
Code of Conduct Statement

APNIC Pty Ltd ('APNIC') conducts its business with integrity, honesty and fairness and complies with all relevant laws, regulations, codes and corporate standards.

All APNIC employees and contractors must follow the highest standards of behaviour when dealing with members and each other. Our leaders must encourage a culture where ethical conduct is recognised, valued and followed at all levels.

APNIC actively supports, encourages and develops its employees to work safely, be member focused, use technology and the Company's assets effectively, adapt to changes and improve their own capabilities.

Outcomes

A Code of Conduct is a set of standards and behaviours related to the way we do our work. It puts a responsibility on each of us to use sound judgement. It aims to deliver best practice by ensuring those standards are clear and guided by sound ethics.

The Code does not cover every situation. However, the values, ethics, standards and behaviours it outlines are a reference point to help make decisions in situations it does not cover. If you act in good faith and with the spirit of the Code, you can expect to be supported by your colleagues, your manager and by APNIC.

Applicability

The Code of Conduct applies to everyone within APNIC, from the Director General, through all levels in the organisation. If any particular aspect of the Code is not clear, you should discuss this with your line manager or Human Resources Manager.

Where relevant, the Code applies to consultants, contractors and employees of contractors, and contractors working in the APNIC workplace.

Definitions

'Conflict of interest' means a conflict between an APNIC employee's work responsibilities and their personal or private interests. A conflict of interest can arise from either gaining a personal advantage or avoiding a personal loss. Conflicts of interest can be real (actual) or perceived (apparent).

- A 'real conflict of interest' is a conflict between the employee's duties and their private interests.
- A 'perceived conflict of interest' is the perception that an employee's private interests could improperly influence them at work, as judged by a reasonable person.

'Interests' can be financial, non-financial, personal, private, family or business.

A 'financial interest' is when the employee could gain a personal financial benefit including having shares, receiving gifts, benefits or bribes or receiving hospitality or travel.

'Limited Personal Use (Electronic Mail and World Wide Web)' means the following:

- Use that is infrequent and brief and is performed during the employee's non-paid time. That is, before and after work and during lunch breaks.
- Personal use is activity conducted for purposes other than undertaking official business, professional duties, and/or professional development.
- Personal use refers to personal related activities which do not interfere with the operations of APNIC.

Examples of permitted limited personal use of the Internet include:

- Internet access that is incidental to employment or personal business transactions such as accessing online banking and bill paying.
- Participation in approved online training or personal development programs.
- Sending or receiving infrequent personal messages by email, providing the content of the message does not breach APNIC's Code of Conduct.

Examples of limited personal use of the Internet that is NOT permitted (not an exhaustive list) include:

- Gambling (including gaming, online betting, bookmaker odds, lottery pages, bingo, football tipping).
- Games (including traditional board games, card games and role playing games, for example, Battleship and Dungeons and Dragons).
- Participation in online auctions (including eBay).
- Dating (including online dating services).
- Downloading and storage of music and pictures.
- Accessing, downloading, storing or sending racially and/or sexually offensive, obscene and/or other threatening, belligerent or libellous electronic communications.

Procedure Requirements

1. *Respect for persons*

Standards of conduct

(i) Member service

- All APNIC employees must strive to provide excellent member service by treating other employees and members of the public with honesty, fairness, sensitivity and dignity.
- Members have a right to complain or criticise APNIC. While you must make all reasonable efforts to help members lodge complaints, if you think a situation is threatening or intimidating, you are entitled to withdraw. If in doubt, ask for help from a more experienced colleague, or a manager.
- APNIC will support any employee who believes they are under threat from a member of the public.

(ii) Behaviour towards each other

- We must all treat each other with trust, respect, honesty, fairness, sensitivity and dignity. Employees who supervise or manage other employees have a special responsibility to model this kind of behaviour, and to ensure that the people they supervise understand the standard of performance and behaviour that is expected of them.
- You need to accommodate and respect different opinions and perspectives, and manage disagreements by rational debate. You must not behave towards any other person in a way that could be perceived as intimidating, overbearing or bullying.
- Effective teamwork is an essential part of a productive workplace culture. Each team member needs to work co-operatively with fellow employees and actively and willingly take part in team activities (e.g. meetings).

(iii) Non-discriminatory workplace

- APNIC is committed to creating and maintaining a workplace free from unlawful discrimination. By law, all employees must ensure that discrimination is not part of our workplace or our practices.

(iv) Sexual and other harassment

- APNIC is committed to preventing harassment of employees and the public. All employees need to contribute to building a workplace that tolerates differences and which is free from intimidation, bullying and harassment.

