

Cambridge Boxhill Language Assessment Pty Ltd (CBLA) Code of Conduct





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Organisation Vision & Mission

Our Vision

To connect the world to better healthcare.

Our Mission

- To improve global healthcare services
- To enhance the lives of patients and healthcare professionals
- To create a sustainable enterprise where all stakeholders enjoy long term success



1. Purpose of CBLA Code of Conduct

The CBLA Code of Conduct (CBLA Code) is one of the elements that connects us together.

The CBLA Code:

- states who we are at CBLA and expectations for how we conduct ourselves in our work;¹
- represents the CBLA organisational culture, mission and vision;
- is a tool to provide guidance during your engagement with CBLA, to understand and uphold CBLA values; and
- helps CBLA Personnel (including directors, officers and employees) and CBLA third party suppliers and vendors (“Business Partners”) to navigate what to do when a situation is complex or during an ethical dilemma, by providing standards and values for you to follow, to protect against situations that may result in damage you or CBLA. It also seeks to ensure that CBLA Personnel and Business Partners avoid using possible unequal power relationships for their own benefit.

Compliance with the CBLA Code is mandatory and a condition of employment for CBLA Personnel or engagement with CBLA.

The CBLA Code provides a framework within which all CBLA Personnel and Business Partners, regardless of location, undertake to discharge their duties and describes the standards of behaviour we set ourselves and each other.

At CBLA our mission is:

- To improve global healthcare services.
- To enhance the lives of patients and healthcare professionals.
- To create a sustainable enterprise where all stakeholders enjoy long term success.

When we follow the CBLA Code we’re contributing to better outcomes for our organisation, customers and communities enabling quality of performance and reputation.

The CBLA Code describes what CBLA expects from its CBLA Personnel and Business Partners and what they can expect from CBLA.

¹ CBLA includes the CBLA Group (CBLA Pty Ltd (in its capacity as trustee of the CBLA Unit Trust), OET USA LLC and OET Global Pty Ltd).



2. Scope

The CBLA Code:

- applies to the CBLA Group as defined in section 1 and CBLA Personnel and Business Partners; and
- adheres to international human rights law.

When read in conjunction with the CBLA values, the CBLA Code is designed to support our strategy, set expectations for how we work together, provide guidance on decision making when navigating tough situations and supplements our legal, fiduciary and contractual obligations in areas such as: Occupational Health and Safety, Equal Opportunity, Discrimination, Data Governance & Privacy and Corporate Governance.

3. The CBLA Code and the Law

CBLA Personnel and Business Partners are required to adhere to the CBLA Code (as applicable) and applicable laws, rules and regulations.

In circumstances where a provision of the CBLA Code conflicts with applicable laws, the law is paramount.

If at any time you are uncertain what laws apply to you, or if you believe there may be a conflict between different applicable laws, you should consult your People Leader or a member of the People and Governance Team.

CBLA Personnel are encouraged to speak up if something isn't right, use your judgment and speak up honestly and constructively about your concerns and have an ongoing duty of disclosure.

Every concern matters. Please refer to the Whistleblower Policy for more information on how to raise something anonymously if you wish.



4. Our Values

CBLA values describe how we work. CBLA's core values:



Excellence, always



Communicate openly



Inspired to innovate



I am because you are



One team, one mission

5. Code of Conduct Commitment

CBLA Personnel and Business Partners are required to:

5.1 Uphold the integrity and reputation of CBLA by ensuring that professional and personal conduct is demonstrably consistent with CBLA's values and standards.

CBLA Personnel and Business Partners must:

- Seek to maintain and enhance public confidence in CBLA by being accountable for their professional and personal actions.
- Observe the requirements of the CBLA Code and be sensitive to, and respectful of, local customs and culture, even if the norms and values in that cultural context differ from the CBLA Code.
- Seek (and receive) support and advice from CBLA. (such as; People Leader, Executive or member of People and Governance).
- Act responsibly and not be under the influence of alcohol or drugs, or use alcohol or illegal drugs while at work.

5.2 Treat all people with respect and dignity and challenge any form of harassment, discrimination, intimidation, exploitation or abuse.

CBLA Personnel and Business Partners will respect all peoples' rights, and will contribute to a working environment characterised by mutual respect, integrity, dignity and without discrimination. Everyone should feel safe at work and health, safety and wellbeing is promoted at CBLA.

5.3 Be responsible for the use of information, equipment, money and resources related to employment or contractual engagement with CBLA.

CBLA Personnel will seek authorisation before communicating externally in CBLA's name. CBLA Personnel and Business Partners will use discretion when handling sensitive or confidential information in accordance with relevant CBLA IT Policies. The CBLA IT Policy can be found [here](#).

