

Staff Code of Conduct

Landcom

28 March 2024

Issued for: Landcom Staff

Issue date: 28 March 2024

Distribution only: Internal Only

Issued and authorised by: Landcom Board

Version: 5.0

Contents

Purpose.....	4
Application.....	4
Definitions.....	4
Message from the Chief Executive Officer.....	6
Why do we need a Code of Conduct?.....	6
What is expected?.....	6
What is expected of our Staff?.....	6
What is expected of our ExCo and People Managers?.....	7
What if I have a Code-related question or concern?.....	7
Our guiding principles.....	8
We act with honesty and integrity in everything we do.....	8
Conflicts of interest.....	8
Interoffice relationships.....	9
Gifts and benefits.....	9
Volunteering.....	10
External employment.....	10
Participation in political or other activities.....	10
Complying with legislation and policy.....	11
We build relationships, treating all others with respect and dignity.....	11
Respect and inclusion.....	11
Bullying, Harassment and Victimisation.....	12
Sexual Discrimination and Harassment.....	12
We ensure the safety and wellbeing of ourselves and others.....	12
We respect confidentiality and use information appropriately.....	13
Confidentiality of information.....	14
Protecting personal information.....	14
Protecting our Intellectual Property.....	14
Misuse of information.....	15
Security and management of records and information.....	15
Signing documentation.....	15
Providing references.....	16
Industry Engagement.....	16
Media or press communication.....	16

Social media	17
Lobbyists	17
We use and manage public resources economically and efficiently	17
Delegations of Authority	17
Use of resources	17
Procurement	18
We hold each other accountable to the Code of Conduct	18
Reporting suspected wrongdoing	19
Reporting serious criminal offences	20
Breaches	20
Document Control Table	21

Purpose

The Code of Conduct supports us in how we put our Landcom values into action to achieve our strategic direction. It sets the expectation that everyone who works for or on behalf of Landcom demonstrates the highest standards of conduct and ethics in the performance of our duties.

Application

This Staff Code of Conduct applies to All Staff, work experience students and volunteers.

Definitions

Term	Definition
Board	means the Board of Landcom
CEO	means the Chief Executive Officer
Code, the Code	means this Staff Code of Conduct
Conflict of Interest	means circumstances in which your personal interests may conflict or appear to conflict with your public duty. It also exists when a reasonable person might perceive that your personal interests could be favoured over your public duties and/or Landcom's interests and your competing loyalties influence you (consciously or otherwise) to pursue a personal benefit for you, your friends, your family or any other parties. In practice, this requires a connection or overlap between those interests and duties
Credit Card	means purchasing cards issued by Landcom
Directors	means a Director on the Board of Landcom
EGM	means Executive General Manager
ExCo	means the Executive Committee of Landcom
GIPA Act	is the <i>Government Information (Public Access) Act 2009 (NSW)</i>
HSE	means Health, Safety & Environment
Intellectual Property	means work produced in the course of employment with Landcom which is Intellectual Property owned by Landcom. This includes written works, the creation of templates, plans, concepts or ideas, training materials, manuals, brochures or other subject matter (including any software, products and services)
ICT	means Information & Communications Technology
Key Management Personnel	means Staff identified as an Officer of Landcom for the purposes of annually completing a Related Party Declaration
Management	collectively means Staff employed to assist the CEO with the day to day management of Landcom
NSW Privacy Legislation	means the <i>Privacy and Personal Information Protection Act 1998 (NSW)</i> and the <i>Health Records and Information Privacy Act 2002 (NSW)</i>
Our or ours	means Landcom and what belongs to, or is unique to our organisation

Term	Definition
People Manager	means the member of Staff you report directly to
Policy/Policies	refers to a Landcom policy document and any supporting documents including but not limited to plans, procedures or frameworks, all sitting within Landcom's policy framework
PID Act	means <i>Public Interest Disclosures Act 2022</i>
Staff	includes the Board, the CEO, all permanent and temporary employees and contingent workers engaged by Landcom. This term is used for the purposes of this Policy
We	means Landcom collectively as a corporation
WHS	means Work, Health & Safety
Us, You or you	means Staff and others to whom the Code applies

Message from the Chief Executive Officer

As the NSW Government's land and property developer, doing things right is not optional at Landcom – it is the way we conduct business. For this reason, we set the bar high in the way we approach our work, and we measure everything we do against the highest possible standards of ethical conduct.

The Staff Code of Conduct outlines the commitments you make when you agree to work for or on behalf of Landcom.

