullying & Harassment Policy](#).

14. CORRUPT CONDUCT, MISMANAGEMENT AND SERIOUS WASTE OF RESOURCES

The Institute is committed to conducting its activities with integrity, credibility, social responsibility and accountability. The Institute will take appropriate disciplinary action against any Staff member, and may terminate its contract with any Associate, who is found guilty of corrupt conduct, receiving or offering bribes, mismanagement or serious waste of Institute money or other resources.

Staff members and Associates have an obligation to report any such instances of misconduct. The Institute is committed to protecting those who bring to the attention of the management evidence of misconduct and will ensure all disclosures are properly investigated in a timely manner.

All reports by a Staff member about alleged misconduct must be channelled through to that person's immediate Manager unless it is an issue concerning the Manager, in which case it should be taken to that Manager's supervisor or, in the absence of such supervisor, directly to one of the Principal Directors.

15. ANTI-BRIBERY AND ANTI-CORRUPTION

The Institute must conduct its business in a lawful and ethical manner, in accordance with applicable laws and regulations, including the U.S. Foreign Corrupt Practices Act of 1977 (the **FCPA**). The FCPA prohibits making, promising, or authorising the making of a corrupt payment or providing anything of value to a government official to induce that official to make any governmental act or decision to assist a company in obtaining or retaining business. The

FCPA also prohibits a company or person from using another company or individual to engage in any of the foregoing activities.

The Institute requires that its Staff, Associates, and any person or entity acting on its behalf (collectively, **Business Associates**) comply with the principles of the FCPA and any similar local requirements or regulations.

Definition of a Government Official

A "**government official**" is broadly interpreted and includes: (i) any elected or appointed government official (e.g., a member of a ministry of health); (ii) any employee or person acting for or on behalf of a government official, agency, or enterprise performing a governmental function; (iii) any political party, officer, employee, or person acting for or on behalf of a political party or candidate for public office; or (iv) an employee or person acting for or on behalf of a public international organisation (e.g., the United Nations). "**Government**" is meant to include all levels and subdivisions of governments (i.e., local, regional, or national and administrative, legislative, or executive).

Because this definition of "government official" is so broad, it is likely that Business Associates will interact with a government official in the ordinary course of their business. For example, doctors employed by state-owned hospitals could be considered "government officials".

FCPA, Anti-Corruption and Anti-Bribery Principles

Business Associates may not directly or indirectly make, promise, or authorise the making of a corrupt payment or provide anything of value to any government official to induce that government official to make any governmental act or decision to help the Institute obtain or retain business.

Business Associates may never make a payment to or offer a government official any item or benefit, regardless of value, as an improper inducement for such government official to approve, reimburse, prescribe, or purchase a product or service of the Institute, to influence the outcome of a clinical trial, or otherwise improperly to benefit the Institute's business activities.

Understand and Follow Local Laws

Business Associates need to understand whether local laws, regulations, or operating procedures (including requirements imposed by government entities such as state-owned hospitals or research institutions) impose any limits, restrictions, or disclosure requirements on compensation, financial support, donations, or gifts that may be provided to government officials.

Business Associates must take into account and comply with any applicable restrictions in conducting their activities on behalf of the Institute. If a Business Associate is uncertain as to the meaning or applicability of any identified limits, restrictions, or disclosure requirements with respect to interactions with government officials, that Business Associate should consult with the Institute. A member of Staff must consult with his or her Manager before undertaking such activities.

16. PRIVACY

The Institute respects and is committed to protecting the privacy of its Staff and any third parties with whom it works (including Associates, clinicians, patients, and customers). The Institute requires all Staff and Associates to adhere to the Australian Privacy Principles described in the *Privacy Act 1988* (Cth) (as amended from time to time), the relevant State privacy legislation, as well as any relevant foreign privacy rules, as applicable to their activities.

For all clinical research activities, Staff and Associates are required to adhere to the ICH Guidelines for Good Clinical Practice in respect to the use, protection and security of personal information collected from research subjects.

Please also refer to the Institute's [Privacy Policy](#).

17. WORK HEALTH AND SAFETY

The Institute has an obligation to provide a workplace that is safe and without risk to health. However, Staff members (and Associates attending Institute premises) share this responsibility and must follow safety and security guidelines, keep work areas tidy and promptly raise potential safety issues. Staff members must raise these issues with their immediate Manager.

Smoking is prohibited in all Institute premises and at all Institute-sponsored meetings and functions. The misuse of alcohol and other drugs can affect work performance and jeopardise the safety and welfare of colleagues. Staff members and Associates must not remain in the workplace or undertake any work-related activities if impaired by alcohol or other drugs.

Please also refer to the Institute's [Work Health Safety Policy](#).

18. CONDUCT OF FORMER STAFF MEMBERS AND ASSOCIATES

Staff members should not misuse their position with the Institute to gain opportunities for future employment nor be influenced in their work by plans for outside employment. On termination of employment, all Institute documentation, equipment and property within a Staff member's possession must be returned.

