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Developed by: People & Culture		22 August 2025
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PURPOSE

The Code of Conduct is intended to promote integrity and ethical behavior and to guide everyone on the expectations of how to behave and conduct business with employees and workers, stakeholders and members of the public. It is designed to help everyone understand the behaviors expected to ensure high quality care and support for our people during employment.

EMPLOYEES THIS POLICY APPLIES TO

This policy applies to all people performing work for a Regis group entity as:

- Direct employee (Employee) employed via an employment contract with a Regis Group entity; or
- Indirect employee (Worker) such as an agency worker, contractor, sub-contractor, student, trainee or unpaid volunteer, suppliers and other associated providers, shareholders, in a Regis Group entity workplace.

POLICY

1. INTRODUCTION

1.1. Our Purpose, Values and Behaviours

At Regis, our purpose is to deliver personalised and respectful care that embraces the experience of ageing. We are guided by four core values that shape how we work and interact every day:

- Optimism – We approach each day with enthusiasm and a positive outlook
- Passion – We are committed to making a meaningful difference in the lives of those we care for
- Integrity – We act with professionalism and uphold the highest ethical standards in all that we do
- Respect – We listen actively, communicate politely, and treat every individual with courtesy and dignity

2. LEADERSHIP COMMITMENT

Our Board, executive and management team are responsible for:

- acting in accordance with the law and policies 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.

3. DELIVERING CARE AND SERVICE TO OUR RESIDENTS AND CLIENTS

At Regis, all employees and workers have a duty of care to ensure the safety, dignity, and wellbeing of our residents and clients. This includes taking reasonable steps to prevent harm, delivering services that meet assessed needs, and respecting individual rights and choices.

All care and services must be provided in accordance with:

- The Aged Care Code of Conduct
- The NDIS Code of Conduct
- The Aged Care Quality Standards
- Relevant legislation and industry standards
- The Regis Quality and Clinical Governance Framework

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Regis People must always:

- Act in a way that protects residents and clients from harm, including abuse, neglect, exploitation, discrimination, and violence
- Support consumer dignity, choice, and rights to self-determination, cultural identity, and privacy
- Maintain a safe and home-like environment, recognising that our workplace is the resident's or client's home
- Handling personal and confidential information lawfully and respectfully, in accordance with the Privacy Policy
- Respond to complaints and feedback constructively and promptly, and escalate concerns appropriately
- Participate in ongoing training and development to maintain contemporary skills and uphold care standards
- Collaborate respectfully with colleagues to ensure consistent, high-quality service delivery

4. CONDUCTING OUR BUSINESS

Regis is committed to ethical, lawful, and responsible business conduct. All employees must act in accordance with applicable legislation, including the Corporations Act 2001 (Cth), ASX Listing Rules, and Privacy Act 1988 (Cth), as well as Regis's internal policies and procedures, and related governing policies such as The Code of Conduct for Aged Care.

4.1. Compliance, Fair Trading, and Ethical Conduct

Employees and workers must comply with all laws, regulations, and Regis policies relevant to their role. This includes upholding fair trading practices and avoiding insider trading, as outlined in the Policy for Dealing in Securities. Any market-sensitive information must be reported immediately to the Company Secretary in line with our Continuous Disclosure Policy.

4.2. Conflicts of Interest and External Engagements

Employees and workers must avoid actual, perceived, or potential conflicts of interest. These may arise when personal interests interfere with professional duties or result in improper gain. All conflicts must be disclosed to your Manager. External employment or business interests must not interfere with your role at Regis and require prior written approval.

Compliance with the Conflict of Interest Policy, Gift Policy, Recruitment Policy, and Travel and Entertainment Policy is mandatory. Soliciting or accepting unreasonable gifts, bribes, or inducements is strictly prohibited.

4.3. Responsible Use of Company Resources and Information

Company property, assets, and information must be used lawfully, securely, and only for authorised purposes. Employees must not misuse, remove, loan, sell, or dispose of Regis assets without approval. Personal use of company credit cards or involvement in theft, fraud, or misappropriation is prohibited.

4.4. Record Keeping and Information Integrity

Accurate and honest record keeping is essential to our operations and regulatory compliance. Employees must ensure all records, including care documentation, financial reports, and communications are complete, truthful, and maintained in accordance with legal and company standards. Falsification, manipulation, or omission of records is strictly prohibited.

4.5. Reputation and Communications

Employees must act in ways that uphold Regis's reputation. Public statements and media communications may only be made by authorised personnel. Social media use must be factual, respectful, and aligned with the Corporate Communications Policy. Confidential or sensitive business matters must not be discussed publicly or online.

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5. OUR PEOPLE

5.1. Respectful Workplace

Regis is committed to a workplace free from discrimination, harassment, and bullying. All employees must act in accordance with the Workplace Discrimination, Harassment and Bullying Policy, treating others with dignity, fairness, and respect. Behaviour that is abusive, offensive, or intimidating towards colleagues, residents, or clients, is not tolerated. Employees are expected to support affected colleagues, and report concerns through appropriate channels.

