

THE BELGRAVIA **Code of** **Conduct**





ABOUT THE CODE

Purpose

Team members of the Belgravia Group “Belgravia” are part of a great Australian company that operates with absolute passion. This code of conduct “the Code” has been developed to provide guidance on the type of conduct and standards of behaviour that is expected by the Belgravia Group and its controlled entities “The Company”.

The Code is designed to assist in understanding what standard of behaviours are acceptable and unacceptable in the workplace and what legal responsibilities apply to all team members and business activities.

The Code is not a complete rulebook that addresses every ethical issue that may arise and it is not a summary of all laws and policies that apply to the company. It does not replace good judgement, but rather gives guidance and directs us to resources that help us make the right decisions.

Scope

WHO THE CODE APPLIES TO

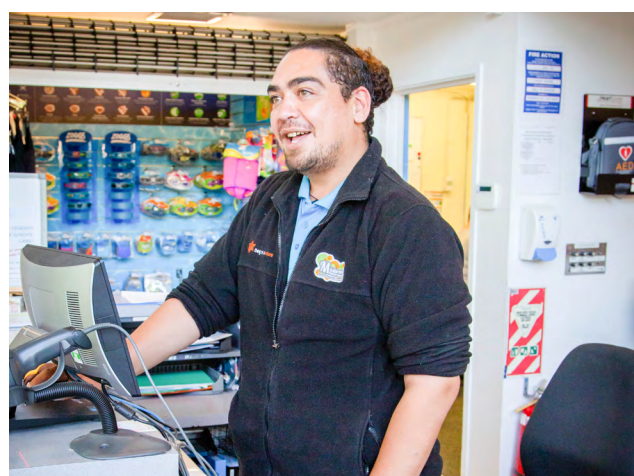
The code extends to those people set out below collectively referred to as **“employee”** or **“Team Member”**.

- The directors of the company, including the Chairman and Chief Executive Officers;
- any other employee or Officer of the company; or
- Any contractor, volunteer, or consultant to the Company whose terms of engagement incorporate this Code.

WHEN THE CODE APPLIES

The Code and expected behaviours apply both in and beyond the usual place of work. This includes, but is not limited to the following circumstances:

- attending and/or representing the Company at work-related functions or events,
- attendance at third party related meetings, functions and events,
- working remotely and
- during business related travel.



WHAT YOU CAN EXPECT from Belgravia

DIVERSITY AND INCLUSION

Our aim is to make Belgravia a place where everyone feels valued for their unique contribution. What others may see as differences; we see as opportunities to bring different perspectives to our everyday business challenges.

HEALTH, SAFETY AND WELLBEING

We care about the health, safety and wellbeing of all the people we work with. We have comprehensive safety policies and resources that promote a safe workplace that all team members should become familiar with.

A CHILD SAFE ORGANISATION

All children and young people who visit our venues have a right to feel and be safe. Our child safety framework and policies embed this commitment into the culture the Company. We have a zero-tolerance approach to child abuse. We aim to create an environment where children and young people feel safe, included and have fun. Please refer to our Child Safety & Wellbeing Policy for more information.

PROTECTING THE PEOPLE WE WORK WITH

Belgravia does not tolerate inappropriate workplace behaviour which includes harassment, discrimination or bullying. Nor do we accept behaviours that risk the safety of team members, customers, suppliers, volunteers, contractors or anyone we interact with. This includes physical and psychological violence or harm. Refer to our Equal Opportunity, Diversity, Anti-Discrimination, Harassment and Bullying Policy and speak with your line manager or contact the People & Culture team if you have any questions.

PRIVACY

We aim to safeguard the privacy of individuals and the personal information provided by team members, customers, suppliers, volunteers, contractors or any one we interact with. We will not accept the use or disclosure of information for anything other than valid business requirements by relevant parties. Refer to our Privacy Policy and speak with your line manager if you have questions.

OBEY THE LAW

We will operate in accordance with all relevant laws and will comply with of our legal and regulatory obligations.



