



Code of Conduct (The Regis Way)

Version: 3

Date: December 2022

Next review due by: December 2025

Developed by: Company Secretary / General Counsel

Page 1 of 12

Authorised by: The Board of Directors

Issued To: All Staff

PURPOSE

Regis is committed to high levels of integrity and ethical standards in all our business practices and interactions with the people we serve.

Our Code of Conduct (the Regis Way) outlines how we expect our People to behave and conduct business in accordance with current community, legislative, practice and company standards.

We regularly monitor and test our policies under the Regis Way to ensure our commitments remain relevant, effective and consistent with our stakeholders' expectations.

While the Regis Way is designed to ensure we deliver on our commitment to corporate responsibility and sustainable business practice, it does not create any rights in any Regis People, residents/clients and their representatives, suppliers, competitors, shareholders or any other person or entity.

STAFF THIS POLICY APPLIES TO

All Regis People must comply with the Regis Way.

The Regis Way applies to all business activities and interactions with suppliers, contractors, residents, clients and their representatives, shareholders, volunteers and employees.

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POLICY


1. INTRODUCTION

1.1. Our Purpose, Values and Behaviours

At Regis, our Purpose is to *provide personalised, and respectful care that embraces the experience of ageing.*

We fulfil our Purpose by living our Values and demonstrating our Behaviours.

| Our Values of... | ...are shown through our Behaviours.... | ...to support the People we Serve, being... |
|--|---|--|
| <ul style="list-style-type: none"> •Optimism – we are enthusiastic about what we do •Passion – we make a positive difference every day •Integrity – we act in a professional and ethical manner at all times •Respect – we listen, we are polite and treat every person with courtesy. | <ul style="list-style-type: none"> •We have a relentless customer focus •We are transparent and accountable •We are collaborative •We all own quality and safety •We continuously improve •We are inclusive | <ul style="list-style-type: none"> •Our Residents •Our Clients •Our People •Our Care Partners •Our Community •Our Shareholders |

| | |
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1.2. How the Regis Way interacts with other company policies and process

The Regis Way is underpinned by our Purpose, Values and Behaviours and should be read in conjunction with our other policies which are accessible via the Regis intranet and website.

We continually review our policies and processes to ensure compliance with corporate governance and legislative requirements. Regis' People are notified of any material changes to the policies and processes via the Regis intranet.

2. THE REGIS WAY AND YOU

2.1. How do I apply it?

We all must conduct ourselves in accordance with the Regis Way and stop or prevent actions or behaviour that could harm our people, our residents and clients, our communities, our business, or our reputation.

If situations arise which are not specially covered by the Regis Way or any other policy, you should ask yourself whether your action or decision is consistent with the Regis Way, such as:

- is this behaviour, decision or action (including inaction) lawful and ethical?
- am I authorised to make this decision or take this action?
- is this decision/behaviour a reasonable management action for the efficient running of a business?
- is this decision/behaviour consistent with our Values?
- would I feel okay if my decision/behaviour was reported in the media?
- how would I like it if someone treated me this way?
- what would happen if everybody took this course of action?
- have I really thought through my decision or behaviour and the impact it may have on my character, people in the Regis community and the reputation of Regis?
- would I still take the same action if it was my business, my money, or my time?

Similarly, if you believe that acting in accordance with the Regis Way in a particular situation would be damaging to any member of the Regis Community, you must seek clarification from your Manager.

2.2. Leadership commitment

Our Board, executive and management team are responsible for:

- acting in accordance with the law and the Regis Way alongside all other Regis People;
- taking reasonable management action that is required for the efficient operation of our business and delivery of care to our residents and clients; and
- making sure that our people understand and comply with the Regis Way.

2.3. What happens if there is a breach?

Failure to comply with the Regis Way may result in disciplinary action in accordance with our Managing Misconduct Policy, up to and including termination of employment or engagement.

Regis reserves the right to inform the appropriate authorities where it is considered that there has been criminal activity or a suspected breach of the law.

2.4. Who to speak to if you have questions



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If you have any questions regarding the Regis Way or any of our policies at any time, you should contact your Manager at first instance.