It guides you to navigate the framework of policies, legislation, principles, values & behaviours and practices so you always make the best decision. Being a valued member of the Landcom team you have a personal responsibility to incorporate the principles of the Code and our culture into your work. Being part of the team also means you have support around you – we are all responsible for enabling each other to put these principles into practice.

This Code is issued with the full support of the Landcom Board and ExCo, who take adherence to the Code very seriously. We rely on all Landcom Staff to be diligent and committed to upholding the Code. This includes addressing any concerns or violations as soon as they arise, without exception. It also means maintaining an environment which enables people to raise concerns and 'speak up' without fear of retribution. We will not tolerate any negativity towards Staff who raise legitimate compliance concerns in good faith.

On behalf of our Board and ExCo, I thank you for upholding the Code and using it to build on our strong reputation.

Alexander Wendler

Chief Executive Officer

Why do we need a Code of Conduct?

The Code of Conduct is one of the ways we put our Landcom values into action to achieve Our Strategic Directions. It sets the expectation that everyone who works for or on behalf of Landcom demonstrates high standards of conduct and ethics in the performance of our duties.

Working in conjunction with Landcom's policy framework, the Code guides you through the factors you need to consider in how you approach your work. It is important that you understand and follow the Code to preserve our reputation for ethical and principled behaviour.

What is expected?

What is expected of our Staff?

As part of the Landcom team, public trust in Landcom can be affected by your actions at work and, in certain circumstances, by your conduct outside the workplace. You are therefore responsible for reading and understanding the Code, the associated policies and all specified mandatory training. You are also responsible for applying the principles and spirit of the Code and Policy framework.

The Code is a great resource, but it doesn't cover every situation you may face. It's important that you use good judgment in everything you do. Always ask for help from your People Manager if you are unsure of what behaviour or action is expected.

For Staff, failure to follow the Code may result in a range of disciplinary action, including termination of employment.

What is expected of our ExCo and People Managers?

If you are a member of ExCo or a People Manager, you have the additional responsibility of:

- Helping our people understand and follow their responsibilities under the Code and our Policy framework;
- Ensuring the Staff you are responsible for complete the agreed mandatory training encompassing standards of behaviour, legislation, policies and processes;
- Creating an environment that reinforces ethical conduct and helps our people feel comfortable to raise concerns without fear of retaliation;
- Evaluating Staff conduct in relation to the Code and other company policies;
- Taking action to prevent and stop violations of the Code, our Policies and the law; and
- Supporting and enabling the escalation of issues through the relevant channels where necessary.

If anyone raises a concern that may require investigation under the Code, seek guidance from the People & Culture team or the EGM Legal & Compliance. For additional assistance or guidance, you can also refer to the relevant Landcom Policy on the Hub.

Failure to undertake any responsibilities outlined in the Code can result in disciplinary action, including termination of employment or termination of your relationship with Landcom.

What if I have a Code-related question or concern?

If you have a question or concern, contact your People Manager, the EGM Legal & Compliance or the People & Culture team.

Landcom prohibits retaliation or reprisal against any person who reports or participates in an investigation of a possible violation of the Code, Policies, or the law. If you believe you are being retaliated or reprimed against, please contact your People Manager or the People & Culture team. You can also contact the EGM Legal & Compliance or the Speak Up hotline if you require alternative methods of reporting retaliation or reprisal.

Our guiding principles

The Code operates on six guiding principles that inform every decision and action we take:

1. We act with honesty and integrity in everything we do;
2. We build relationships, treating all others with respect and dignity;
3. We ensure the safety and wellbeing of ourselves and others;
4. We respect confidentiality and use information appropriately;
5. We use and manage public resources economically and efficiently; and
6. We hold each other accountable to the Code.

We act with honesty and integrity in everything we do

The only way to uphold the trust and confidence in Landcom by our shareholders, stakeholders and the general public, is to always act with honesty and integrity while pursuing your personal and business objectives. This includes complying with any relevant legislative, industrial and administrative requirements and any lawful direction made by a person with the authority to give such a direction.

We expect all Staff to be familiar with and abide by all Policies in operation within Landcom. If you are uncertain as to which Policies or laws apply speak with your People Manager. If you are still uncertain, seek help from Landcom's Legal team or the People & Culture team.

We uphold the highest professional standards in our conduct including:

- Complying with work expectations;
- Complying with Landcom's standards set out in our policies;
- Having clear deliverables and measures in our performance and development plans;
- Treating our staff and others we deal with in a respectful manner;
- Contributing and implementing decisions to the best of our ability; and
- Complying with reasonable requests from your People Manager and those with the appropriate authority.