5.4 Protect the health, safety, and wellbeing of all CBLA Personnel, Business Partners and any other stakeholders.

CBLA is committed to the provision of a safe and healthy working environment and complying with all relevant health and safety legislation to the highest possible standard. Our Health, Safety and Wellbeing Policy can be found [here](#).

5.5 Personnel Integrity and Conflict of Interest

A conflict of interest occurs when a person's personal interest conflicts with their responsibility to act in the best interests of CBLA. Apparent or perceived conflicts of interest may be as important as real conflicts.

CBLA Personnel and Business Partners should not unduly use their position at or relationship with, CBLA for personal gain that is inconsistent with work-related duties, or to benefit relatives or close associates.

CBLA Personnel must not undertake any other appointment, position or work during their employment with CBLA without the prior written consent of CBLA.

CBLA Personnel and Business Partners should declare any conflicts or perceived personal conflict of interest.

A conflict of interest that is deliberately concealed may result in disciplinary action (CBLA Personnel) or termination of the relationship with a Business Partner.

6. Responsible Conduct

CBLA Personnel and Business Partners must adhere to the CBLA Code of Conduct.

If ever in doubt about a course of conduct, ask yourself:

- Is it consistent with the CBLA Code?
- Is it ethical?
- Is it legal?
- Will it reflect well on me and CBLA?
- Is it your decision to make?
- Would I want to see a story about this on social media?

If the answer is “no” to any of these questions, do not do it and seek advice.

If you are still uncertain, ask for guidance from your People Manager or People and Governance.



7. Business Integrity

All CBLA Personnel contribute to CBLA's integrity as a company on a worldwide basis; misconduct in one country may have negative implications for CBLA globally.

Integrity is also integral to all contractual arrangements with CBLA's Business Partners whose personnel are expected to:

- Adhere to all applicable laws and regulations as well as to the high integrity standards required by CBLA.
- Assess carefully, on a case-by-case basis, whether their business conduct complies with CBLA's expectations and standards of business integrity.

7.1 Bribery & Improper Advantages

CBLA has zero tolerance for bribery or any other form of corrupt business conduct.

CBLA rejects all forms of corrupt business conduct, such as bribery (public, private, active and passive), embezzlement, fraud, theft and the granting of improper advantages.

Bribery

CBLA Personnel and Business Partners are all expected to follow these basic principles:

- do not offer, promise or give a bribe to seek financial or other advantage for CBLA;
- do not request, agree to receive, or accept a bribe from any person or organisation, for any purpose; and
- do not require, assist, or encourage any third party or anyone else to make such payments on your behalf.

Bribery, corruption, and fraud by Personnel will be treated as a serious disciplinary offence which may result in dismissal and legal action.

A link to the Anti-bribery & Corruption Policy can be found [here](#).

7.2 Accurate Reporting

Data integrity is key to our business.

We ensure that any data, information or records which we create, or for which we are responsible, are true and fair. These can take many forms, ranging from Finance

Reports, research and development data, to our personal travel and expense claims or even our emails.

CBLA Personnel must adhere to applicable laws, internal accounting and reporting guidelines and external financial and non-financial reporting standards and ensure that any information supplied to stakeholders, such as auditors, regulatory agencies and government bodies is accurate.

Falsifying records and accounts or misrepresenting facts may constitute fraud. CBLA Personnel who engage in such illegal conduct may be subject to severe penalties.

CBLA Personnel must not make a false or misleading statement or entry in any report, publication record or expense claim.

CBLA Personnel are expected to:

- make sure information we create or report is true, fair and complete; and
- never misrepresent facts in any CBLA report, publication, record or other document.

7.3 Complying with the Law

CBLA has zero tolerance for material non-compliance with the law.

CBLA strives to remain a fair and respected taxpayer in the countries where we operate. A link to the Tax Policy can be found [here](#).

7.4 Quality Standards & Good Practices

Maintaining high-quality standards is essential for our business. Quality is everyone's responsibility. Quality is ingrained in everything we do, from concept through to continuous improvement. CBLA is committed to complying with legal and regulatory requirements, internationally acknowledged good practices and to meeting the high expectations of its stakeholders regarding the quality and efficacy of its products and services. CBLA has established a quality system including policies and procedures that CBLA Personnel and Business Partners must follow. In addition, CBLA Personnel must report any deviations from our policies to their People Manager or the People and Governance Team.

CBLA expects that its Business Partners also adhere to CBLA's policies and procedures that apply to Business Partners.

8. Data Privacy

The right to privacy is a fundamental human right.

The protection and responsible use of personal data is reflected in our daily operations at CBLA. Privacy by Design is being implemented within CBLA and is about using and handling personal information through the lens of best practice. Embedding privacy as a default consideration throughout our information systems, projects, processes, products and services is part of our holistic approach.