3. DELIVERING CARE AND SERVICE TO OUR RESIDENTS AND CLIENTS

We must always adhere to the Aged Care Code of Conduct, the NDIS Code of Conduct and any other relevant legislation.

In addition to these requirements, and the Regis Strategic Quality and Clinical Governance Framework, the following principles should be followed in our interactions with our residents and clients to ensure they experience the best possible care, support and services.

| Guiding Principle | What it means to us | What we do, every day |
|--|---|--|
| We genuinely care | <p>Regardless of our role, we really care: about the Regis Community - our residents, clients and their loved ones, team members and our work.</p> <p>We provide care, support and services in a professional, safe and competent manner, with care and skill.</p> <p>We are consistent in our efforts, and work to the best of our ability.</p> <p>We concentrate all our efforts on making valuable contributions.</p> <p>We are committed to keeping the Regis Community safe.</p> | <p>We follow our Freedom from Abuse Policy and KeepSafe from Behaviours of Concern Policy and take all reasonable steps to ensure residents and clients are protected from all forms of violence, discrimination, exploitation, neglect and abuse and sexual misconduct, and that every person in our care is safe and treated with dignity and respect.</p> <p>We act with integrity, honesty and transparency.</p> <p>We willingly lend a helping hand to colleagues and promptly take steps to raise concerns about matters that may impact the quality and safety of care.</p> |
| We unite to deliver great care and service | <p>We value diversity and recognise our residents, clients and their families come from diverse backgrounds and cultures, which may be different to our own.</p> <p>We strive to understand their needs, to deliver great service.</p> <p>We recognise that meeting their needs is the purpose of our work.</p> <p>We welcome new team members, and help them learn. We understand that a co-operative team can achieve 'more'.</p> | <p>Our resident and client Inclusivity Policy Statement outlines our commitment to treating its resident and clients with dignity and respect, by valuing their identity, culture and diversity.</p> <p>We work co-operatively with team members of all backgrounds.</p> <p>We keep our promises, are reliable and do what we say we will do.</p> <p>We notice and appreciate the effort of others, and say thank you.</p> |
| We are lifelong learners | <p>We recognise that to keep delivering high quality care and services we must maintain contemporary job skills and keep current with changing legislation or industry practices.</p> | <p>We willingly attend and participate in required training and learning activities.</p> <p>We are enthusiastic about learning new skills and ways of working.</p> <p>We listen to, seek out, offer and accept constructive feedback, to learn and keep on improving.</p> |



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| Guiding Principle | What it means to us | What we do, every day |
|---|---|--|
| We work in our residents and client's homes, they don't live in our workplace | We strive to create a home like environment. We recognise and respect our residents and client's rights to freedom of expression, self-determination and decision-making in accordance with applicable laws and conventions. Every day, we all add value to our residents and client's lives. If we work in a support role, we ensure we understand and meet the needs of the many team members who directly service our residents and clients. | We always greet residents and clients and their families with a warm hello and in the way they like to be greeted, which may be different to our own customs. We make genuine efforts to know our residents and clients as individuals. Our conversations and actions are appropriate to working in someone else's 'home'. We are warm, gentle and respectful towards our residents and client's. |
| We respect and promote privacy, dignity and confidentiality | We act with respect for the dignity and privacy of our people. We recognise that our work brings access to confidential and personal information concerning residents, clients and families and respect the importance of privacy. We understand the responsibility that access brings and are committed to using such information legally and with integrity. | We do not gossip and do not share personnel information carelessly, maliciously or in a way that could harm others or our reputation. We do not share the personal details or images of residents or clients without permission, or unless required under applicable legislation. |
| Complaints, compliments and feedback are an opportunity to keep on improving | We take complaints and feedback seriously and promptly act on matters concerning the quality of care. Complaints are an opportunity to understand another point of view and to make changes. Sharing compliments ensures we show appreciation for the efforts of our people and benefits others to continually improve our service. | We listen to concerns with an open mind. We respond to complaints effectively and promptly, so the matter is dealt with and resolved respectfully. We escalate complaints appropriately. We participate in investigations with an open mind. We do not make excuses. We respond to queries appropriately and strive to ensure all our residents and clients are satisfied with our behaviour, responsiveness and work quality. |

4. CONDUCTING OUR BUSINESS

4.1. We comply with laws, regulations and Regis policies / procedures

You should be aware of, and comply with, your obligations under all laws, regulations and our policies and procedures relating to your work.

