

Code of Conduct

Message from the Chief Executive

The Board, in recognition of the importance of ethical and responsible decision-making has adopted a Code of Conduct for all employees and directors of InvoCare. This code outlines the standards of ethical behaviour essential to maintain the trust of all stakeholders and the wider community.

The Code requires:

- high standards of personal integrity, objectivity and honesty in all dealings;
- respect for the privacy of customers and others; and
- compliance with the law and InvoCare policies.

This Code is provided to all directors and employees as part of their induction process.

The Code is subject to ongoing review and assessment to ensure it continues to be relevant to contemporary conditions and is available on the Company's website.

All directors, executive officers and employees are responsible for taking appropriate remedial action in proven cases where behaviour in the workplace is outside the spirit of this Code.

InvoCare recognises that its clients may be vulnerable due to a recent bereavement and it requires all employees to be aware of their ethical and legal responsibilities. Accordingly, InvoCare requires all employees to behave according to this Code, to maintain its reputation as a good corporate citizen.

Usually, serious concerns are managed locally by operational management but as our business has grown this sometimes does not provide the best avenue to resolve these concerns. All employees are encouraged to contact the Human Resources team, the Internal Audit Manager or me personally on (02) 9978 5201 should issues occur that you do not believe are being appropriately addressed. I can assure you that absolute confidentiality of the source of the information will be maintained if you wish.

It is important you read this information carefully and use it to support your daily business activities. This is so we can maintain a safe, honest and fair workplace providing the highest level of care and support to our client families at their time of need.



Andrew Smith

Chief Executive Officer

Conducting Business

InvoCare is committed to maintaining its reputation for dealing with clients with integrity and honesty. The Company will take serious action against any employee found to have deliberately breached consumer protection laws or acted in an unconscionable manner. Absolute honesty, without the use of aggressive means or harassment, is a must for all dealings with client families.

InvoCare employees must never put themselves in a position where they have, or could be perceived to have, a conflict of interest. Conflicts of interest are avoided by having no involvement, either directly or indirectly, with any business that is a supplier to or competitor of InvoCare. Employees must not seek or accept gifts, payments or other benefits except where these are freely offered and are of nominal value. It is vital that InvoCare employees do not sell, speculate in or otherwise deal with any property of the Company.

Information concerning InvoCare's clients, suppliers and employees is confidential and must never be released without appropriate authorisation. All employees are expected to understand and fully comply with all the obligations imposed by the *Privacy Act 1988*. All confidential information must be stored securely by using appropriate storage facilities, ensuring that password confidentiality is maintained and never leaving confidential information where inappropriate access is possible.

All employees are legally obliged to maintain this confidentiality even after they cease employment with InvoCare.

Insider trading (that is, dealing in InvoCare shares when in possession of non-public price sensitive information) can result in substantial penalties including imprisonment. All employees must adhere to the InvoCare share trading policy and if there is any doubt refer the issue to the Company Secretary.

Inappropriate communication with the media can substantially damage InvoCare's reputation and all public comment must have the prior approval of the executive team or Communications Manager.

InvoCare is committed to providing a safe working environment for all employees. Consequently, all employees are expected to fully understand and comply with all occupational health and safety policies and procedures. The Company is an equal opportunity employer and will not tolerate discrimination or harassment of any type for any reason including on the basis of gender, ethnicity, religious or political beliefs.

The use of prescribed drugs and medicines, alcohol or illegal substances may impair an employee's capacity to perform safely, efficiently and with respect for work colleagues, clients and InvoCare's property and reputation. Accordingly, employees must not attend work if impaired by alcohol or other drugs. When work performance or occupational health and safety may be affected, employees are encouraged to report to a manager or supervisor if they are taking medically prescribed or over the counter drugs, or have concerns about suspected alcohol or drug use by another employee. It is acknowledged that alcohol consumption may occur at times, for example at InvoCare functions or community events. This Code demands a responsible approach to alcohol consumption for the protection of employees, other community members, InvoCare's property and reputation, and for compliance with applicable law. The possession, use or distribution of illegal drugs at or away from work is not tolerated and will result in disciplinary procedures, including warnings or dismissal, and reporting to relevant authorities (eg. police). Employees having a drug or

alcohol problem are encouraged and supported in seeking professional assistance and treatment.

Employees must not steal or misuse InvoCare's property or resources in anyway. Misuse includes the unauthorised or inappropriate use (for example, for private purposes) of InvoCare provided facilities, such as telephones, motor vehicles and computers. IT resources are provided to enhance the efficiency of our operations and must only be used in accordance with existing guidelines. The use or possession of offensive material, including sexually explicit items, will attract the severest penalties.

In order to assist all employees with their obligations under this Code a series of operational policies and procedures have been developed and communicated. The topics covered and the policy references follow.

Failure to comply with the spirit and intent of this code will be severely dealt with and may include termination of employment and in the most serious cases the involvement of the police.



<u>Topic</u>	<u>Policy(ies) / Code</u>
Business integrity / code of conduct	ACCA Code of Ethics AFDA Code of Ethics 5.01 Compliance Manual Consumer Protection 3.06C Customer Complaints – Cem / Crem 3.06F Customer Complaints - Funerals
Reporting improper conduct	Bi-annual management representation questionnaire
Employee relations and discrimination	4.50 Employee Assistance Programme 4.73 Discrimination 4.74 Grievance Policy
Occupational health and safety	7.00 Occupational Health & Safety Policy 7.02 Infection Control 7.03 Manual Handling Policy
Responsibility for the environment	Corporate Social Responsibility Policy
Competition policy	4.72 Conflicts of Interest
Conflicts of interest	4.72 Conflicts of Interest
Relationships with suppliers	Staff Handbook
Financial inducements	
Political contributions	Corporate Social Responsibility Policy
Use of confidential information	4.72 Confidentiality
Use of personal information and privacy	3.18 Privacy Act

Insider share trading

Communications with the media

Responsible use of information systems / technology

Use of company resources

Protection and use of company property

Drugs, alcohol and substance abuse

Conduct after leaving InvoCare

Share Trading Policy

3.12 Media Enquiries and Visits

3.07 Emails and Internet Use

3.14 Motor Vehicle Policy

4.42 Return of Property Form

4.51 Alcohol and Drug Use Policy, Staff Handbook

4.52 Smoking

Staff Handbook (Confidentiality after Ceasing Employment)

Dealing with a Concern

If you believe a matter is of concern first ask yourself these questions:

- Is it legal or ethical?
- Is it consistent with InvoCare's policies, procedures and beliefs?
- Am I comfortable explaining it to friends and family?
- Would I feel comfortable discussing the matter in a public forum?

If the answer to any of these questions is "no", do not turn a blind eye - act! If possible, first discuss the issue with your direct supervisor/manager. If the matter involves your supervisor/manager seek a discussion with his or her supervisor/manager.

In the event these avenues are inappropriate contact the Internal Audit Manager, Human Resources team or the Chief Executive Officer. If you wish, these individuals will maintain the strictest confidentiality over the concerns you raise. InvoCare will seek to protect any employee who raises a genuine concern. Raising issues for malicious or vindictive reasons will not be tolerated.

Remember, InvoCare prides itself on the manner in which we conduct our business and it is the responsibility of each of every employee to ensure we maintain the integrity of our great business and its brands.

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