Conflicts of interest

Handling actual, potential or reasonably perceived conflicts of interest ethically, transparently and honestly is essential in upholding public trust and confidence in Landcom and the NSW Government. While Landcom is committed to providing a fair, ethical and accountable environment for the conduct of its business, the integrity and fairness of Landcom's decisions and actions can be undermined where conflicts of interest are not identified and appropriately managed.

You may be faced with a conflict of interest if competing loyalties influence you (conscious or otherwise) to pursue a personal benefit for you, your friends, or your family at the expense of Landcom. As a member of the Landcom team, your primary business loyalty lies with Landcom and we expect you to avoid conflicts of interest or creating conflicts of interest for others.

The most likely conflict of interest for our Staff will involve land dealings, engaging of consultants, recruitment and selection of Staff. If you intend to undertake a land deal that in any way relates to Landcom, you must gain the prior written approval of the CEO (or the Board in the case of the CEO) as outlined in the *Handling Conflicts of Interest Policy* and any other relevant policy, such as the *Staff Purchase Policy*.

If a conflict of interest arises, be it actual, potential or reasonably perceived, you need to declare it in line with the Policy at the earliest opportunity. Managing conflicts in accordance with Landcom's *Handling Conflicts of Interest Policy* will help to ensure that all decisions made on behalf of Landcom lead to the best possible outcomes and reduce the risk of corrupt conduct.

If you are a Director or a Level 1, 2 or 3 Staff member as defined by the *Delegations Manual*, you must complete an *Annual Declarations of Interests and Associations* on an annual basis. Directors and Key Management Personnel must also complete a *Related Party Transaction Declaration* annually.

Interoffice relationships

Should you be in or enter into a relationship with another member of Staff, it is on the presumption that this relationship is mutual and consensual, with the understanding that neither party will engage in inappropriate conduct within the workplace should the relationship end or change.

Relationships between Staff members in inherently unequal positions where one Staff member has real or perceived authority, influence, or power over the other's conditions of employment or has the ability to directly impact the other's career progression or remuneration, are strongly discouraged. This include both informal and formal supervisory relationships.

If you are related to another member of Staff or in a relationship, this may give rise to an actual, potential or perceived conflict of interest, and you must declare the relationship in accordance with the *Handling Conflicts of Interest Policy*.

Should you have any questions, please contact the People & Culture team or the EGM Legal & Compliance.

Gifts and benefits

Receiving gifts, benefits or hospitality may be perceived as having an undue influence on the work we undertake and has the potential to compromise current and future impartial decision making. By complying with the *Gifts & Hospitality Policy* you minimise this risk.

Most gifts and benefits are intended simply as a memento or a small token of appreciation. However, sometimes hospitality or a gift or benefit may be offered to influence Staff, in their capacity as a public official, in making a decision, or to provide a favour which will advance the interests of the giver, either now or in the future.

If you are offered a bribe (i.e. anything given in order to persuade you to act improperly), you must:

- Refuse it;
- Indicate it is not appropriate; and

- Immediately report the matter in line with the *Fraud Control & Corruption Prevention Policy*.

Any attempt to bribe Staff and/or the acceptance of a bribe, is corrupt conduct and must be reported. It may also constitute a criminal offence.

Volunteering

Getting involved in community affairs through non-profit charitable, social or sporting bodies has many benefits and is something we actively encourage. However, you must only get involved where no real or perceived conflict of interest is involved.

In most circumstances, you don't need to seek approval to volunteer outside of work. However, you will need approval from your EGM if volunteering has the potential to conflict with or affect you in performing your official duties, or if Landcom provides funding to the organisation.

External employment

If you are a permanent Staff member working either full-time or part-time, you must seek written approval from the CEO (or the Board in the case of the CEO) to undertake private paid or unpaid employment, consulting work and/or external directorships in addition to your role at Landcom. This includes external employment or consulting work on a temporary, fixed term, or regular basis. The only exception is if you are working as an employee or director for a company owned by immediate family or charitable organisation, unless this creates a real, perceived or potential conflict.

At all times, you must avoid participating in any business activity or employment outside Landcom which could adversely affect performance of your duties, or which may give rise to a real, perceived or potential conflict of interest without the CEO's explicit signoff.

When contemplating or accepting a new job offer, you need to be aware of and maintain the terms of employment and related responsibilities relating to the cessation of your employment with Landcom.

Participation in political or other activities

You have a right to participate in political and community activities and to pursue private interests, provided that participation does not interfere with your official duties or create a conflict with your duty to serve the Government of the day in a politically neutral manner.