4.2. We meet all requirements related to fair trading and dealing in Regis securities

We are committed to upholding fair and ethical securities trading practices, complying with all laws and avoid any conflicts of interest. Our people must not engage in insider trading of Regis' securities.



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You should familiarise yourself with our Policy for Dealing in Securities and ensure you act in accordance with it in if trading in Regis securities.

4.3. We avoid actual, perceived or potential conflicts of interest

You may have a conflict of interest in the course of your employment or engagement with Regis, if:

- any of your decisions lead to an improper gain or benefit to you or your associate; or
- your personal interests, the interests of an associate, or relative, or obligation to some other person or entity, conflict with your obligations to Regis.

By properly notifying any actual, apparent or potential conflicts of interest, you will protect yourself and Regis from claims of improper conduct or favouritism.

| Always | Never |
|--|--|
| <ul style="list-style-type: none"> • report any conflicts of interest (actual, perceived or potential). • if you're not sure whether a conflict of interest exists, discuss the matter with your Manager. • comply with relevant policies including our Gift Policy, Family Employment Policy, Entertainment Policy, and Conflict of Interest Policy. | <ul style="list-style-type: none"> • solicit or request any gift or benefit in connection with your position. • pay or receive any bribes, facilitation payments, inducements or commissions, intended to improperly obtain favourable treatment or avoid unfavourable circumstances. • give or receive any unreasonable gifts or otherwise act in an unethical way. Remember that agreeing not to act may have the same ramifications as acting in an unethical way. |

If another employer employs you, or if you are involved in a business outside of Regis, these roles must not interfere with your obligation to Regis.

Regis Employees must not be employed by or provide services to any person, company, or organisation that you deal with as part of your job with Regis. In all other cases, you must first disclose the arrangement to your manager and obtain written approval.

4.4. We use company property and assets respectfully and lawfully

You are responsible for protecting any our Property and assets that you use to avoid damage, loss, theft and unauthorised use.

| Always | Never |
|---|--|
| <ul style="list-style-type: none"> • use property and assets properly and for the purposes they are designed to be used. • exercise good judgement and should not abuse any privileges or benefits which you might receive as an employee of Regis. | <ul style="list-style-type: none"> • use property and assets for any unlawful purpose or unauthorised personal benefit. • remove Company property and documents from official premises without a good and proper reason. If required to be removed, they should be stored in a secure manner and covered by appropriate insurances. • loan, borrow, donate, sell, or dispose of any Regis property. • take part in theft, fraud, embezzlement, extortion, or misappropriation of Regis property. • use Regis credit cards for personal purchases. |



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4.5. We meet all privacy laws & regulations, and maintain trust

Through your work, you may have access to confidential and / or private information. This must be treated with the utmost respect at all times.

| Always | Never |
|--|---|
| <ul style="list-style-type: none"> ensure you comply with the Privacy Policy when you collect, use, disclose or store personal information. only collect, use, and retain personal information that is necessary for legitimate business activities. only use personal information for the purpose for which it was collected unless otherwise approved by the individual or required by law. | <ul style="list-style-type: none"> provide personal information to anyone (including other Regis People) without proper authorisation. access personal information unless you are authorised to do so and have a clear business need for that information. remove, copy or share confidential, personal information without prior written consent. |

4.6. We protect Company Confidential Information

You must treat all information you deal with as Confidential Information. You must not provide confidential information to anyone outside Regis unless as required by law or other relevant policy. In some cases, you must not discuss confidential information with other Regis People.