WHAT WE EXPECT FROM our team members

As a representative of the company we expect team members to:

- Treat everyone with whom you interact with dignity, courtesy and respect
- Perform your role to the best of your abilities and always in accordance with the company's values
- Be accountable for your own action and decisions
- Make truthful statements, promises or commitments that the company is able to meet
- Learn about and follow all Company policies and procedures and all relevant laws that apply to your role. Follow any changes to these policies, procedures and laws
- Advise your manager of any situations where you think there could be a breach of the Code and encourage others to do the same
- Protect the reputation of the Company and not make any disparaging or untruthful remarks about the Company, other team members, customers, volunteers, contractors, suppliers or anyone else we interact with
- Behave in a way which ensures your safety and the safety of others. Think safe, act safe and be safe

- Deal fairly and honestly with customers, volunteers, contractors, suppliers or anyone else we interact with.
- Maintain the confidentiality of the Company, its information, publications and intellectual property
- Take reasonable steps to avoid a conflict of interest
- Respect and safeguard the property of the Company including cash, credit cards, equipment
- Obey the law
- Comply with reasonable and lawful directions given by the Company

These expectations apply to all work and work-related social situations and any online or social media content where your connection to the Company could be known.

Examples of unacceptable conduct include, but is not limited to:

- Possessing, consuming or being under the influence of alcohol (unauthorised consumption) or illegal drugs during work hours.
- Being intoxicated or under the influence of illegal drugs at work-related events. You can refer to the Company's Drug & Alcohol Policy for more information.
- Using objectionable or obscene language, gestures, threatening behaviour, intimidation or any form of physical violence to anyone.
- Behaving in a fraudulent and dishonest manner.
- Breaching laws that govern the country and Company in which the team member works.
- Falsifying Company documents or records.
- Making unauthorised statements or providing unauthorised information to the media or others outside the Company.
- Using devices to overhear, record, monitor or obtain private information or communications without the consent of people involved.

- Inappropriate use of Company information, systems or assets.
- Posting of inappropriate false or malicious comments or materials regarding the Company, customers, team members, volunteers, contractors or anyone we interact with.
- Coercing other team members to behave in a manner which may breach the Code or willingly turning a blind eye to there people breaching this Code.

Getting Advice on expected behaviours

If you are unsure of what is expected of you in a particular situation, your manager is your most direct source of information. You should escalate to your manager's leader or the People & Culture team if your direct manager is unable to assist you.





WHAT WE EXPECT FROM our leaders

In addition to their responsibilities as a team member, anyone in a leadership role is expected to:

- Provide and promote a safe and inclusive working environment.
- Lead by example and challenge others to do the same.
- Help team members understand what is expected of them in their roles.
- Build team member's knowledge of the Company values, policies, procedures and all relevant laws that affect their role including where there are changes to policies, procedures and the law.
- Give feedback and coaching to team members to help them perform to the best of their abilities.
- Promptly manage behaviour that is inconsistent with these requirements.
- Listen openly to ideas and suggestion of others.
- Provide an environment where team members can raise their concerns and discuss them openly without fearing or experiencing negative consequences.

CODE OF PROFESSIONAL CONDUCT WITH CHILDREN AND YOUNG PEOPLE

The company expects that all employees, which includes any person in paid or unpaid work on its behalf, will conduct themselves professionally in their dealings with children and young people.

Good practice includes valuing and respecting children as individuals, and the adult modelling of appropriate conduct – which will always exclude bullying, shouting, racism, sectarianism or sexism.

Professional conduct should be demonstrated in the following ways:

- Treat everyone with respect and honesty, including staff, volunteers, students, children, young people and parents.
- Set clear boundaries with regard to appropriate behaviour. Be extremely conscious of physical contact, to avoid it wherever possible, using appropriate contact when required during coaching/instruction.
- Never do things of a personal nature that a child can do for themselves such as changing clothes.
- Always have another adult present or in sight when conducting one to one coaching or instruction.
- Always follow Company policies and guidelines for the safety of children.
- Do not develop any 'special' relationships with children, or take children alone in a car on journeys, however short.
- Always act as positive role models, and never make suggestive or inappropriate remarks to or about a child, even in fun, as this could be misinterpreted.
- Never deter children from making a 'disclosure' of harm through fear of not being believed. If, after listening to a child this gives rise to a child protection concern, employees will follow the Company's procedure for reporting such concerns, and not to attempt to investigate the concern.
- Do not allow personal preconceptions about people to prevent appropriate action taking place, remembering that those who abuse children can be of any age (even other children), gender, ethnic background or socio-economic background.
- Identify and mitigate risks in online and physical environments.
- Do not have unauthorised contact with children and young people online, on social media or by phone, and do not exchange personal contact details such as phone numbers, social networking details or email addresses with children.

Please refer to our Code of Professional Conduct Policy

To learn more about acceptable behaviours and standards for interaction with children and young people.