If engaging in these activities, consideration is to be given to the *Media & Social Media Policy*.

In determining the extent of any real or perceived or potential conflicts of interest and how to manage any arising conflict, consideration will be given to the nature of the issue, your role, the extent of your participation, and your public prominence.

In some circumstances, Staff may join external industry bodies as volunteers, committee members or chairpersons. In those circumstances, you must notify your People Manager. Where there is the potential for Conflict of Interest, this matter must be referred to the Legal team to assess.

Complying with legislation and policy

Complying with the law and government policy is the right thing to do. Landcom wants to make it easy for every person to do the right thing and embrace a culture where there is no tolerance for wilful or reckless breaches of the law, policies or procedures. However, Landcom also recognises that we operate in a complex legal, policy and process environment where it is not possible for any individual to be an expert in all government requirements.

Policy owners at Landcom have a critical role to play in making information available to ensure we can all do our jobs in a legally compliant way. Policy owners will help you to stay up-to-date as they are responsible for making sure that any legislative or policy changes are reflected in our policies, our procedures and any information developed for Staff and the community.

Policy owners exist both in operational and corporate areas. Anyone may be a policy owner. It is important every person understands who the owners of key policies are, how they can help and, if you are one, your responsibilities.

It is everyone's responsibility to do the right thing and comply with our legal and Policy responsibilities. If you are not sure about an issue, ask your People Manager or a policy owner. People Managers have an important role to play in ensuring their teams are made aware of legal, Policy and budget responsibilities including their delegated powers.

We build relationships, treating all others with respect and dignity

Landcom's success is built on the relationships we form and our trusted reputation. The diversity of thought, ability, and experience we gain through these relationships improves our decision making and enables us to make a difference through the work we do.

Your conduct must not prejudice the operations, security, integrity or reputation of Landcom.

It is up to all of us to continually build relationships and earn that trust by treating our colleagues, stakeholders and members of the public with dignity and respect.

If you deal with vulnerable members of the community, including children under 18 or the elderly, you must treat them with the utmost respect and dignity, offering special care or support in line with their needs and requirements where possible.

Respect and inclusion

Respect and inclusion are fundamental to a harmonious, productive and psychologically safe workplace where people feel safe to speak up about concerns. We're committed to ensuring our workplace is a safe environment in which everyone feels they can achieve their potential. As outlined in the *Discrimination, Harassment & Bullying Free Workplace Policy*, Landcom has no tolerance for bullying or harassment.

We are all responsible for:

- Treating people with dignity and respect, and contributing to a positive and productive workplace;
- Making sure people feel valued and are able to fully participate in the workplace;
- Not discriminating against, harassing or victimising anyone on any grounds as outlined in the *Discrimination, Harassment & Bullying Free Workplace Policy*;
- Demonstrating inclusive behaviours and using inclusive language that respects the diversity of our workplace;
- Creating a workplace that is safe and offers protection from sexual, physical and psychological harassment and exclusion; and
- Preventing bullying.

Bullying, Harassment and Victimisation

Bullying is behaviour that is repeated, unwelcome and unsolicited. It is considered offensive, intimidating, humiliating or threatening by the recipient or others who witness the actions or are affected by them. Landcom has a zero-tolerance approach towards bullying and harassment in the workplace as outlined in the *Discrimination, Harassment & Bullying Free Workplace Policy*.

Bullying does not include reasonable management practices such as performance management and disciplinary procedures, or other reasonable management directions.

Victimisation involves unfavourable treatment of a person because the person has made or been involved in making a complaint about discrimination, harassment or bullying, or participates in an investigation.

A complaint of victimisation can be considered as either a civil or criminal matter. Landcom will act in accordance with the law when it receives a complaint.

Sexual Discrimination and Harassment

Landcom will not tolerate of any form of sexual discrimination or harassment under any circumstance. This includes no tolerance for the use of offensive or suggestive language, sexual banter, and the mistreatment of any person in a position of vulnerability as outlined in the *Discrimination, Harassment & Bully Free Workplace Policy*.

Sexual harassment can be a valid reason for dismissal under the Fair Work Act.

Landcom also recognises its positive duty to prevent sexual harassment in the workplace. Landcom undertakes this through its compliance training, regular and proactive reporting and rapid investigation and management of any known cases of sexual harassment in the workplace.

We ensure the safety and wellbeing of ourselves and others

Landcom is in the business of creating vibrant, thriving communities that look after the wellbeing of its residents. One way we can contribute to this is through our workplace.