| Always | Never |
|--|---|
| <ul style="list-style-type: none"> lock documents containing Confidential Information in a secure area (for example, a filing cabinet or secure storage room) when you leave your desk for any extended time. keep personal and employee information in a secure place or system, including personal and employee information saved on electronic devices such as computers and mobile phones. make sure you receive a signed confidentiality agreement from any prospective suppliers and business partners before providing them with information about Regis. report any misuse of Regis' Confidential Information. | <ul style="list-style-type: none"> discuss potentially Confidential Information or trade secrets with any person, including any of our People, unless a person has a business need to know the information. disclose Confidential Information to the public unless you are specifically authorised to. use Confidential Information or trade secrets to gain a benefit for yourself or for another person. |

4.7. We meet company policies and expectations related to record keeping

Records are essential for quality of care and service and the efficient operation of a business. Sometimes, our business records may be provided as part of regulatory investigation or proceedings. This is why you must ensure the accuracy of all business records, information, and reports you maintain, including email and electronic records.

| Always ensure your records | Never |
|--|---|
| <ul style="list-style-type: none"> comply with any applicable legal requirements, including contents of | <ul style="list-style-type: none"> make false or misleading information regarding a resident or client on any record associated with the care or service. make false entries on expense, asset and liability reports. |



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- | | |
|---|---|
| <ul style="list-style-type: none"> record and retention duration. • honestly and accurately record transactions. • are in reasonable detail and recorded in the proper account and period. | <ul style="list-style-type: none"> • enter false information on time sheets. • alter or falsify quality or safety results. • understate or overstate known liabilities or assets. • fail to record items that should be expensed. • make any entry that intentionally hides or disguises the true nature of any transaction. |
|---|---|

4.8. We comply with our obligations for continuous disclosures

Our Continuous Disclosure Policy supports ensuring compliance with our disclosure and communication obligations under the *Corporations Act 2001* (Cth) and the ASX Listing Rules.

Our People must immediately notify the Company Secretary if they have any information that is, or that may be, Market Sensitive Information.

4.9. We maintain and positively promote our Company reputation

You must not act in any way that could cause harm to Regis's reputation or market position. Media statements and official announcements may only be made by persons authorised to do so.

| Always | Never |
|---|--|
| <ul style="list-style-type: none"> • remember you are responsible for any material you post or publish on any social media forum, including social networking websites, wikis, and blogs. • be factual, professional, and respectful. • follow the External Communications Policy and associated policies. | <ul style="list-style-type: none"> • publicly discuss any matters relating to Regis, including its residents/clients, financial matters, tenders, acquisitions, share price and any other business matters. • represent (or claim to represent) or post/publish any information about Regis on social media. |

5. OUR PEOPLE

5.1. We seek to prevent discrimination, harassment and workplace bullying

Our Workplace Discrimination Harassment and Bullying Policy sets out its commitment to achieving a workplace free from unlawful discrimination, harassment or bullying.

| Always | Never |
|--|--|
| <ul style="list-style-type: none"> • treat others fairly and courteously, and with dignity and respect. • adapt your behaviour and ensure respectful interactions when working with others where sensitivities may exist due to culture, disability, personal circumstances, or religious beliefs. • support your colleagues who may be affected by workplace bullying and harassment to raise a concern through the appropriate channel. | <ul style="list-style-type: none"> • engage in behaviour that could be perceived as violent, abusive, offensive, malicious, threatening or intimidating. • stand by and watch or encourage bullying, harassment or discrimination happening to someone else. • make frivolous or malicious complaints about another person. |

5.2. We are committed to equal employment opportunity, diversity and inclusiveness



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Through our Equal Employment Opportunity Policy, we aim to ensure equal treatment for all our people, regardless of gender, race, ethnicity, religion, age, national origin, or ancestry, physical or mental disability or sexual orientation.

Our Diversity Policy enshrines our commitment to ensuring diversity and inclusion in our workforce. Our diversity makes us stronger and we welcome different views from all our people as this helps to improve the quality of our services.