FAIR TRADING AND MODERN SLAVERY

The principles of fair trading underpin our approach with our customers, suppliers and partners. We do our very best to be open, honest, ethical and trustworthy in our dealings.

We are committed to acting ethically and with integrity in our business relationships. This includes taking steps to ensure that there is no slavery, servitude, forced or compulsory human labour, human trafficking, child labour, debt bondage and deceptive recruiting for labour (collectively known as "Modern Slavery") in any part of our business or in our supply chain.

We expect our service providers, suppliers and contractors to share our commitment to act lawfully and ethically and to work to ensure that modern slavery is not taking place within its organisation or within its supply chain.

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CONFLICT OF INTEREST

A conflict of interest exists where a team member is in a position to make or influence a business decision which may benefit themselves or a related third party such as a partner, relative, business or associate.

The Company recognises the potential for conflicts of interest in a range of situations. All conflicts must be declared by team members. The Company will work with the team member to reach a satisfactory resolution.

WAGE THEFT

We take our responsibility to accurately pay team member wages and entitlements seriously. We will never deliberately underpay employees, dishonestly withhold wages or entitlements, falsify employee entitlement records to gain a financial advantage or avoid keeping employee entitlement records to gain a financial advantage.

Belgravia understands the impact to employees who can experience shortfalls in wage payments through honest mistakes from time to time. Priority will be given to investigate and resolve wage queries received by payroll.

APPROPRIATE USE OF INTERNET, EMAIL AND SOCIAL MEDIA

When team members use the Company's information systems, computer facilities or equipment such usage must be in accordance with the Company's Acceptable Use Policy.

Team members should not use the Company's information systems or network to view, upload, download or circulate any of the following materials

Team members should not use the Company's information systems or network to view, upload, download or circulate any of the following materials

- Sexually related or pornographic messages or materials
- Violent or hate-related messages or materials
- Racist or other offensive messages aimed at a particular company, group or individual
- Subversive or other messages or material related to illegal activities

Team members must ensure that any interactions with fellow team members, customers or anyone else we interact with via social networking sites, electronic communications or mobile devices are respectful and appropriate at all times whether the interaction occurs via a company or personal device/account.

OTHER EMPLOYMENT

Team Members undertaking other paid or unpaid work outside the Company should notify their manager to avoid any potential conflict of interest

Other paid or unpaid employment should not be undertaken during the period that they are employed to discharge duties for the Company and should not create a conflict of interest or adversely affect their responsibilities to the Company.

Team Members should refer to their Employment Agreement for further information related to other employment.



REPORTING

Reporting inappropriate workplace behaviour

If you believe that someone has acted or behaved inappropriately in the workplace, please raise your concerns with your manager. If the issue involves your manager, and you're not comfortable speaking with them, please raise it with another manager with whom you are more comfortable or someone from the People & Culture team.

In addition, **Speak-UP** is an employee reporting line that team members can use to report discrimination, bullying and harassment, unsafe work practises, theft or dishonest conduct, breaches to Company policies or other breaches to this Code.

Contact

Contact Speak-UP on 1300 933 977 or Online report at: <https://belgravia.grapevineonline.com.au> or Mail: PO Box 119 Carlton South, VIC 3053

Supporting team members who report inappropriate workplace behaviour

The Company encourages you to report inappropriate workplace behaviour if you are comfortable in doing so. Managers or People & Culture will deal with all reports in a sensitive and impartial manner.

Any situation where a team member feels they have experienced negative consequences as a result of raising a concern will be treated seriously. In the event of such a situation arising, please contact your manager, another manager with whom you feel comfortable, People & Culture or contact Speak-UP.

False or vexatious complaints can be very distressing for the people involved. If you intentionally make a false complaint you may be subject to disciplinary action, up to and including termination of your employment.

CONSEQUENCES

Consequences of inappropriate workplace behaviour

Behaviour that is inconsistent with the Code, or is a breach of company policy or legal requirement will be investigated. Whether a formal or informal investigation takes place will depend on the circumstances of the alleged breach.

Depending on the findings of any investigations, appropriate actions will be taken, and these could range from coaching of the relevant team member or formal warnings to termination of employment with or without notice.

Examples of inappropriate workplace behaviour which are likely to result in termination of employment include:

- Serious harassment, discrimination or bullying.
- Serious safety breaches including physical or psychological violence.
- Misleading or defrauding the Company.
- Theft.
- Misuse or wilful damage of Company property.
- A serious breach of Company policies, procedures or the law.



