ICARE CODE OF CONDUCT AND ETHICS

How we care for the people of NSW, building confidence and trust so our communities can thrive.

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A MESSAGE FROM OUR CEO & MD

At icare, we offer more than just insurance. Within our schemes, we insure, protect and care for millions of people of NSW, building confidence and trust so our communities can thrive. This cannot be achieved without keeping our values top of mind – they remind us to make the right decisions every day and help us deliver better outcomes for those we serve, our people and the broader community. Our Code of Conduct and Ethics brings these values to life, setting out expectations and providing clear guidance so that we can always fulfil our commitments.

No one is above the Code, and no one should ask you to do anything that would breach the Code. At times you may be faced with making difficult decisions and it may not always be clear what the right course of action is. This is when you should rely on the guidance set out in this Code and seek help if you are still unsure.

Richard Harding

OUR PURPOSE AND VALUES

It is important that everyone at icare understands our Values and expectations and takes personal accountability for their actions and behaviours. We believe that the behaviour you walk past is the behaviour you accept. This reinforces our position that it is each and every person's role at icare to maintain behaviour that upholds our Values, respects each other and those we serve, complies with our policies and procedures, and encourages an environment of integrity and accountability.

Those we serve are the businesses and agencies we provide services to and the people we care for.

Our Purpose is why we are here. It defines our reason for doing what we do.

Our Values are Together, Ownership, Driven, Curious and Passionate. They embody who we are and guide us as we work together to manage the workplace and the environment that we contribute to and operate within. We set out below a brief explanation of each of the Values and how they apply to our experience at icare:

TOGETHER

OWNERSHIP

DRIVEN

CURIOUS

PASSIONATE

→ We are at our best when we work together, support one another, and celebrate each other's achievements.

→ We are accountable for the outcomes we deliver today and in the long term.

→ We have the courage to set challenging goals, see them through and make a difference.

→ We are inquisitive and open to ideas, learning from successes and failures to drive constant improvement.

→ We are passionate about putting ourselves in the shoes of those we serve.

To help you to identify the types of behaviour we expect at icare and how our expectations align with our Purpose and Values, please refer to the table below.

Purpose	We care for the people of NSW, building confidence and trust so our communities can thrive				
Values	**Together** We are at our best when we work together, support one another, and celebrate each other's achievements.	**Ownership** We are accountable for the outcomes we deliver today and in the long term.	**Driven** We have the courage to set challenging goals, see them through and make a difference.	**Curious** We are inquisitive and open to ideas, learning from successes and failures to drive constant improvement.	**Passionate** We are passionate about putting ourselves in the shoes of those we serve.
Behaviours that Support these values	We create a safe, nurturing, and progressive environment We are transparent, collaborative, risk aware and work together to achieve solutions We hold each other to high standards, seeking and receiving honest feedback that supports people to grow We celebrate each other's successes and recognise people's wins We have fun while making a difference in all that we do	We take on the privilege and responsibility for providing care and support to the people we serve We think ahead, plan and identify potential unintended consequences We take action, dealing with people and issues directly doing what we say we will do, delivering on our promise We understand the needs of those we serve and are committed to building a sustainable business, giving those we serve certainty that we will be there for them today and in the future	We know our efforts make a difference, we set ourselves challenging goals and support each other to achieve them We streamline processes to accelerate response times and make it easy to do business with us We take pride in the quality of our work and encourage others to do their best We take calculated risks and lead change	We are curious and relentless in seizing opportunities, trying new things that improve both what we do and how we do it We value and nurture diversity and understand everyone brings something unique to the outcome We feel safe to raise issues, learn from each other and share our successes and failures We share our thoughts and experiences to create better outcomes for people and support decisions once made We think creatively to shape a better experience for those we serve, our customers	We put those we serve at the centre of everything we do We care deeply about delivering great service We ask questions and listen and learn, building understanding and empathy We are focussed on the human impact of our business, knowing those we serve are people like us and are someone's mother, father, sister, brother, uncle, aunty, daughter, son

WHAT THIS CODE OF CONDUCT AND ETHICS MEANS FOR US

This Code complements, and applies equally alongside, the Code of Ethics and Conduct for NSW government sector employees. In addition to complying with the icare Code of Conduct, all employees must also comply with the Code of Ethics and Conduct for NSW government sector employees.