5.3. We promote workplace health and safety

We are committed to maintaining a healthy and safe working environment for all Regis People. Our goal is to ensure everyone in our Circle of Care is physically and psychologically safe and well.

| The Foundation of Care | Objective |
|---|--|
| Communicate safety to the team | Through consultation with our Circle of Care Committees our Safety and Wellbeing messages keep our teams safe and engaged. |
| Act safely and with wellbeing in mind | To enable Managers and Employees to promote a culture of injury prevention and wellbeing through positive safety behaviours and actions within their Circle of Care. |
| Reduce risks | To identify, assess and manage risks within our Circle of Care to minimise the likelihood and consequences of harm. |
| Environment and equipment safe and available | To ensure our physical working environment is safe, and teams are equipped with the right tools and equipment to keep their Circle of Care safe. |

Preserving and enhancing our Circle of Care is an integral part of how we operate in Regis. We have policies, procedures, and standards across our business which set out our expectations.

All Regis People must follow the workplace safety and security policies and procedures, and must report any actual or potential hazards. By doing this, we can ensure that we protect ourselves, fellow Regis People, our residents and clients, visitors and our business.

5.4. We ensure we are fit for work free from the effects of alcohol or drugs

You must not perform any work for Regis if you are under the influence of alcohol, illegal drugs or any substance that could affect you performing your job safely or effectively.

You must not possess, use or distribute illegal substances in the workplace.

On limited occasions, such as a celebration for a resident or client held in the workplace, alcohol may be consumed, but only if authorised and appropriately supervised. Otherwise, you must not possess, consume or distribute alcohol in the workplace.

For Regis People, our workplaces are smoke-free environments, and we expect Regis People comply with this policy.

6. OUR COMMUNITY



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6.1. We contribute responsibly to the community

We support and encourage you to actively contribute to the needs of the community which may take various forms. If you wish to make a contribution to a cause on behalf of Regis, consult your Manager.

We are committed to open, two-way communication with local stakeholders and we support the development and sustainability of robust regional economies by creating jobs and, wherever practicable, commissioning the local supply of goods and services.

6.2. We strive for environmental sustainability

We are committed to doing business in an environmentally responsible manner and identifying and managing environmental risks that may arise.

You must follow procedures designed to respect and care for the environment as you conduct your work.

6.3. We respect individual political views

We respect and cooperate with government agencies and we aim to have an honest and transparent relationship with them.

You may voluntarily participate in political activities provided that such participation is on an individual basis only and the activities are not being carried out in a manner that could cause someone to believe that your actions reflect the views or position of Regis.

| Always | Never |
|---|---|
| <ul style="list-style-type: none"> make it clear that you are participating on your own behalf and not on behalf of Regis when engaging in political activity. forward all communications and requests for information received by Regis from government agencies and regulatory authorities to the Quality and Improvement team as soon as you receive them. | <ul style="list-style-type: none"> attend political events, including fund raisers, on behalf of Regis, without approval. be involved in political activities that may damage our reputation or create a conflict of interest. use charitable donations as a substitute for a political payment. use another person or use your position in Regis to try to influence another person to make political donations or support to any political parties. |

7. REPORTING A CONCERN

7.1. Reporting channels

You are encouraged to report to your Manager or Senior Manager any behaviour or situation which you believe breaches or potentially breaches the Regis Way, policies or the law.

Alternatively, you can report unacceptable behaviour through any of the following channels:

| | Regis People & Culture | Independent third-party provider STOPline |
|-------|----------------------------|--|
| Email | peopleconnect@regis.com.au | regis@stopline.com.au |
| Phone | (03) 7004 8110 | 1300 30 45 50 (Australia) or +61 3 9811 3275 (Overseas – reverse charges apply) |



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Website <https://www.regis.com.au/prov> <http://regis.stoplilereport.com/iding-feedback>

Post Regis c/o The STOPLine, Locked Bag 8, Hawthorn VIC 3122

Fax Attn: Regis Case Manager c/o The STOPLine +61 3 9882 4480

7.2. Investigations

Investigations into alleged breaches of the Regis Way will be handled in line with our Grievance Policy.

7.3. Whistle-blower protection

We aim to create an environment for our People to raise concerns in good faith about potential breaches of the Regis Way without fear of victimisation or discriminatory treatment.

