



Policies and Procedures

Code of Conduct

Tenpin SA

Version 1

June 2014

This Code of Conduct clarifies the standards of behaviour that is expected of Tenpin Bowling Australia (SA Division) Inc. (Tenpin SA) staff in the performance of their duties. It gives guidance in areas where staff are required to make personal and ethical decisions. The Code applies to every employee (both permanent and temporary) and everyone working on our behalf – including contractors, consultants, volunteers and directors (collectively referred to in the Code as staff).

Staff must at all times:

- Consistently engage in personal and professional conduct that upholds Tenpin SA's standards and reputation,
- Consistently apply Tenpin SA's policies and procedures,
- Act ethically and responsibly at all times,
- Be accountable for their actions and decisions.

Outcomes:

- All staff conduct themselves in a professional manner,
- All staff understand their responsibilities and obligations, and have guidance when faced with ambiguous circumstances, ethical dilemmas and conflicts of interest,
- All staff appropriately respect the dignity, beliefs, rights and property of others,
- All staff work in and experience a positive, healthy and safe work environment.

Personal and Professional Behaviour Expectations

As a Tenpin SA employee, all staff are expected to:

- Perform their duties to the best of their ability and be accountable for their performance,
- Follow all reasonable instructions given by the Executive Officer,
- Comply with lawful directions,
- Carry out their duties in a professional, competent and conscientious manner,
- Seek suitable opportunities to improve their knowledge and skills, including through regular participation in relevant professional development activities and events,
- Act honestly and in good faith when providing advice and services,
- Be courteous and responsive in their dealings with colleagues, customers and others,
- Work collaboratively with their colleagues, customers and other key stakeholders,
- Be mindful of their duty to the safety of yourself and others, and be aware that if their conduct has the potential to damage Tenpin SA's reputation, even if it is in a private capacity, disciplinary action may result.

If a staff member is required to manage or supervise staff, then they are also expected to:

- Promote a collaborative workplace by developing a positive working environment in which all staff can contribute to Tenpin SA's growth and success
- Exercise leadership by working with their staff to implement performance and development processes that will drive results, improvement and innovation, and full commitment to quality and service
- Provide ongoing support and regular, constructive feedback to all of their staff
- Establish processes within their area of responsibility that effectively support staff communication, consultation and involvement in decision-making

- Take timely and appropriate action wherever a breach of this Code may have occurred.

Occupational Health and Safety

All staff are required to follow all relevant legislation, government and industry regulations and professional standards, company policies and other requirements relating to occupational health and safety.

Compliance with Legal and Regulatory Obligations

Staff must comply with all laws, regulations and voluntary codes that are applicable to Tenpin SA, together with Tenpin SA internal policies and processes. Any suspected, potential or actual non-compliance must be reported to the Executive Officer.

Duty of Care

Duty of care is a requirement that staff act toward others with the level of watchfulness, attention, caution and prudence that a reasonable person would in the circumstances. If their actions do not meet this standard of care, then they are considered negligent and damages may be claimed in a lawsuit.

Duty of care is the responsibility or legal obligation of a person or organisation to avoid acts or omissions likely to cause harm to others. It covers a wide range of matters including ensuring premises and equipment are safe, implementing strategies to prevent workplace bullying, and providing staff and volunteers with adequate supervision.

Recent legislation has introduced new duty of care elements and broadened the definition of workers who are owed a duty to include sub-contractors, outworkers and volunteers. Accordingly, a higher duty of care is now owed in work health and safety.

Alcohol and Drugs

Alcohol and other substance abuse may impair a staff member's ability to perform their work duties properly, and can have serious adverse effects on the health and safety of themselves and others, and on Tenpin SA's reputation.

Staff are not permitted to possess, distribute or consume alcohol or illicit drugs at work or to work while under the influence of alcohol or drugs.

In rare circumstances (e.g. Christmas approaching; achievement of a major company milestone), the Executive Officer may approve an early close of business and allow moderate consumption of alcoholic beverages for a limited period of time.