Application of the Code

The Code applies to all icare employees, and anyone who works at icare, including suppliers/outsourced service providers and contingent workers. This includes claims providers and our commercial partners who are responsible for labour hire, professional services contractors and consultants.

Living the Code

- Familiarise yourself with the Code, our Values, Conduct Principles and supporting policies.

- Complete any mandatory training on the Code.

- Proactively promote compliance with the provisions of the Code and icare policies and adopt personal conduct that is consistent with this Code in all aspects of your role and when making decisions.

- Commit to speaking up if you have any concerns. You can find out more on our Speak Up / escalation page.

- Seek assistance when unsure how to implement the Code – if anything is unclear, discuss it with your People Leader or your People and Culture Partner.

Following the Code

- Compliance with our Code is mandatory to ensure that we protect ourselves and those we serve.

- We take our Values and the Code very seriously. Actions or behaviours contrary to this Code can bring icare and individuals into disrepute, undermine productive working relationships in the workplace, hinder delivery to those we serve, and damage public trust in icare and the schemes that icare administers.

- Where someone's actions or behaviours don't align with the principles of this Code, icare will determine the most appropriate course of action at its absolute discretion, and for employees this may result in disciplinary action, up to and including termination of employment.

- We seek to ensure that consequences applied across icare are fair, reasonable and proportionate, taking into consideration individual circumstances and any other relevant factors.

→ MAKING DECISIONS THAT ARE CONSISTENT WITH THE CODE – OUR "GOOD JUDGEMENT TEST"

- Complete any mandatory training on the Code.

- Proactively promote compliance with the provisions of the Code and icare policies and adopt personal conduct that is consistent with the guidance in the Code on Living and Following the Code in all aspects of your role and when making decisions.

- Commit to speaking up if you have any concerns. You can find out more on our Speak Up / escalation page.

- Seek assistance when unsure how to implement the Code – if anything is unclear, discuss it with your People Leader or your People and Culture Partner.

OUR CONDUCT PRINCIPLES

Our Conduct Principles are the outcomes we want to deliver for everyone who trusts in us, whether it be those we serve, our community, or our colleagues.

Our Values guide how we behave. Our behaviours and actions need to be consistent with our key policies – to make this simple we have established three Conduct Principles, each supported by our key policies. The policies referenced in the Code relate to the performance of our roles, and we encourage you to read, understand and follow these policies.

Conduct Principle	Putting those we serve first	Strong corporate compliance and governance	Behave ethically and protect our people
What this means for us	We comply with SIRA's customer service conduct principles: • Being easy to engage and efficient; • Acting fairly, with empathy and respect; • Resolving customer concerns quickly, respecting the customer's time and being proactive; • Having systems in place to identify and address customer concerns; and • Being accountable for actions and honest in interactions with customers.	• We take all reasonable steps to ensure there is no improper use of information, technology, or resources through our role in icare or if seconded to work elsewhere in the NSW Government sector. • We understand and comply with icare's policies, procedures and guidelines that relate to our employment or engagement conditions and the performance of our role. • We comply with lawful and reasonable directions as appropriate	• We take steps to understand icare's strategy, business plans and goals and use them to support role clarity, development and management of performance objectives and their achievement. • We speak up and report misconduct, discrimination, bullying, harassment and incidents. • We take personal responsibility for assessing, avoiding and declaring situations where there is a conflict of interest and report these in accordance with icare's Conflict of Interest Policy, and complying with our professional obligations
Key supporting policies & guidance	• Complaints Policy • Privacy Policy • Remediation Framework • Fair Decision-Making Guidelines • Complex Customer Circumstances Guidelines • Listen, Learn, Act Guidelines	• Risk Management Framework and Policy • Compliance Management Policy • Fraud Corruption and Control Policy • Information Security Policy • Information and Records Management Policy	• Work Health and Safety Policy • Grievance Handling Policy • Recruitment & Selection Policy • Respectful Behaviour Policy • Managing Misconduct Policy • Conflicts of Interest Policy • Gifts and Benefits Policy • Reporting Wrongdoing Policy • Incident and Issue Management and Reporting Policy

