



# snowdome™

FOUNDATION

## SNOWDOME LIMITED ATF THE SNOWDOME FOUNDATION

### CODE OF CONDUCT

This Code of Conduct (**Code**) provides a framework for the conduct and behaviour of its executives, employees, directors and volunteers. It underpins the Foundation's commitment to integrity and fair dealing in its affairs and to a duty of care to all volunteers, employees, donors, funding recipients and stakeholders ("the Stakeholders"). The document sets out the principles covering appropriate conduct in a variety of contexts and outlines the minimum standard of behaviour expected from directors, volunteers and employees. This Code may be amended from time to time by the Board and will be made available to all staff, both paid and volunteer.

This Code applies equally to all volunteers, employees, directors and officers of the Company ("Snowdome Limited"), and the Foundation ("The Snowdome Foundation") (collectively referred to as the "**Officers**"), and each Officer is responsible for ensuring their individual compliance with the Code. The Company and the Foundation are herein referred to as the "Snowdome Group" or the "Group".

#### 1. Accountabilities

##### (a) Board

The Board is responsible for

- (i) setting the tone of legal, ethical and moral conduct to ensure that the Snowdome Group are considered reputable by the industry, both in philanthropy and commerce, and other outside entities; and
- (ii) ensuring that all volunteers and employees are aware of the Code.

##### (b) Managers and Supervisors

Managers and supervisors are responsible and accountable for:

- (i) undertaking their duties and behaving in a manner that is consistent with the provisions of the Code;
- (ii) the effective implementation, promotion and support of the Code in their areas of responsibility; and
- (iii) ensuring volunteers and employees under their control understand and follow the provisions outlined in the Code.

*making hope real*

## (c) Employees &amp; Volunteers

All employees and volunteers are responsible for:

- (i) undertaking their duties in a manner that is consistent with the provisions of the Code;
- (ii) reporting suspected inappropriate conduct; and
- (iii) reporting any departure from the Code by themselves or others.

**2. General principles**

All stakeholders are entitled to expect the highest professional standard from the Officers of the Snowdome Group. Compliance with this Code and the Snowdome Group's other policies will contribute positively to the good corporate governance of the Group as a whole.

## (a) Discharge of duties

- Officers must act honestly, in good faith and in the best interests of the Group.
- Officers must discharge their duties at the highest level of honesty and integrity, in good faith and having regard to the position and the organisations goals and objectives of the Group. Officers should not engage in conduct likely to bring discredit upon the Group.
- Officers also have a duty to use due care and diligence in fulfilling the functions of their position and exercising the powers attached to their employment, whether paid or voluntary.
- Officers must recognise that their primary responsibility is to the Group's stakeholders as a whole.
- Officers should not engage in conduct likely to bring discredit upon the Group.

## (b) Personal And Professional Behaviour

When carrying out your duties, you should:

- (i) behave honestly and with integrity and report other Officers who are behaving dishonestly;
- (ii) carry out your work with integrity and to a high standard;
- (iii) operate within the law at all times;
- (iv) follow the policies of the Group; and
- (v) act in an appropriate business-like manner when representing the Group in public forums, consistent with the objectives of the Snowdome Group.

## (c) Compliance with laws

It is essential that all Officers comply with the rule and spirit of all laws and regulations under which the Snowdome Group operates and with the principles of this Code. In addition, they must comply with the ethical and technical requirements of any relevant regulatory or statutory body. Violations of such laws may have serious consequences for the Group and any individuals concerned. Any known violation must be reported immediately to the Chairman of the Audit & Risk Committee.

(d) Conflicts of interest

There may be times when an Officer's personal interests or the interests of any associated person conflict with those of the Group or its Stakeholders. In these circumstances, appropriate action should be taken to remove or manage such conflict.

Potential for conflict of interest arises when it is likely that an Officer could be influenced, or it could be perceived that such Officer is influenced by a personal interest when carrying out their duties. Conflicts of interest that lead to biased decision making may constitute corrupt conduct.

Officers must report any potential or actual conflicts of interest to the appropriate manager. If Officers are uncertain whether a conflict exists, you should discuss that matter with your manager and attempt to resolve any conflicts that may exist.

(e) Confidentiality

During the course of performing their duties Officers may learn information about the Snowdome Group or its Stakeholders. This information is confidential and remains the property of the Snowdome Group.

Confidential information must not be improperly used or given out to other Officers of the Group or third parties and improper advantage must not be taken of an Officer's position.