We all have a responsibility to ensure our workplace which may be our offices, sales office or a site Landcom is responsible for, is safe and secure and protects our health and wellbeing. We expect everyone to proactively identify, assess, resolve and report risks and hazards. To understand your responsibilities and obligations and ensure compliance with WHS legislation, refer to the *Health, Safety & Environment Management System* which can be found on the Hub and the Policy.

While at work you need to ensure that:

- You are not impaired by the use of alcohol, illicit drugs, or prescribed or over the counter medication;
- The use of any substance does not adversely affect your safety, or the health and safety of others;
- You do not consume alcohol and/or illicit drugs when in control of a vehicle or machinery;
- You follow any legislative and Landcom directions to maintain the health, safety and wellbeing of staff and visitors;
- The use of any prescribed or over the counter medication does not impair your ability to drive or operate machinery; and
- You make alternative arrangements if there is a possibility that you may be impaired.

At Landcom functions and events, whilst the consumption of alcohol is not banned, we expect you to use good judgment and never drink in a way that leads to impaired performance or inappropriate behaviour, endangers the safety of others, or violates the law. Possessing, selling, using, transferring or distributing illegal drugs or controlled substances including steroids while working is strictly prohibited.

Your responsibilities regarding health, safety and the use of drugs and alcohol apply to you in all places of work including Landcom work sites, Landcom functions or events, and the worksites, functions and events organised by Landcom stakeholders.

If you are found to be impaired as a result of being under the influence of illegal, over the counter drugs and/or alcohol, Landcom may suspend you from duty. Disciplinary action may be considered in line with the *Unsatisfactory Performance or Misconduct Procedure*.

We respect confidentiality and use information appropriately

Being in a position of industry leadership and innovation means we attract a lot of attention from people wanting to find out how we deliver our projects. We need to manage this carefully as sharing certain kinds of information prematurely can have a negative impact on our projects, our reputation and our competitive advantage, and can prove costly in other ways.

We each have a responsibility to:

- Not reveal confidential material;
- Properly secure, label, and (when appropriate) dispose of official information and confidential material;

- Only accept confidential, sensitive or personal information if all parties have previously signed an appropriate agreement to enable the sharing of information; and
- Safeguard the personal, sensitive and confidential information we receive from others, particularly under non-disclosure agreements.

Given the potentially complex nature of the relationships we navigate, there will be times when you need to apply your best judgment to determine what information to share and what to keep secure. Where you need support or guidance, please speak to a member of the Legal team or the People & Culture team.

Confidentiality of information

At all times, you must maintain the confidentiality of all official information and documents which are not published or normally made available to the public. This includes Cabinet documents whether they are in draft or published. You need to refer to and abide by the *Records Governance Policy*.

An important piece of legislation you need to be aware of and abide by is the GIPA Act which was established to provide an open and transparent process for giving the public access to NSW government information. All enquiries made under the GIPA Act must be referred to Landcom's Right to Information Officer who can be contacted by email on Right2Info@landcom.nsw.gov.au.

Protecting personal information

Landcom takes the privacy of its Staff, members of the public and its clients and stakeholders seriously and will manage and protect the personal and health information it handles in accordance with the *NSW Privacy Legislation* and Landcom's *Privacy Management Plan*.

You must familiarise yourself and comply with Landcom's *Privacy Management Plan*. You must also complete the required mandatory training. All enquiries relating to privacy must be referred to Landcom's Privacy Officer.

Protecting our Intellectual Property

All work carried out in the course of employment with Landcom is Intellectual Property owned by Landcom. This includes written works, the creation of templates, plans, concepts or ideas, training materials, manuals, brochures or other subject matter (including any software, products and services).

The copyright of material created by you in the course of your work belongs to Landcom, even if the material was developed in your own time or at home or another location.

Your obligation not to disclose information outside Landcom extends to all Intellectual Property owned by Landcom. This means you may not use, deal with or disclose the Intellectual Property outside Landcom without the express written consent of your People Manager, even if you created or produced (either solely or with others) the Intellectual Property. If the Intellectual Property of Landcom is used in a contrary manner, such conduct will be regarded as a breach of this Code. We all have an ongoing duty to protect confidential information that we have had access to through our work, which could include organisational information, information generated by

another party or government agency, or information generated through a recruitment or procurement process.

It is also important that we respect and comply with others' Intellectual Property rights (even if Intellectual Property material is publicly available on the internet, for example). This includes the cultural material of Aboriginal and Torres Strait Islanders. Please contact our Social Sustainability & Partnerships Team if you have any questions relating to cultural material relating to Aboriginal or Torres Strait Islanders.