(v) Privacy

APNIC has information about individuals, businesses and commercial issues which is private and sensitive and which could be harmful if released. Employees should only access information and records they require in the course of their duties.

Employees must keep this information confidential at all times. You can maintain privacy by:

- taking care about discussing work matters with anyone not entitled to know such information;
- taking responsibility to safeguard confidential files and information;
- not disclosing system passwords to others;
- enforcing rules about storage of information over time; and
- referring all media enquiries to your manager.

2. Integrity

Standards of conduct

(i) Conflict of interest

- When making decisions, you must declare any conflict of interest.
- A conflict of interest involves a conflict between your duties and responsibilities when employed by APNIC and your private interests. A conflict of interest can arise from avoiding personal losses as well as gaining personal advantage – whether financial or otherwise. This includes advantages to relatives and friends.
- If you believe you have a conflict of interest, whether real or perceived, tell your manager promptly.
- Until the matter is resolved, make sure you are not part of any decision-making processes related to the matter.
- If you feel you have a conflict of interest between professional and corporate values, discuss it with your team manager.

(ii) Influences on decision-making

- You must not influence any person in an improper way to try to obtain any advantages or favours.
- All decisions need to be, and be seen to be, fair and transparent. This can be achieved in a number of ways, including clear record-keeping and showing how decisions were made.
- You must not in any way misrepresent your qualifications, experience or expertise in any recruitment and selection process.

(iii) Accepting gifts and benefits

- Occasionally you could be offered gifts or benefits from people with whom you do business. You can accept gifts or benefits in certain circumstances, however you must not accept any gifts or benefits if there is a possibility that in doing so, you could create a real or perceived conflict of interest.
- Your manager can advise you about the receipt of gifts, gratuities and benefits.

(iv) Employment outside APNIC

Some employees, particularly those who have casual or part-time employment with APNIC, may wish to pursue additional employment outside the organisation. It is not APNIC's intention to stop people from holding secondary employment, as long as the following requirements are met. Approval is automatically granted for you to undertake secondary employment outside of your normal working hours under the following conditions:

- That no conflict of interest exists or develops, between the secondary employment and your employment with APNIC; and
- That your secondary employment has no effect on the performance of your duties while employed by APNIC. This includes effects from a safety/fatigue management perspective.

You must ensure that your work outside APNIC continues to meet these requirements. If there is likely to be a conflict of interest you must obtain written approval from the relevant HR Manager. Approval should be documented by the HR Manager and a copy placed on the employee's Personal History File.

Although you do not need written approval, if you undertake voluntary work or a hobby you also need to ensure that these activities meet the above requirements. If you are unsure, you should discuss this with your manager.

(v) External activities

- You are free to engage in trade union, party-political, professional, interest group or charity activities. You must make sure that your participation in such activities does not cause a conflict of interest, and that it does not restrict the performance of your duties with APNIC.
- You must not use your role in APNIC, APNIC information or information gained in the course of your duties, to advance your position or standing within an external organisation, nor for the benefit or promotion of an external organisation. You must not provide APNIC information to members of other groups or related persons, except where this information is publicly available.

3. Diligence

Standards of conduct

(i) Diligence, care and attention

APNIC aims to conduct its business with integrity, honesty and fairness and to achieve the highest standards in service delivery. You contribute to this aim by carrying out your duties honestly, responsibly, in a conscientious manner and to the best of your ability. This includes:

- giving priority to your work duties over personal activities during work time;
- helping APNIC achieve its mission and goals by acting to improve systems and practices;
- conducting yourself in a way so others gain confidence and trust in the way APNIC does business;
- not allowing your conduct to distract or prevent others from working; and
- not exposing APNIC to a judgment for damages against it, as a result of your negligence or breach of any law or ordinance.

If you are responsible for managing or supervising others, you must also ensure that:

- you model the values and principles outlined in this Code and ensure that employees within your area of responsibility understand and comply with the Code;
- you do not come under a financial obligation to any employee you supervise or manage;
- your work and the work of those you supervise contributes to the achievement of APNIC's goals;
- employee performance is monitored and individuals are given constructive and regular feedback on their performance in line with procedures;
- where practicable, employees are given training opportunities to assist them in developing their careers;
- workloads are fairly distributed;
- resourcing for a work team is neither excessive nor inadequate for the job;
- employees who collect, handle or disburse public money are properly supervised;
- employee work times, overtime, allowances and absences are correctly recorded; and
- appropriate action is taken if breaches of this Code occur.

(ii) Attendance at and absence from duty

You are expected to follow APNIC employment and working arrangements, agreements and rulings on attendance at work and leave. This includes not being absent without approval and accurately and truthfully recording work and leave periods.

