

APG & Co

THE BRAND ASSEMBLY

CODE OF CONDUCT POLICY

Introduction

The Employee Code of Conduct outlines the standard of personal and professional conduct that all employees must strive to uphold and behave, alongside ethical and professional mannerisms at all times. The Code provides a basis for all employees to maintain a working environment that is productive, positive, enjoyable, safe and free from harassment and discrimination.

Policy

The policy encourages employees and contractors to take responsibility for their conduct and provides clear guidelines and standards for the appropriate behaviour expected of APG & Co employees and contractors.

The Code of Conduct provides a framework for appropriate behaviour for all APG & Co employees how they:

- Conduct themselves towards other employees or colleagues, customers, contractors, suppliers and clients;
- Perform their duties and obligations;
- Fulfil the mission, goals, values and objectives of APG & Co; and
- Practice fairness and equity.

The Code of Conduct relies on individuals being responsible for their own professional behaviour, APG & Co policies, legislation and relevant industrial clauses that apply to individual contracts of employment.

Responsibilities

Managers and Supervisors are responsible and accountable for:

- Undertaking their duties and behaving in a manner that is consistent with the Code of Conduct at all times;
- Informing their teams about the Code of Conduct and relevant policies and procedures;
- Providing training and or counselling to ensure the required standard is met;
- Report any breach of the Code of Conduct by themselves or others and
- Acting consistently and fairly in dealing with behaviour that breaches this code.

All Employees have a responsibility to:

- Be personally responsible and accountable for their own performance, behaviour and attendance in the workplace and when representing APG & Co;
- Undertake their duties and behave in a manner that is consistent with the Code of Conduct;
- Report any departure from the Code of Conduct by themselves or others;
- Comply with all APG & Co and Department Store policies and procedures;
- Promote a positive, safe and healthy environment in the conduct of their work.

Personal Behaviour

At all times you are expected to demonstrate integrity, honesty and trust while at work and when representing the APG & Co outside working hours. Unacceptable conduct includes, but is not limited to:

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- Possessing or consuming alcohol or illegal drugs during working hours or while on work premises;
- Working under the influence of illegal drugs or alcohol;
- Using objectionable or obscene language towards customers, contractors, suppliers, clients or employees of APG & Co;
- Making objectionable or obscene gestures to customers and or/employees;
- Behaving in a fraudulent and dishonest manner for personal gain;
- Falsifying company documents;
- Misusing Employee Discount Card;
- Theft of property that is owned by APG & Co
- Making unauthorised statements or providing un-authorised information to the media (please refer to Media and Social Media Policy);
- Falsifying timesheets/attendance records;
- Inappropriate use of company information, systems or assets;
- Posting of inappropriate, confidential, false or malicious comments or materials online regarding APG & Co, your workplace, your colleagues, or customers. This includes but is not limited to social networking sites, emails and text messages;
- Breaching or failure to follow all APG & Co and Department Store Policies and Procedures;
- Discussing or talking about colleagues in a derogatory or slanderous way
- Promoting a dangerous work environment; and
- Unprofessional relationships and/or relations with peers, colleagues and managers with in APG & Co and Department Store.

Failure to demonstrate honesty, integrity and trust may result in disciplinary action, including dismissal.

Dress and Appearance

You are expected to dress professionally and appropriately while at work and representing APG & Co. Your line manager is responsible for determining the dress code appropriate to the environment, however the manager can make exceptions for medical purposes. Store employees are expected to dress on brand as during work hours you are a representative of the Company and brand. Please refer to the Grooming Guidelines.

Our Customers

APG & Co is committed to delivering an on brand customer experience for all customers through being consistent, innovative and efficient. You are expected to strive to provide our customers with service levels that exceed their expectation and create a memorable and lasting impression every time.

Retail – please refer to your brand Customer Service Standards guidelines for clarity

Electronic Devices

You need to ensure that personal electronic devices (includes but is not limited to smart phones, mobiles and other technology devices) are not used in customer facing environments to ensure the focus is on our customers at all times.

Company provided devices must be maintained, cared for and kept safe at all times and not used inappropriately.