[2]https://www.sira.nsw.gov.au/resources-library/law-and-policy-or-corporate/publications/customer-service-conduct-principles

HOW TO SPEAK UP AND RAISE YOUR CONCERNS

"To be able to build confidence and trust, it is critical we know when we need act to resolve challenging issues. For you, this means speaking up when you see something that is not right. We all have a role to play here and I want each and every one of you to feel comfortable in raising issues. It is my commitment to you, that your concerns will be taken seriously and that the organisation will provide you with support."

Richard Harding – CEO and MD, icare

Our actions, behaviours and decisions impact those we serve.

This means we all have a responsibility to speak up honestly and constructively challenge each other, when we think something is not right. This is our expectation for everyone that works for or with icare, and an important part of living our Values.

If you have concerns, see that the standards in this Code or an icare policy are not being met, or are facing a challenging situation, you should know that there are places you can go to for help. There are various ways you can 'speak up'. These include:

a) If appropriate, speaking up and saying that it is not okay.

b) Speaking to your People Leader or the Group Executive of your area;

c) Speaking with your People and Culture Partner;

d) Phoning or emailing icare's externally managed Speak Up Hotline, which provides an independent and confidential service.

If you believe it may be something that would be defined as wrongdoing, corrupt conduct, fraud or breaches of compliance obligations, contact your People Leader, one of our Public Interest Disclosure Officers, or send an email to icare.speakup@coreintegrity.com.au (emails to this address can be treated confidentially and your anonymity can be protected as far as possible) and let them know what you have experienced or witnessed.

If the matter is serious, remove yourself from harm in the first instance before escalating the issue.

If you see something that nearly went wrong (a 'near miss') or something just 'doesn't feel right' we want to hear about it so we can support you and make icare a better workplace for everyone.

We also encourage you to raise any risks or potential incidents in Risk Connect, available on **Hugo**.

If in doubt, please report.

Please scan the QR code to access the Speak Up Hotline.

ROLES AND RESPONSIBILITIES

At icare, we believe it is important for all of us, especially our leaders, to lead by example and to demonstrate our commitment to our Values, Purpose and Conduct Principles in all that we do.