(f) Use of the Group's resources

The Group's assets are critical to its ability to operate efficiently and successfully. Assets include all office equipment, computer systems and data, and other operating plant of the Snowdome Group.

These assets are provided to Officers to conduct the Snowdome Group business and any other use must be authorised prior to such use.

(g) Equal opportunity

The Company is an equal opportunity employer, both for paid and voluntary positions, and discrimination or harassment of any kind will not be tolerated.

(h) Competition for Funds and Funding Support

The Snowdome Group competes fairly in the markets in which it operates. The Company relies heavily on the continuing support of its Stakeholders and these Stakeholders must not be deliberately misled in any circumstances.

(i) Environment, Health and Safety

The environment in which the Group operates and the health and safety of its Officers is a key concern for Snowdome. The impact of environment and health and safety issues are taken into

account when making key decisions. These decisions must not compromise the Group's responsibility to its Officers, the environment and must at all times comply with local laws.

It is the responsibility of all Officers to act in accordance with occupational health and safety legislation, regulations and policies applicable to activities.

(j) Discrimination And Harassment

Officers must not harass, discriminate, or support others who harass and discriminate against colleagues or members of the public on the grounds of sex, pregnancy, marital status, age, race (including their colour, nationality, descent, ethnic or religious background), physical or intellectual impairment, homosexuality or transgender.

Such harassment or discrimination may constitute an offence under legislation. Managers should understand and apply the principles of Equal Employment Opportunity.

(k) Corrupt Conduct

Corrupt conduct involves the dishonest or partial use of power or position which results in one person/group being advantaged over another. Corruption can take many forms including, but not limited to:

- (i) official misconduct;
- (ii) bribery and blackmail;
- (iii) unauthorised use of confidential information;
- (iv) fraud; and
- (v) theft.

Corrupt conduct will not be tolerated by the Snowdome Group.

(l) Responsibilities To Stakeholders

Snowdome strives for full, fair and accurate disclosure of scientific, financial and other information on a timely basis.

### 3. Directors

The following applies to Directors and aims to ensure that Directors have a clear understanding of the Group's expectations of their conduct.

(a) Fiduciary duties

All directors have a fiduciary relationship with the Stakeholders, in particular the Donors, of the Snowdome Group. A director occupies a unique position of trust, which makes it unlawful for directors to improperly use their position to gain advantage for themselves.

Each director is expected to exercise skills commensurate with their level of knowledge and experience to increase the value of Snowdome for the benefit of Stakeholders as a whole.

(b) Duties of directors

Each director must endeavour to ensure that Snowdome is properly managed so as to protect and enhance the interests of all Stakeholders. To meet this obligation each Director should:

- at all times exercise due care in their duties;
- be diligent, attend Board meetings and make themselves knowledgeable about the business of Snowdome and the physical and social environment in which it operates;
- ensure that Stakeholders are informed;
- avoid or fully disclose conflicts of interest; and
- be impartial in their judgements and actions.

(c) Conflict of interest

A Director must act in the best interests of Snowdome at all times. Where the interests of associates, the personal interest of a Director or a Director's family may conflict with those of the Group, then the Director must immediately disclose such conflict and either:

- eliminate the conflict;
- abstain from participation in any discussion or decision-making process in relation to the subject matter of the conflict; or
- in exceptional circumstances they may need to consider resignation as a director of the Group.

Executive Directors must always be alert to the potential for a conflict of interest between their roles as executive managers and their fiduciary duty as Directors.

#### 4. Stakeholders

The Board recognises that the primary stakeholders in Snowdome are the Donors and recipients of funding. Other legitimate stakeholders include volunteers, employees, regulators, and the general community.

Snowdome primary objective is to accelerate the availability of effective treatments to blood cancer patients in the community. .

The Group is committed to conducting all its operations in a manner which:

- protects the health and safety of all employees, volunteers and community members;
- recognises, values and rewards the individual contribution of each person; and
- is honest, lawful and moral.

All Officers are expected to act with the utmost integrity and objectivity, striving at all times to enhance the reputation and performance of Snowdome.

## 5. Reporting Matters of Concern

Snowdome views breaches of this Code as serious misconduct. If Officers become aware of any breaches of this Code, the matter must be reported immediately to the Chair of the Audit and Risk Committee. The Audit & Risk Committee Chair has the responsibility to report the breach to the Board and to advise the individual of the outcome and actions implemented.

### Policy History

Established:	September 2011
Last review:	27 April 2016
Review frequency:	Annually or as required