Employee Discount Obligations

- The Employee Discount Card is for personal use only and not for goods for resale;
- The card is only for use by the person whose name appears on the card;
- Cardholders will be asked to present identification upon request at the Point of Sale;
- Misuse of the card is regarded as a breach of policy and may result in termination;

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- Employees cannot process their own transactions in any channel including but not limited to, in a freestanding store, concession, online or the VIP program;
- Employees leaving the company must return their card to their line manager on their last day of work.

Failure to comply with these obligations may result in disciplinary action, including dismissal.

Conflict of Interest

All employees of APG & Co are expected to declare any interest they might have that could adversely affect the company.

In some cases our individual interests may put us in direct conflict with those of the Company and this could cause unnecessary embarrassment for us or for the Companies reputation in the marketplace.

Examples of conflicts of interest are numerous and varied, however, to avoid any misunderstanding, you should disclose any dealings that may mean you:

- Do business with or are employed by a company that is a competitor of APG & Co;
- Do business with companies in which APG & Co or it's employees families have major interests;
- Do business with a supplier because they have provided a gift, a benefit or financial inducement;
- Have an immediate family member employed by a direct competitor in a senior role; and /or
- Any involvement in legal proceedings relating to employment.

Where a potential conflict of interest or opportunity for collusion may arise, these should also be declared to your line manager or a Human Resources representative.

Failure to disclose or resolve a conflict of interest is a serious issue. Failure to comply may result in disciplinary action, including dismissal. If you are concerned about your own situation it is recommended that you talk to your line manager so the issue can be clarified and resolved.

Gifts and Entertainment

From time to time we may receive gifts or invitations to dinner/lunch from suppliers.

Entertainment - You must inform your line manager and gain permission to attend. This does not include networking/educational events.

Gifts – All gifts received (above \$50 in value) must be declared and given to HR to put into a raffle for all APG & Co employees at Morning Business updates.

Records Management

To keep control of our business affairs it is important that we operate with relevant legislation and generally accepted accounting principles.

This means:

- We need to keep our books and records with accuracy;
- All of our financial transactions and funds need to be recorded truthfully and supported by proper paperwork so they can be audited reliably and reported honestly;
- No employee should deliberately keep or help another employee to keep records that intentionally mislead or hide the true nature of a transaction; and
- All funds and bank accounts need to be reflected in the Company books and no off book transactions are allowed.

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Company Property/Assets

Employees should take all possible care when using APG & Co property, goods, intellectual property and services to ensure they are used efficiently, carefully and honestly.

In being able to do your job you may be given access to assets that belong to APG & Co such as:

- Cash;
- Credit Cards
- Stock and merchandise;
- Company information; and
- Computers and software, including passwords.

Protecting and caring for these assets is your responsibility. Theft, misuse or wilfully damaging Company property is a criminal offence.

We all need to ensure that our actions in relation to Company property are honest at all times.

To ensure and avoid any misunderstanding of our behaviour we should remember to always:

- Seek permission from a senior manager to take company property from the workplace and ensure that its removal is documented;
- Always use Company property and business tools for their intended use and not for personal use unless approved e.g. Credit Card, Stock;
- Ensure every sale is processed through the Point of Sale in the correct way;
- Never assume that damaged or expired stock is not wanted or valuable to the Company; and
- For employees leaving the company, all company property must be returned.

If you believe that theft or damage is taking place in the workplace you should report it immediately to your line manager or a loss prevention representative.

Our Interactions

Just like our words and actions, messages and graphics in electronic form can be offensive to some people.

- Do not send racial, sexual, defamatory, threatening or obscene messages to any employee or anyone outside the Company;
- Do not download, retrieve, send or store inappropriate, sexually explicit or racist material on your computer or other company electronic device; and
- Do not instigate or distribute 'junk or chain' mail that can congest the network and inhibit the free flow of business information.

Consequences of Breach

Breach of this policy will be dealt with in accordance with the relevant employment contract and/or agreement and may lead to disciplinary action up to and including termination of employment. For contractors who are found to have breached this policy, there may be consequences including termination of contract. Where inappropriate use under this policy constitutes a breach of any law, action may also be taken in accordance with that law by APG & Co or concerned third parties.

Interpretation & Guidance

In the event that any additional guidance and/or further interpretation are required, please contact your Human Resources representative.

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