Role	Responsibilities
All icare employees	• Conducting themselves in accordance with this Code, other icare policies and the law • Completing all mandatory essentials training associated with this Code and related policies • Seek assistance when unsure about how to apply this Code • Speaking up when you hear or see something that isn't right • Reporting wrongdoing to the appropriate internal and/or external authority
People Leaders (in addition to responsibilities as an icare employee)	• Role modelling appropriate standards of behaviour • Provide frontline leadership in creating a culture of ethical behaviour • Taking steps to educate and inform their teams of icare's policy obligations and the law • Intervening quickly and appropriately when they become aware of unacceptable behaviour • Acting fairly to resolve issues and enforce workplace behavioural standards, making sure all relevant parties are consulted and heard • Ensuring anyone who raises an issue or makes a complaint is not victimised and that ethical standards are maintained
Group Executives (in addition to responsibilities as individuals and People Leaders)	• Set the 'tone at the top' by exhibiting a genuine and strong commitment to the ethical standards framework • Receive concerns from people within the function and initiate appropriate responses
Group Executive People and Culture (in addition to responsibilities as a Group Executive)	• Develop and maintain this Code as custodian • Escalate any significant matters to the CEO, Chair or Board, as appropriate • Review the effectiveness of the Code on an annual basis and recommend any changes to the Code to the Board
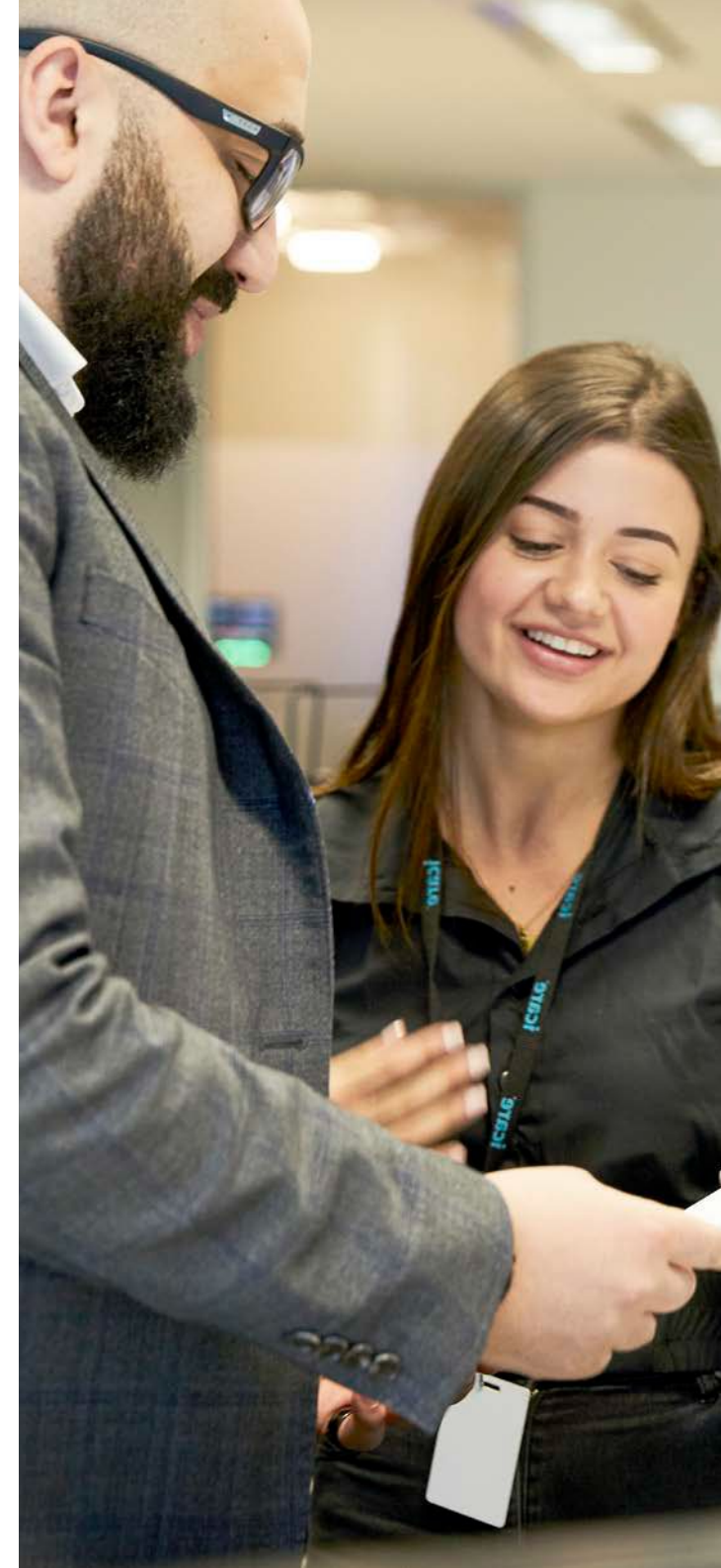
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V4	Group Executive, People and Workplace	Policy updated	23 November 2020
V5	Group Executive, People and Culture	Reformatting policy consistent with the Policy Governance Framework	3 December 2021
V6	Group Executive People and Culture	Updated format and content to better articulate organisational Values, key principles and conduct expectations	February 2023
V7	Group Executive People and Culture	Update to assist icare's reporting culture with reference to SpeakUp and Risk Connect. Review frequency change to Biennial.	February 2024