Misuse of information

You must not misuse your role or your access to Landcom or other government-held information to secure any advantages within or outside Landcom, or to benefit any other person or organisation, including those who have worked for Landcom in the past.

You must exercise care when dealing with former Staff, and make sure you do not give them favourable treatment or access to corporate information. You must report any attempt by a former Staff member to influence you to your EGM or the People & Culture team.

Security and management of records and information

You must ensure that any information in any form (printed or electronic) cannot be accessed by unauthorised persons and that sensitive information is only discussed with persons (inside or outside Landcom) who are authorised to have access to it.

You are not to access information unless it is immediately relevant to the work you are performing. Additionally, you must store records created or received while you are performing your role as per our *Records Governance Policy*. These records are captured in the official system and not destroyed without appropriate authority in line with Landcom Policies.

Management is also responsible for securing offices and premises, and Staff are responsible to ensure that suitable arrangements are in place to maintain security of confidential and sensitive documents, whether on Landcom premises or outside of those premises.

Cyber security is a rapidly evolving challenge. It is important that we take steps to help protect our systems and information. All Staff are required to comply with the *ICT Information Security Policy* and complete relevant mandatory learning modules as well as follow any instructions from the ICT team regarding electronic storage by any means. Staff should report any cyber security concerns to the ICT team immediately.

Signing documentation

Always comply with the *Power of Attorney and Document Execution Policy* and the *Delegations Manual* when requested to sign a document. You must not sign any document which you believe or know has not been approved in accordance with Landcom's Delegation Manual or is not true and correct.

You must not coerce any other Staff member to sign any document that does not meet the above requirements.

Providing references

If you are a People Manager, you may provide an official statement of service or a verbal referee report using verified information as part of the recruitment selection process. You must not include any false or derogatory statements. Providing false and misleading information via a verbal reference may have legal consequences and written references may be accessed or released publicly under a GIPA Act request.

Always consult with the People & Culture team if you are asked to be a referee for a person whom you suspect or are aware is the subject of misconduct action.

Industry Engagement

Staff can engage with industry professionals but should consider whether information provided to one party at an industry engagement may give them a competitive advantage over other industry participants who may not be privy to the same information. If this is the case, the information should preferably not be disclosed, or, if it is, a process be set up that allows for all relevant parties to be privy to the same information.

Confidential information divulged by another party in a meeting should remain confidential within Landcom unless otherwise required by law or policy.

Where formal meetings are held with third parties, they must comply with Landcom's probity requirements. Wherever reasonably practicable, at least two Landcom Staff members should attend formal meetings held with third parties and otherwise in accordance with any probity plans and management actions in place for the relevant interaction.

Informal meetings include phone or video calls, coffee catch-ups and other occasions where the meeting was not formally scheduled. The rules for formal meetings do not apply in these circumstances, however before participating in an informal meeting, Staff should assess if the meeting may reasonably result in a negative perception of influence or improper conduct. Where concerns exist, the Staff Member should seek advice from their People Manager or EGM.

While regular meetings may be held with industry representatives from peak bodies to facilitate the sharing of information, only information that is publicly available may be conveyed in response to individual requests in relation to projects or business opportunities. In circumstances where feedback is sought on government proposals which require the sharing of confidential information, EGM approval is required.

Media or press communication

You are not to communicate with the media/press concerning Landcom's business activities unless authorised to do so. Media enquiries should be directed to the Senior Manager Media & Stakeholder Relations. All communication with the media/press or on official Landcom social media channels must be in accordance with the *Media & Social Media Policy*.

Social media

Staff should refer to the *Media & Social Media Policy* and consider the risks, benefits and implications that may arise from making private statements that relate to their work on social media platforms. Even positive and supportive comments can become contentious when engaging in personal use of social media.

Staff must:

- Not post official Landcom content unless authorised to do so. You can, however, repost, or retweet Landcom posts, material or comment without substantial or meaningful change as part of showing affiliation or support for the organisation;
- Not purport to be communicating on behalf of Landcom in an official capacity;
- Not comment or post any material that might cause damage to Landcom or the NSW Government's reputation; and
- Use a private social media account, established with a private email address.

Lobbyists

You must comply with the *NSW Government Lobbyist Code of Conduct* in connection with the lobbying of NSW Government officials. Landcom will only engage with professional (third-party) lobbyists if they are listed on the *NSW Electoral Commission's Register of Lobbyists*, who will need to declare their status. Please advise your People Manager if you are contacted by a lobbyist or reach out to the Media and Stakeholder Relations team if you have any questions.