Absence without approval and without reasonable excuse can create concerns for your safety and unproductive time for others, and may result in deductions in salary/pay for the period of absence and/or possible disciplinary action.

(iii) Self-development

You should aim to maintain and improve your work performance and that of your work unit in the delivery of member service. You have a continuing responsibility to maintain and enhance your skills and expertise and keep up to date the knowledge associated with your area of work. APNIC will assist you by providing equitable access to training and development opportunities. This may include accessing the study assistance scheme, learning new work duties, participating in project work or undertaking internal or external training.

(iv) Workplace health and safety

We are all committed to Zero Harm in the way we conduct our business and APNIC activities. You must take reasonable steps to ensure your own safety, health and welfare in the workplace. You also have a duty of care to both fellow employees and members of the public.

We must all:

- identify hazards and manage risks to health and safety;
- perform all work safely and follow safe work practices;
- use personal protective equipment if required;
- report any incidents or hazards immediately and support investigations; and
- take corrective action to 'make safe' and implement improvements.

We must keep the workplace drug and alcohol free if we are to maintain the trust and confidence of members and the health and safety of all employees. The use of drugs or alcohol adversely affects productivity, attendance and on-the-job safety.

You must not:

- use, possess or be impaired by the effects of illegal drugs while on duty;
- consume alcohol while on duty or in the workplace unless authorised to do so;
- come to work impaired by the effects of alcohol or drugs; or
- gamble or bet on APNIC premises (except for authorised sweeps and tipping competitions).

Smoking in APNIC buildings, offices or vehicles is not permitted, except where provisions have been made.

4. Economy and Efficiency

Standards of conduct

(i) Using APNIC assets

APNIC's assets include property, plant, equipment, information systems, computing resources, goods, products and valuables (this includes surplus material, waste material and off-cuts). All employees share the responsibility for looking after them.

If you are in charge of assets you must take good care of them while they are in your possession or use and ensure they are used economically and efficiently. It is an offence to misuse or allow anyone else to misuse APNIC assets. You must make sure assets are secured against theft and properly stored, maintained and repaired.

You must ensure that you use APNIC assets only for official APNIC business, unless written approval has been granted by your manager.

You are not to access or disclose any information about members unless you are carrying out official APNIC business.

You must not store personal files on APNIC's IT assets. Any files stored on, or information accessed using APNIC assets, is discoverable by APNIC.

You can use telephones on a reasonable basis for local calls that you cannot make conveniently outside working hours. APNIC mobiles should only be used for approved APNIC business, or in an emergency situation, at the discretion of the manager.

You can have limited personal use of electronic mail and World Wide Web browsing, in accordance with the Acceptable Internet Usage Procedure. Limited personal use means use that is infrequent and brief, and is performed during your non-paid time, that is, before and after work and during lunch breaks. Please see the definitions section for more information.

When you leave APNIC, you must return all APNIC property and work-related documents.

(ii) Intellectual property

You must obtain written approval before arranging to publish or disclose any articles or materials you produced as part of your duties. Any original work, invention or product you contributed to in association with your work remains the property of APNIC.

Similarly, you must not publish or disclose any matters relating to APNIC's intellectual property without appropriate authority.

This does not stop you from sharing with other organisations information relating to your duties. However, if you do, you must make sure you do not breach the confidentiality of APNIC information, its employees or its clients, or compromise APNIC's intellectual property rights.

You must also respect the intellectual property rights of individuals and organisations outside APNIC. For example, you must not copy, quote or reproduce their work unless they have given you permission to do so.

You must not infringe Copyright Law, including the intellectual property, of any individual or organisation. For example, you must not store or copy audio, video or image files, printed media and software without appropriate license or approval on APNIC assets.

Penalties

A breach of the Code of Conduct will damage business and work relationships. Suspected breaches will be treated individually and all relevant circumstances will be taken into account. Suspected breaches and any subsequent disciplinary action will be treated in line with the Counselling, Discipline and Termination Procedure. Depending on the severity of the breach, formal disciplinary action might be taken.

You may be suspended from duty, with or without pay:

- if there is suspected official misconduct or misconduct;
- while an investigation is progressed; or
- while charges are determined by the relevant court.

If you believe that another employee is breaching the APNIC Code of Conduct, you can discuss this with management or Human Resources without risk of reprisal.

Variations

APNIC reserves the right to vary, replace or terminate this Code from time to time.

Policy Version and Revision Information

Policy Authorised by: Business Area Manager

Policy Maintained by: Human Resources Manager

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