Staff members and Associates are bound by their contracts with the Institute to observe the confidentiality of all Confidential Information even when they are no longer employed or engaged by the Institute.

19. MODERN SLAVERY

The Institute is committed to respect and support human rights in combatting modern slavery in its business and supply chains. Staff and Associates are required to act ethically with high professionalism in accordance with the Institute's values to avoid any activity that might lead to, or suggest, a breach of the Institute's Modern Slavery Policy. Any issue or suspicion of Modern Slavery in any parts of the business or supply chains of any supplier tier must be raised at the earlier possible stage to the Institute.

Modern Slavery is an umbrella term used to describe the act of deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. It encompasses a wide range of activities which continues to exist in present day society, such as slavery, servitude, forced and compulsory labour, forced marriage, debt bondage and human trafficking, whether committed against adults or children. It is a crime and a violation of fundamental human rights.

Please refer to the Institute's [Modern Slavery Policy](#).

20. WHISTLEBLOWING

The Institute is committed to the highest standards of conduct and ethical behaviour, research integrity and good corporate governance and to operating:

- legally and in accordance with applicable legislation and regulations;
- properly, in accordance with organisational policy and procedures; and
- ethically, in accordance with recognised ethical principles.

Any Staff and Associates who become aware, on reasonable grounds, of any issue or behaviour that amounts to Reportable Conduct should lodge a report to:

- the Institute's external whistleblower service ([Your Call](#) – using the code **GEORGEINST** or Australian telephone number **1-300-790-228**);
- the Global Chief Operating Officer, Director Global HR, or Commercial Director George Clinical;
- the Institute's Whistleblower Protection Officer (Chief Operating Officer);
- a member of an audit team conducting an audit on the Institute; or
- the authorities responsible for the enforcement of the law in the relevant area.

Reportable Conduct is:

- conduct which is dishonest, fraudulent or corrupt, including financial fraud or bribery;
- illegal activity including but not limited to theft, drug sale or use, violence, harassment or intimidation, criminal damage to property or other breaches of state or federal law;
- official misconduct or maladministration;
- research misconduct or intentional data mismanagement;
- unethical conduct or conduct in breach of the Institute's policies, including but not limited to dishonestly altering company records or data, adopting questionable accounting practices or wilfully breaching the Institute's Code of Conduct or other policies or procedures;
- conduct that could be damaging to the Institute, an Institute employee or a third party, including but not limited to unsafe work practices, environmental damage, health risks or abuse of Institute property or resources;
- conduct which amounts to an abuse of authority;
- conduct which may cause financial loss to the Institute, damage its reputation or be otherwise detrimental to the Institute's interests;

- conduct which involves harassment, discrimination, bullying or victimisation; or
- conduct which involves any other kind of serious impropriety, including but not limited to serious and substantial waste of public resources, practices endangering the health or safety of employees, stakeholders or the general public, practices endangering the environment and research misconduct.

Reportable Conduct does not include personal work-related grievances. Personal work-related grievances include, but are not limited to, interpersonal conflicts between Staff, or a decision relating to the engagement, transfer or promotion of a Staff member. For personal work-related grievances or other issues employees should refer to [Grievance Policy](#) on Gwiz.

The Institute management will take appropriate disciplinary action against any Staff member found to have engaged in unethical or illegal conduct, which could include dismissal and or referral of the matter to the police or other relevant government agency.

While Associates may not be subject to disciplinary action, conduct that is assessed to be a serious breach of the Code may result in the termination of their contract.

Please refer to the Institute's [Whistleblower Policy](#).

21. DECLARATION

I have read and understand the above Code and agree to comply with its provisions at all times while working with the Institute. I acknowledge my commitment to achieving the best outcomes for the Institute and contributing to a safe and productive working environment.

Advice in relation to this Code may be obtained from the Chief Operating Officer and/or Legal Office.

22. REVISION HISTORY

| Version | Replaces | Date and Description of change / reason |
|------------------------|----------|---|
| V7.0 (21 June 2021) | V6.0 | Modernised policy format in line with current policy template; reviewed and updated conflict of interest provisions to recognise and introduce the new electronic disclosure procedure. |
| V6.0 (27 Mar 2020) | V5.0 | Inserted new section on Modern Slavery, deleted Breach of Code of Conduct section and replaced with Whistleblowing section |
| V5.0 (29 Mar 2018) | N/A | Annual review cycle: minor corrections and updates (e.g. typographic, formatting, footer descriptions etc.) |
| V5.0 (29 Jun 2016) | V4.0 | - |
| V2.0 – V4.0 | - | - |
| V1.0 (Dec 2012) | N/A | First Version |

23. APPROVAL

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|------------------------------------|--|
| Title of Owner / Author | |
| Approved by: COO / Director | |