We use and process personal data with due care, and adhere at all times with applicable privacy laws.

We are committed to collecting and using data in a lawful, fair, legitimate and ethical way, and will always respect the privacy of individuals in order to earn and deserve their trust.

CBLA assumes accountability for the compliant processing of personal data by itself or by its trusted service and cooperation partners.

Any information related to an identified or identifiable person must be collected and processed in compliance with applicable data privacy laws. The CBLA Privacy Policy can be found [here](#).

We are all expected to:

- Collect, use and store data in compliance with applicable laws in any country in which we operate, the principles of Privacy by Design and CBLA's Privacy Policy.
- Respect an individual's right to privacy at all times.
- Never re-identify or attempt to re-identify anonymised data.
- Carefully select the third parties we're trusting to process or access personal data which we are responsible for, and ensure that appropriate due diligence is completed.

9. Employment at CBLA

9.1 Discrimination & Harassment

We value diversity and inclusion as part of an inspiring working environment.

Diversity requires careful leadership to avoid misunderstandings and conflicts, and to exploit the full value of diversity.

At CBLA we value and manage diversity through an inclusive environment.

CBLA is committed to fair and equal treatment of all CBLA Personnel and all people who seek employment at CBLA, including equal opportunity for development and advancement. We have zero tolerance for any form of discrimination or harassment in the workplace.

We have zero tolerance of CBLA Personnel or our Business Partners being subjected to offensive, abusive or other unwanted conduct which violates the personal dignity of the victim or creates an intimidating, hostile or humiliating environment for the victim.

CBLA is committed to providing a workplace that is free from all forms of unlawful discrimination, harassment, victimization and bullying. CBLA's Workplace Behaviour Policy can be found [here](#) and Grievance Policy [here](#).

9.2 Safety, Security, Health and Environment

CBLA promotes and provides safe, secure and healthy workplaces and a clean environment.

CBLA's operations are conducted in compliance with applicable health, security, safety and environmental laws and regulations, company standards and best practices.

CBLA strives for continuous improvement wherever possible and economically viable. We proactively seek to employ new, more sustainable technologies and processes to minimise our impact on people and the environment. We continuously develop our products and services for improved sustainability.

All CBLA Personnel are responsible for safety, security, health and environmental protection at the workplace to the best of their knowledge, ability and experience. We expect the same standards and commitment from our Business Partners.

CBLA Personnel are expected to:

- Ensure safety and security and protect health and the environment at our workplace to the best of our knowledge, ability and experience.
- Integrate considerations regarding safety, security, health and environment into our daily work.
- Stop our work when it is not safe.

9.3 CBLA Confidentiality

CBLA Personnel are expected to respect personal privacy and confidentiality.

CBLA confidential information requires special treatment and protection.

Internal or external stakeholders who provide confidential information to CBLA have the right to expect this information will be treated as confidential.

CBLA Personnel with access to confidential information must ensure it remains confidential, and at all times act in accordance with CBLA policies and procedures.

“Confidential Information” includes, but is not limited to, the following:

- personal information as defined in applicable privacy laws including the Privacy Act 1988 (Cth);
- trade secrets of the CBLA Group;

- information about the business and affairs of the CBLA Group;
- information about customers of the CBLA Group;
- customer names and addresses, customer lists, business cards and diaries, calendars or schedules;
- computer databases and computer software; and
- all other information obtained from the CBLA Group or obtained in the course of your employment with CBLA, that is by its nature confidential.

CBLA Personnel must not, at any time during or after the termination of their employment for any reason, directly or indirectly disclose or use (or attempt to disclose or use) any confidential information which is inconsistent with their CBLA duties or express terms of engagement.

9.4 External Communication & Public Comment

All media or public comment enquiries are to be referred directly to the Customer and Marketing Team at applications@oet.com.au.

CBLA Personnel may only make public comment (whether on social media, or other publication) when specifically authorised to do so in performance of their CBLA duties. Such comment is restricted to factual information and should avoid the expression of personal or political opinion.

Public comment includes speaking engagements and providing information or comment through any media, including social media. When making a comment in a private capacity, CBLA Personnel must make it clear they are expressing their own view. CBLA Personnel must also ensure that personal comments do not compromise their or others' capacity to perform in an unbiased manner, and that their comments are not seen or perceived to be an official comment.



10. Breach of the Code of Conduct

CBLA treats breaches of this Code seriously.

All CBLA Personnel and Business Partners have a responsibility to act consistently with this Code. When the CBLA Code is followed we're contributing to better outcomes for our organisation, customers

and communities. Consequences for not following the CBLA Code range from coaching and counselling so we can learn from our mistakes through to termination of employment or engagement ending for serious breaches, and in some cases legal action.