Staff have a responsibility to take prescription and pharmacy drugs in accordance with the instructions of their medical practitioner and normal directions relating to their usage.

Where prescription medication could potentially affect a staff member's ability to perform their normal work duties safely, they are required to promptly notify the Executive Officer so that corrective control strategies can be implemented. Failure to do so may constitute misconduct.

Equal Employment Opportunity (EEO)

Equal opportunity means treating people as individuals without making judgements based on stereotypes or on characteristics outlined in antidiscrimination legislation. These characteristics include but are not limited to sex, age, ethnic origin, sexuality, disability, pregnancy, religious conviction and marital status.

EEO is about making sure that workplaces are free from all forms of unlawful discrimination and harassment. This means having policies, practices, rules and behaviours that are fair and which don't disadvantage people because they belong to a particular group.

Staff decision making and conduct must always be consistent with the provisions of anti-discrimination legislation and with Tenpin SA's commitment to provide a work environment free from discrimination, harassment and bullying.

All Tenpin SA employees have the responsibility to:

- Respect differences amongst colleagues, customers and others
- Treat everyone fairly (not discriminate against or harass)
- Refrain from developing, distributing and/or storing material that is fraudulent, harassing, embarrassing, sexually explicit, obscene, intimidating, defamatory or otherwise unlawful or inappropriate
- Act to prevent harassment and discrimination against others in the workplace.

Working Relationships with Colleagues

Staff are expected to work cooperatively with each other. In particular, they are expected to:

- Support and learn from each other,
- Be respectful and accepting of individual differences,
- Respect, and proactively seek, the professional opinions of colleagues in their respective areas of competence,
- Provide timely and constructive feedback,
- Appropriately acknowledge the contributions and concerns of others.

Staff must comply with all lawful and reasonable directions given. Complaints arising out of such directions should be discussed, and attempted to be resolved, with the Executive Officer.

If dissatisfied with the outcome, a staff member can lodge a personal grievance to have the matter resolved. They must continue to carry out any lawful and reasonable directions that may be given until the matter is resolved.

Staff are encouraged to report any behaviour by other employees that they consider to be unethical to the Executive Officer. This may include behaviour they believe violates a law, rule or regulation or represents corrupt conduct, mismanagement of resources or is a danger to health, safety or the environment.

If a staff member makes such a report, they will be protected against reprisal providing their claim is based on a reasonable belief, is reported to an appropriate person, and is not

vexatious (malicious; aimed at causing annoyance or embarrassment).

Personal Presentation & Representation

Staff must:

- Maintain a high standard of grooming and personal presentation,
- Wear full issue of uniform and an identification badge when visiting customers and suppliers, or representing Tenpin SA in other public settings,
- Obtain the Executive Officer's prior approval before addressing or chairing a conference or seminar (in their capacity as a Tenpin SA employee)

Use of Company Resources

Staff must ensure that all resources within their area of responsibility are used effectively and economically in the course of their duties. Staff must never use their computer, telephone and network systems to communicate, view or distribute inappropriate, sexually explicit or offensive material or spread profane, derogatory, discriminatory or harassing comments, or threatening or abusive language.

While limited personal use of our computer, telephone and network systems is allowed, staff must ensure that personal use does not interfere with their work.

Security of information

Staff must ensure that sensitive and confidential company and customer information, and any information of a personal nature, is never left unattended or where it might easily be accessed by a third party who is not authorised to have this access. This includes:

- Leaving information in an unlocked and unattended office
- Leaving information on the screen of an unattended computer
- Allowing another person access to personal passwords
- Failing to close off documents and log off computers at the end of each work day.

The receipt of all confidential information into Tenpin SA must be carefully managed in order to comply with laws and policy. This includes storing the information so that only those who are required to use it may do so.

Personal information is any information or opinion about individuals, including customers and contractors (whether true or not), whose identity is apparent or can reasonably be ascertained from that information or opinion. This information must only be viewed, collected, used, disclosed, updated, stored securely and destroyed only in accordance with the Federal Privacy Act.