We use and manage public resources economically and efficiently

Landcom's ability to deliver projects and create thriving communities depends on how well we manage Landcom's resources.

Delegations of Authority

As custodians of public funds and assets, we all have the responsibility to use Landcom's resources efficiently and effectively for authorised purposes to deliver the best outcomes for the people of NSW. The *Delegations Manual* outlines our delegations of authority to ensure that decisions regarding the use of financial resources are made by those with the required level of responsibility. You need to familiarise yourself with the *Delegations Manual* and comply with the delegations of authority.

Use of resources

Always ensure you make decisions relating to the use of resources, facilities and equipment that are reasonable, appropriately authorised and able to withstand public scrutiny. This includes finances, office facilities, equipment, stationery, motor vehicles, travel, credit cards etc.

Treat Landcom property and assets with care and ensure they are secured against theft or misuse. You also need to ensure the use of any property or assets is lawful, appropriate and ethical and does not create a risk or liability for Landcom. While Landcom carries its own insurance, you must

minimise the risk of loss or damage to official facilities and equipment that are in your personal possession.

Landcom resources and assets must be used for the primary purpose of official business. This includes the use of stationery, letterhead and official logos.

Avoid any personal use of Landcom resources and equipment such as computers and phones in accordance with the *ICT Policy*. If you need to use Landcom equipment for personal purposes, ensure its use is infrequent, brief, involves minimal cost and does not interfere with the performance of your work. This includes all use of Landcom's electronic communication facilities which must be operated in accordance with the *ICT Information Security Policy*.

Use of Landcom facilities and equipment, including software, for private employment or for private financial gain is prohibited. The only exception is where you have been formally contracted to supply services to Landcom. In this case, the use of Landcom's facilities must be specified in the contract.

You must not seek to make private use of the services of other Staff. Politely decline any requests to perform non work-related tasks during work time.

Procurement

Landcom routinely buys (procures) goods and services, to help us conduct our business. This can range from routine office supplies to consultancies and contingent labour. It is important for successful project delivery and for our reputation that public money is spent wisely, ensuring we get value-for-money and receive quality goods and/or services. We expect our Staff to:

- Plan ahead;
- Buy the right thing;
- Use the right process;
- Understand your budget responsibilities;
- Get help if you need it; and
- Make sure you get what you paid for at the agreed price.

Landcom's purchasing practices must be of the highest standard to achieve value for money and ensure that public money is spent appropriately. You are expected to familiarise yourself with and abide by the *Procurement Policy and Procedures* and to comply with them, including those procedures that apply to the type of procurement being undertaken on behalf of Landcom.

We hold each other accountable to the Code of Conduct

Any violation of the Code not only erodes the trust we have built, it also puts our Staff and our business at risk. It also undermines productive working relationships and prevents us from doing our best work. For this reason, every person who works for or on behalf of Landcom is obligated to raise concerns promptly.

Landcom is committed to protecting any person who raises concerns about a breach of the Code or Landcom Policy from retaliation or reprisals. Any attempt to take detrimental action against a

person who raises a legitimate breach of the Code or Policy will be treated seriously and may lead to disciplinary action.

Reporting suspected wrongdoing

Landcom is committed to the highest standards of ethical and accountable conduct and does not tolerate any act of fraud or corruption. Immediate action will be taken whenever fraudulent or corrupt behaviour is detected, reported or suspected.

Landcom's *Fraud Control Framework* and *Fraud Control & Corruption Prevention Policy* provide guidance and assistance to ensure you are aware of your responsibilities regarding fraud and corruption prevention, detection and reporting.

This includes information as to when and how a report should be made and escalated through the appropriate channels, including that you must always report any behaviour that you observe, that you consider, or suspect may be unethical, fraudulent or corrupt.

Please also be aware of Landcom's *Public Interest Disclosures Policy* and the PID Act which provides protection against reprisal if you make a confidential report of serious wrongdoing that you honestly believe, on reasonable grounds, shows, or tends to show:

- Corrupt conduct;
- Serious maladministration;
- Serious and substantial waste of public money;
- A GIPA Act contravention;
- A local government pecuniary interest contravention; or
- A Privacy Policy contravention.

If you are a People Manager and receive a report from a public official (that includes relevant contractors or subcontractors), that might be a voluntary PID, you are responsible for ensuring the report is communicated to Landcom's Disclosure Coordinator or a Disclosure Officer on the reporter's behalf. This action ensures that both you and the reporter receive the special protections against detrimental action under the PID Act.

