

RESIDENT CODE OF CONDUCT POLICY

Aura Holdings is committed to providing caring, friendly, safe and secure home-style communities.

Our goal is to:

- develop communities of architecturally designed accommodation and facilities that are purpose-built to the special needs of the retirees;
- implement systems that ensure compliance with Federal, State and local legislation relating to the ownership and management of a village;
- continue to develop a dynamic organisation through attaining best practices in its operations and the delivery of its products and services;
- provide residents and their family or representatives with methods for expressing a complaint about any aspect of our service, with the knowledge they can do so free of retribution; and
- respect the rights, freedoms and dignity of residents.

Values and principles underpinning this Code of Conduct

It is the intention to foster, at all times throughout the village, a climate conducive to appropriate self-discipline in every resident. The Company has a duty of care, therefore the Company expects the following to be incorporated into the decisions, actions and behaviour of all residents;

- courtesy and respect for individuals;
- cultural sensitivity;
- ethical behaviour;
- fairness and impartiality; and
- transparency openness, honesty and accountability.

Discrimination, harassment, bullying and violence

Aura Holdings values a village environment that is free of verbal or physical harassment and all forms of discrimination. The support of residents is sought to identify and rectify practices, attitudes and traditions that lead to discrimination. Aura Holdings has an ongoing commitment to ensure there is no discrimination in the village in line with State and Federal legislation.

Reporting discrimination, harassment of bullying

Aura Holdings has a grievance procedure in place, with experienced staff appointed to manage formal or informal resolution of grievances. Everyone is encouraged to use these policies and procedures if they consider that they are experiencing discrimination, harassment of bullying.

Responsibilities

The Village Manager has the responsibility to:

- ensure, to the extent of their authority, that the village is free from all forms of bullying, harassment and unlawful discrimination by monitoring the village environment to ensure that acceptable standards of conduct are observed at all times;
- promote this policy and the relevant grievance procedures within their area of responsibility; and
- treat all complaints seriously and confidentially and take immediate action in line with the relevant policy and procedures.

All residents have the responsibility to:

- comply with this policy;
- offer support to anyone who claims that they are experiencing discrimination, harassment or bullying and let them know where they can get help and advice; and
- consult with the Village Manager on all reports of discrimination, harassment and bullying.

When disciplinary measures need to be taken, the actions will be directed toward two governing aims:

- to inform or remind residents about acceptable standards of conduct; and
- to prevent undisciplined behaviour from adversely affecting the well-being of the village.

It is in the interests of all parties to manage the resolution of any conflict by means that do not disrupt the operations of the village. It is preferable that a grievance is resolved at the point of the grievance, that is, the resident concerned discuss the matter with the Village Manager and both agree on a resolution. If the matter is unresolved, the grievance will be taken to the Manager Operations and Partnerships and/or the Chief Executive Officer, who will investigate the matter in line with the Company Policy and Procedures.

All reports will be treated seriously, confidentially and investigated thoroughly.

Strategies

Aura Holdings will implement strategies to eliminate discrimination, harassment and bullying. These include:

- awareness-training strategies to ensure that all residents are aware of this policy;
- grievance management procedures which are based on the principles of procedural fairness; and
- treating all grievances in a sensitive, fair, timely, impartial and confidential manner.

Definitions

Bullying – repeated, unreasonable and inappropriate behaviour in the workplace which comprises behaviour that intimidates, offends, degrades, insults or humiliates a resident or staff member. This can be physical or psychological behaviour.

Discrimination – Unlawful discrimination can occur when someone, or a group of people, is treated less favourably than another person or group because of a specified attribute such

as their race, colour, national or ethnic origin, pregnancy, breastfeeding; relationship status, carer status, age, transsexuality, disability, sexuality, union affiliation, religious or political conviction or any other characteristic specified.

Harassment – Unlawful harassment can occur when someone is made to feel intimidated, insulted or humiliated because of their race, colour, national or ethnic origin, sex including sexual harassment, disability, sexuality, or any characteristic specified under human rights legislation. It can also occur if someone is working in a “hostile”, or intimidating, environment. The behaviours can be overt or subtle, verbal, non-verbal or physical.

Sexual harassment – any unwanted, unwelcome or uninvited behaviour or a sexual nature that makes a person feel humiliated, intimidated or offended. It can involve physical contact, verbal remarks or non-verbal contact of a sexual nature.

Victimisation – any unfair treatment of a resident or staff member, including threats or intimidation, and causing detriment when a staff member has acted within the Complaints and Grievance Policy or because they have supported someone else who acted within the Complaints and Grievance Policy. This may include such things as adverse changes to a work environment, denial of access to resources, work opportunities or training or ostracism.

Vilification – any public act that incites hatred toward, serious contempt for, or severe ridicule of a person or group of persons on the grounds of race, transsexuality, sexuality and / or medical status. Vilification is considered within the harassment requirements of this policy. Vilification does not include, for example, legitimate debate about issues that might include discussions of race, transsexuality, sexuality and /or medical status.

Violence – defined as any incident in which an individual is abused, threatened or assaulted and includes verbal, physical or psychological abuse, threats or other intimidating behaviours, intentional physical attacks, aggravated assault, threats with an offensive weapon, sexual harassment and sexual assault.