5.2. Equal Opportunity, Diversity and Inclusion

We uphold the principles of equal employment opportunity and are committed to building a diverse and inclusive workforce. In line with our Recruitment Policy and Diversity and Inclusion Policy, all individuals are treated fairly, and diverse perspectives are valued as essential to delivering high-quality care.

5.3. Health, Safety and Wellbeing

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

All Regis employees and workers must follow the Work Health, Safety and Injury Management Policy 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. Fitness for Work

All Regis employees and workers must be fit to perform their duties safely and effectively. In accordance with the Drug and Alcohol Policy, employees and workers must not be under the influence of alcohol, illegal drugs, or any substance that may impair performance. Possession, use, or distribution of illegal substances is strictly prohibited. Regis workplaces are smoke-free.

6. OUR COMMUNITY

6.1. Community Engagement

Regis supports responsible contributions to the community. Employees and workers may participate in initiatives with managerial approval. We foster local partnerships and promote regional economic growth through job creation and local procurement.

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. Environmental Sustainability

We are committed to environmentally responsible practices. Employees and workers must follow procedures that support sustainability and reduce environmental impact.

6.3. Political Neutrality

Employees and workers may engage in personal political activities, provided these activities:

- Do not conflict with Regis' values;
- Are conducted independently and not in a manner that implies endorsement or representation by Regis;

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and

- Do not create the impression that the views expressed are those of Regis.

Employees must ensure their actions remain separate from their professional role and avoid any suggestion that their personal political views or activities reflect the position of the organisation.

7. NON COMPLIANCE WITH CODE OF CONDUCT

The Code of Conduct outlines the expectations and regulates the behaviour of all Regis employees and sets the standards of behaviour that form part of each employee's employment conditions.

The Code of Conduct for Aged Care, in conjunction with the Aged Care Act 2024 (Cth), enables regulatory action to be taken against employees who fail to comply with the expected standards of behaviour outlined.

8. REPORTING A CONCERN

You are encouraged to report any behaviour or situation that you believe breaches, or may breach, Regis policies or any laws to your Manager or Senior Manager.

You can report unacceptable behavior to People & Culture team via peoplehub@regis.com.au. People & Culture team will investigate the concerns in accordance with the Grievance Policy and Managing Misconduct Policy.

Alternatively, if you wish to speak up and make a protected disclosure about unlawful conduct or other instances of misconduct and serious misconduct, you can report the breach in accordance with the Whistleblower Protection Policy.

DEFINITIONS

Term	Definition
Confidential Information	<p>Confidential Information may 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.</p> <p>Information will be confidential even if it is contained in an email, on a memory stick, or on Regis IT systems.</p>
Employee	<p>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.</p>
Worker	<p>An agency worker, contractor, sub-contractor, student, trainee or unpaid volunteer, suppliers, shareholders, in a Regis Group entity workplace</p>
Manager	<p>Manager means the direct manager of the Complainant.</p>
Property	<p>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.</p>

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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.
Regis	Refers to Regis Healthcare Ltd and its subsidiaries

KEY LEGISLATION, ACTS AND REFERENCES

- Corporations Act 2001 (Cth)
- Fair Work Act 2009 (Cth)
- Aged Care Act 2024 (Cth)
- ASX Listing Rules
- Aged Care Quality Standards
- [Code of Conduct for Aged Care](#)
- [NDIS Code of Conduct](#)

LINK TO STANDARDS

Standard 1	The Individual	<input checked="" type="checkbox"/>
Standard 2	The Organisation	<input checked="" type="checkbox"/>
Standard 3	The Care and Services	<input type="checkbox"/>
Standard 4	The Environment	<input type="checkbox"/>
Standard 5	Clinical Care	<input type="checkbox"/>
Standard 6	Food and Nutrition	<input type="checkbox"/>
Standard 7	The Residential Community	<input type="checkbox"/>

NDIS	Core Module - Rights and Responsibilities	<input checked="" type="checkbox"/>
NDIS	Core Module - Provider Governance and Operational Management	<input type="checkbox"/>
NDIS	Core Module - Provision of Supports	<input type="checkbox"/>

LINK TO RELATED POLICIES AND PROCESSES

- [Conflict of Interest Policy](#)
- [Gift Policy](#)
- [Recruitment Policy](#)
- [Travel and Entertainment Policy](#)
- [Whistleblower Protection Policy](#)
- [Corporate Card Policy](#)
- [Privacy Policy](#)
- [Corporate Communications Policy](#)
- [Workplace Discrimination, Harassment and Bullying Policy](#)
- [Diversity and Inclusion Policy](#)
- [Work Health, Safety and Injury Management Policy](#)
- [Drug and Alcohol Policy](#)

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- [Grievance Policy](#)
- [Managing Misconduct Policy](#)

KEYWORDS

Conduct, values, duty of care, behaviour, standards, compliance

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
4	September 2024	Additional information included in Section 3 Delivering care and service to our residents and clients regarding duty of care and removal of paragraph from Section 5.4	Chief People Officer
5	July 2025	Reviewed and revised.	P&C Operations