You can do this by passing on reports you receive to Landcom's Disclosure Coordinator or a Disclosure Officer in accordance with the *Public Interest Disclosure Policy* or by encouraging the reporter to make the report to Landcom's Disclosure Coordinator or a Disclosure Officer. .

Landcom's externally managed "Speak Up" Integrity Hotline is also able to receive reports of serious wrongdoings which may meet the criteria for being a voluntary PID under the PID Act. Reports can be made in writing, orally or even anonymously using one of the five channels available.

Reporting serious criminal offences

If you are charged, convicted or found guilty of a serious indictable offence or any offence which may impact your ability to undertake part or all of the inherent requirements of your role, you must immediately notify your EGM and People & Culture.

A 'serious indictable offence' means an offence punishable by imprisonment for five years or more.

You may be suspended from duty until the criminal charge has been resolved. Landcom may elect to terminate employment on the basis of criminal findings. In such circumstances the CEO will be notified.

Breaches

If you see anyone act in a way that is contrary to the Code, you must report the incident immediately. To do this you can contact:

- Your People Manager;
- People & Culture, in person, or email peopleandculture@landcom.nsw.gov.au;
- A member of the Legal team, or email fraudcontrol@landcom.nsw.gov.au; and/or
- Contact our CEO.

You may also raise your concern anonymously by placing a written account of the incident in the Fraud & Corruption Notification boxes, located in the Parramatta office. You can also access Landcom's confidential Speak up Integrity Hotline where you may raise an anonymous report or disclosure. Please ensure that you provide enough information so that the concern can be addressed appropriately.

If the alleged breach is by your People Manager, then report the incident to a member of ExCo, People & Culture or the CEO.

If you have reported a breach of the Code and feel the report has not been adequately addressed or resolved, you are encouraged to bring the concern to the attention of the CEO directly, who will carefully consider the report and take appropriate action.

Where there are any alleged breaches concerning the CEO, then you can bring this to the attention of the Chair of the Board.

Document Control Table

Document information	
Document approver	Board of Directors
Document owner name	EGM People, Culture & Safety
Document delegate name/s	Director, People & Culture
Document version number	5.0
Document version date	28 March 2024
Document review cycle	Triennial
Next Document review date	28 March 2027
Document location	Internal External
Document level	1= Board approved Policy
Linked artefacts	
Linked documents	<ul style="list-style-type: none"> • Landcom Award • Data Breach Policy • Delegations Manual • Discrimination, Harassment and Bullying Free Workplace Policy • Fraud Control Framework and Fraud Control & Corruption Prevention Policy & Procedure • Gifts & Hospitality Policy • Guidelines for Developing & Implementing a Code of Conduct and Ethics for Public Sector Executives • Handling Conflicts of Interest Policy • Health Safety and Environment Management System • ICT Information Security Policy • Media & Social Media Policy • NSW Government Boards and Committees Guidelines • NSW Government Lobbyist Code of Conduct • Power of Attorney and Document Execution Policy • Privacy Management Plan • Procurement Policy • Public Interest Disclosure Policy • Records Governance Policy • Related Party Declarations Form • Staff Purchase Policy • Unsatisfactory Performance or Misconduct Procedure
Linked legislation	<ul style="list-style-type: none"> • <i>Government Information (Public Access) Act 2009</i> • <i>Health Records and Information Privacy Act 2002</i> • <i>Independent Commission Against Corruption Act 1988</i> • <i>Privacy and Personal Information Protection Act 1998</i> • <i>Ombudsman's Act 1974</i> • <i>State Owned Corporations Act 1989</i> • <i>State Records Act 1998</i> • <i>Work Health & Safety Act 2011</i>

Document information

- *Landcom Corporation Act 2001*
- *Public Interest Disclosures Act 2022*
- *The Sex Discrimination and Fair Work (Respect at Work) Act 2021*

Linked risks

- Reputational
- Regulatory
- Financial

Revision history

Version	Approval date	Author	Description
5.0	28 March 2024	Vidia Henshaw	Review and updated to reflect current practice and legislative references
4.1	June 2022	Communications & Marketing	Chief Executive Officer message update (Alexander Wendler – new CEO)
4.0	28 January 2022	Vidia Henshaw	Review and updated to reflect current practice, procedures, forms and legislative references.
3.0	24 July 2019	Jessica Hill	Review and updated with new branding guidelines
2.0	27 July 2018	Shauna Woodward Carina Carter	Complete review and updating of Code of Conduct
1.0	2015	Carina Carter	Code of Conduct