We will ensure, whenever possible, that your privacy will be protected where you make a report under the Whistleblower Protection Policy.

DEFINITIONS

| Term | Definition |
|------------------------------|--|
| Confidential Information | Confidential Information many include but is not limited to financial information, internal correspondence and correspondence with current or prospective residents and clients, suppliers, regulators and other stakeholders, operating methods, marketing plans, research results, employee data, resident and client information, information about relationships with suppliers and other stakeholders and legal information. Information will be confidential even if it is contained in an email, on a memory stick, or on Regis IT systems. |
| Directors | Directors means directors of Regis Healthcare Limited and Regis Aged Care Pty Ltd. |
| Employee | Employees include all people in a direct employment relationship with Regis. It includes all full time, part time employees employed on either a permanent or maximum term basis and casual employees. |
| Manager | Manager means the direct manager of the Complainant. |
| Market Sensitive Information | Market sensitive information means any information concerning a company that a reasonable person would expect to have a material effect on the price or value of the company's securities. |
| Property | Company property and assets includes cash, securities, business plans, third party information, Confidential Information, intellectual property (including computer programs, software, models and other items), and physical assets, including amongst other things our vehicles, office supplies, equipment, computers, and telephones. |
| Regis People, People | Regis People include directors, employees, agents, contractors (including temporary contractors) and volunteers of Regis, as well as students or interns completing a placement with Regis. |
| Senior Manager | Senior Manager means a Manager two or more reporting levels removed from the Manager. |
| Victimisation | Victimisation means the detrimental or unfair treatment of a complainant, witness, support person because they have made a complaint, or they've assisted in the investigation of a complaint. |
| Regis | Refers to Regis Healthcare Ltd and its subsidiaries |



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KEY LEGISLATION, ACTS AND REFERENCES

- Corporations Act 2001 (Cth)
- Fair Work Act 2009 (Cth)
- ASX Listing Rules
- Aged Care Quality Standards
- Aged Care Quality and Safety Commission Amendment (Code of Conduct and Banning Orders) Rules 2022

LINK TO QUALITY STANDARDS and REQUIREMENTS

| | | |
|------------|--|---|
| Standard 1 | Consumer dignity and choice | 1(3)(a), 1(3)(b), 1(3)(c), 1(3)(d), 1(3)(e), 1(3)(f) |
| Standard 2 | Ongoing assessment & planning with consumers | 2(3)(a), 2(3)(b), 2(3)(c), 2(3)(d), 2(3)(e) |
| Standard 3 | Personal care and clinical care | 3(3)(a), 3(3)(b), 3(3)(c), 3(3)(d), 3(3)(e), 3(3)(f), 3(3)(g) |
| Standard 4 | Services and supports for daily living | 4(3)(a), 4(3)(b), 4(3)(c), 4(3)(d), 4(3)(e), 4(3)(f), 4(3)(g) |
| Standard 5 | Organisation's service environment | 5(3)(a), 5(3)(b), 5(3)(c) |
| Standard 6 | Feedback and complaints | 6(3)(a), 6(3)(b), 6(3)(c), 6(3)(d) |
| Standard 7 | Human resources | 7(3)(a), 7(3)(b), 7(3)(c), 7(3)(d), 7(3)(e) |
| Standard 8 | Organisational governance | 8(3)(a), 8(3)(b), 8(3)(c), 8(3)(d), 8(3)(e) |

LINK TO RELATED POLICIES AND PROCESSES

Relevant policies are referenced throughout this document and the full list of policies is available on the Regis intranet.

KEYWORDS

Code of Conduct, Governance, The Regis Way, Standards

VERSION HISTORY / AUTHOR / CONTRIBUTORS

| Version | Date Created | Sections Changed | Created/ Amended by |
|---------|--------------|--|--|
| 2 | August 2017 | Reviewed for content. Changes made to better illustrate the standard of conduct expected, and also to reference a number of current Regis policies | Company Secretary / General Counsel |
| 3 | October 2022 | Reviewed, revised and incorporated the Regis Way (previously separate document) | General Manager – Workforce, Capability & Experience |