11. Raising Concerns

If you have a serious concern regarding any aspect of your work, the conduct of others or our organisation's operations, you should report your concerns in accordance with the CBLA Workplace Grievance Policy or the Whistleblower Policy. This will allow CBLA to deal with the issue and correct it, ideally before it becomes a violation of law or a risk to health, security or CBLA's reputation. CBLA's Whistleblower Policy can be found [here](#) and Grievance Policy [here](#).

Your People Manager is usually the first point of contact for reporting concerns, however, there may be occasions when speaking to your People Manager may not be appropriate. In these instances, you may raise your concerns in confidence (or anonymously) with a member of the People and Governance Team.

CBLA takes all reports of possible misconduct seriously.

We will investigate the matter confidentially, make a determination about whether the Code or the law has been broken, and take appropriate corrective action.

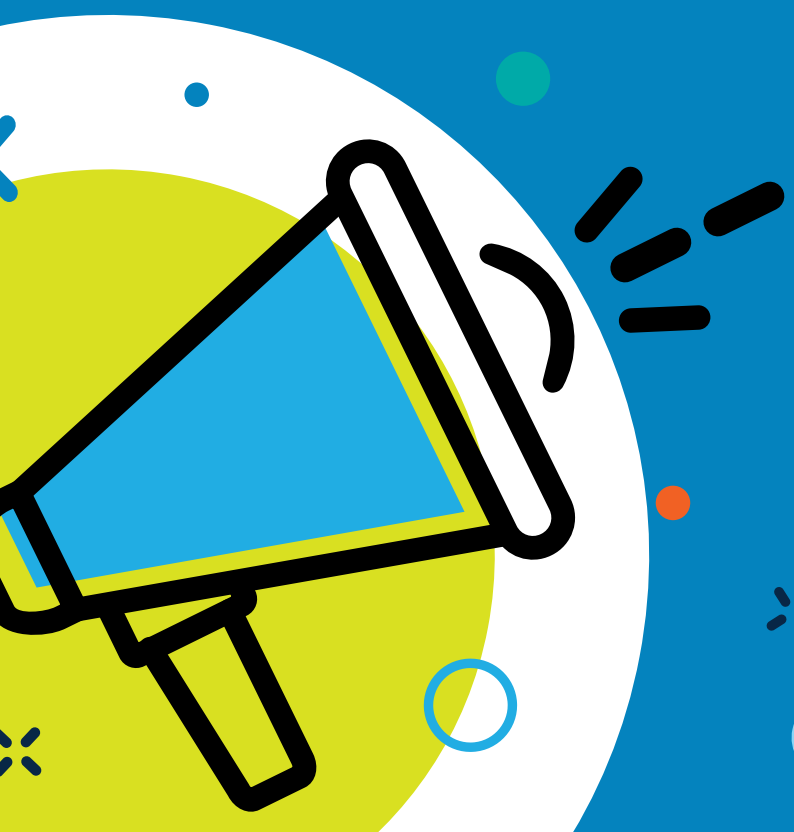
Making False Accusations

It is a breach of the CBLA Code to knowingly make a false accusation, lie to investigators, or interfere or refuse to cooperate with an investigation.

11.1 Ethical Conduct & Company Culture

CBLA has a robust corporate culture which encourages 'self-correcting' conduct.

CBLA Board and Management are responsible for overseeing the development and implementation of systems and processes which facilitate CBLA's ethical culture.



12. Definitions

TERMS	DEFINITIONS
Bribe	An advantage or benefit of value (which need not be cash) offered, promised, or given to someone in order to obtain a commercial advantage, or to induce the recipient to, or reward the recipient for acting improperly or where it would be improper for the recipient to accept the benefit. Bribes can take many forms, including facilitation payments which are payments given to an official to encourage the performance or speed up the performance of an existing duty.
Corruption	The misuse of entrusted power for private gain.

TERMS	DEFINITIONS
CBLA Personnel	All directors, staff and employees of the CBLA Group, and all persons performing work at the direction of, in connection with, or on behalf of CBLA (for example stakeholders, agency on-hire staff, contractors, subcontractors, agents, consultants, and temporary staff).
Executive	Team typically made up of the CEO's direct reports.
Fraud	The use of deception or intentional misrepresentation to obtain an unjust or illegal financial advantage or deprive CBLA of any value or property.
Conflict of Interest	A conflict of interest is a situation in which a person or organisation is involved in multiple interests, financial or otherwise, and serving one interest could involve working against another.

13. Code of Conduct Agreement

All CBLA Personnel are bound by this Code of Conduct.

By engaging with CBLA, Business Partners agree to be bound by this Code of Conduct





Cambridge Boxhill Language Assessment Pty Ltd (CBLA) Code of Conduct

Owner: CEO
Authors: People and Governance
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