Financial Probity and Accountability

Staff must ensure that in all financial matters, including the handling of monies, there is full accountability for any advice or transaction they are involved in.

Staff with financial responsibilities must always act in accordance with the Tenpin SA's financial policies and observe all relevant legislative and regulatory requirements.

Prevention of Fraud and Corruption

All staff are responsible for the prevention of fraud and corruption. Fraudulent or corrupt activity involves dishonest actions, or dishonestly failing to act, that cause actual or potential financial loss, or an unjust advantage. This includes:

- theft of money, data or property,
- deliberately falsifying, concealing or destroying documents,
- acts of bribery.

A staff member who suspects fraud or corrupt activity may be occurring must report this to the Executive Officer.

Conflict Of Interest

A conflict of interest is a situation in which a person has a private or personal interest sufficient to appear to influence the objective exercise of their official duties.

Tenpin SA is committed to high standards of ethical conduct and accordingly places great importance on making clear any existing or potential conflict of interest.

Staff are required to act in Tenpin SA's interest and not in any manner designed to gain unfair advantage for themselves or their family, or for other individuals including friends and business acquaintances. This particularly applies to obtaining contracts and the purchase of goods and services.

Staff must disclose in writing to the Executive Officer any pecuniary or other personal interest held by them which could potentially lead to a conflict of interest between their private activities and official duties.

Gifts, Hospitality and Benefits

During the course of your work, gifts, hospitality or benefits in a variety of forms may be offered to you by customers, contractors or other business associates. As a Tenpin SA employee, you must exercise great care to ensure such offers don't compromise, or give the impression of compromising, your ethical standards and your ability to make impartial and objective decisions.

On occasions you may be offered hospitality including formal lunches, dinners and attendance at sporting events. Acceptance of such offers must be approved by the Executive Officer. Similarly, if you wish to offer formal hospitality, this must also be approved by the Executive Officer.

To protect the company and yourself, any offers of gifts, formal hospitality or benefits above the value of \$50, whether declined or accepted, are to be recorded in the *Gifts, Hospitality & Benefits Register*.

Token gifts and benefits are items such as souvenirs, chocolates, promotional goods (pens, notepads and coffee mugs) and gift vouchers valued at no more than \$50. These are generally acceptable if not offered regularly and received in the ordinary course of business.

You must immediately notify the Executive Officer if you receive an offer of a gift or benefit other than a token one. Acceptance of the same requires the Executive Officer's approval.

You should never accept gifts of cash (any amount), and/or free travel and accommodation.

You should never use your position in the company to encourage or obtain a private benefit.

Media Discussions / Publicity

Staff must not make public statements about Tenpin SA unless authorised by the Executive Officer. Staff are expected to actively support their colleagues and Tenpin SA's decisions. Staff must not put their personal agenda ahead of Tenpin SA and / or its members.

Staff must not make public comments in relation to any matter that is currently being considered or reviewed by the Board of Directors or a Committee of the Board of the Directors.

Social Media

Whilst Tenpin SA encourages its staff to make appropriate use of social media, staff must act lawfully and be transparent, responsible and respectful of Tenpin SA, its members, colleagues and everyone they interact with online. Unless specifically authorised to do so, staff must not post on social media as a representative of Tenpin SA.

Reporting of Breaches and Consequences of Breaching the Code of Conduct

All Tenpin SA staff are required to comply with this Code and report to the Executive Officer any conduct that may be in breach of the law, this Code or the underlying policies of Tenpin SA as soon as they can.

Any reports of a breach of the Code will be taken seriously and investigated appropriately.

If these investigations reveal breaches, appropriate disciplinary and remedial action will be taken. This may range from providing training, coaching and counselling, through to formal warnings or termination of employment. Each situation will be assessed in terms of the particular circumstances and facts. Appropriate action will be taken by Tenpin SA after consideration of all relevant details.