



Redcape Hotel Group  
Corporate Policy

**Values and Behaviours Policy**

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## Document Configuration Management

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### Preparation/Change Control

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### Release

Version	Date Released	Change Notice	Remarks
1.1	20/11/15	Initial policy published	For review annually
1.2	08/11/2017	Update to conflict of interest	
1.3	15/7/2020	General Update and update to Values	

### Distribution List

Name	Organisation	Title
All staff	Redcape	Venue staff

### Related and / or Reference Documents

Applicable documents are referenced documents that form a part of this document to the extent specified where it is referenced within the contents of this document.

Document Name	Location	Date	Version
Code of Conduct Policy	Corporate Governance Section of Company's Website	8/11/17	1.1



## Confidentiality

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## Contents

<b>DOCUMENT CONFIGURATION MANAGEMENT</b> .....	<b>2</b>
DOCUMENT IDENTIFICATION .....	2
PREPARATION/CHANGE CONTROL .....	2
RELEASE .....	2
DISTRIBUTION LIST.....	2
RELATED AND / OR REFERENCE DOCUMENTS .....	2
CONFIDENTIALITY.....	3
<b>1. INTRODUCTION</b> .....	<b>5</b>
1.1. SUMMARY .....	5
1.2. WHO DOES THIS POLICY APPLY TO? .....	5
1.3. WHERE CAN PERSONNEL GET A COPY OF THIS POLICY? .....	5
1.4. ADHERENCE TO THIS POLICY AND REPORTING.....	5
<b>2. CORPORATE VALUES</b> .....	<b>5</b>
<b>3. CORPORATE BEHAVIOURS</b> .....	<b>6</b>
3.1. WORKPLACE HEALTH AND SAFETY (WHS) .....	6
3.2. CONDUCT DURING HOURS OF WORK .....	6
3.3. TIME AND ATTENDANCE .....	6
3.4. CONDUCT OUTSIDE HOURS OF WORK .....	7
3.5. CONFLICT OF INTEREST .....	7
3.6. MANAGEMENT EMPLOYEES .....	7
3.7. UNDERAGE PERSONS.....	7
3.8. INTOXICATED AND DISORDERLY PERSONS.....	7
3.9. CONTROL OF CASH, STOCK AND ASSETS.....	8
3.10. MEDIA ENQUIRES.....	8
3.11. LIQUOR AND GAMING LICENSES AND RESPONSIBLE SERVICE .....	8
3.12. COMPLIANCE WITH LAWS AND GROUP POLICIES .....	8
3.13. GRIEVANCE PROCEDURES .....	9
3.14. BREACH BY EMPLOYEE .....	9
3.15. EMPLOYEE POLICES ARE SUBJECT TO CHANGE.....	10



## 1. Introduction

### 1.1. Summary

The Board of Directors (Board) of Redcape Hotel Group Management Ltd in its capacity as responsible entity of the of the Redcape Hotel Trust I (ARSN 629 354 614) and Redcape Hotel Trust II (ARSN 629 354 696) (“Redcape Hotel Group” or “Redcape”) are responsible for the overall management of Redcape and its controlled entities (Company), and play an important role in establishing, maintaining and enhancing the reputation of Redcape and its venues and ensuring that the high standards of ethics and behaviour that the Group is committed to, are observed. Employees must display the highest level of professionalism in all aspects of their work and comply with the Employee Values and Behaviours, all applicable laws, and other applicable Company policies as amended from time to time, details of which are available through online tools or through your Manager.

The Board has adopted and approved this Policy to be applicable to all of the Company’s personnel (all Redcape Hotel Group and its subsidiaries’ employees) (“Personnel”). The Employee Values and Behaviours has been prepared to confirm the Company’s expectations regarding conduct and behaviour, to guide employees through Company policies and practices, and to assist employees in their employment with the Company. It provides a common behavioural framework for all Personnel, irrespective of their job or location but is not intended to be all encompassing. There are areas in which the Company has or will develop specific detailed policies. The Employee Values and Behaviours are to be read and applied in conjunction with these policies. Nothing contained in the Employee Values and Behaviours overrides any relevant laws, regulations, awards or applicable license or permit conditions or creates contractual obligations on the Company.

### 1.2. Who does this Policy apply to?

This Policy applies to all Personnel.

### 1.3. Where can Personnel get a copy of this Policy?

A copy of this Policy can be found on the Company’s website and the intranet.

### 1.4. Adherence to this Policy and reporting

#### a) Adherence

This Policy has the full support of the Board and the Company, and the Company takes compliance with this Policy seriously. As a measure of accountability, compliance with this Policy is monitored by all Management on behalf of the Board.

#### b) Reporting

All Personnel have a responsibility to immediately report any breaches of this Policy to their immediate supervisor or other management, or through the Whistleblower Policy. All reports will be kept confidential and no person will be disadvantaged or prejudiced by reporting in good faith a breach or suspected breach of a law, regulation or provision of this Policy.

## 2. Corporate Values

All Personnel are expected at all times to act consistently with the Corporate Values of the Company:

1. Care;
  - We seek to understand others.
  - ;We recognise and praise great behaviour.
2. Collaborate;



- We're open to sharing our concerns, knowledge, experience and success. We value our promises.
3. Courage;
- We are curious and think innovatively.

## 3. Corporate Behaviours

### 3.1. Workplace Health and Safety (WHS)

Employees must ensure the workplace is safe for colleagues and our patrons at all times. Issues with respect to safety should be immediately reported to your supervisor, management, or, the GM, Risk and Compliance.

If a person is injured in any way at Company premises, appropriate first aid should be given immediately. As soon as possible, the Manager on duty must be informed. Under no circumstances are employees to admit liability or make statements on the matter to anyone without appropriate approval.

### 3.2. Conduct during hours of work

- a) Venue employees must not consume alcohol while on duty, or on venue premises between shifts or during breaks, nor may they smoke or eat in any public area within their venue while on duty, unless specifically authorised by the Venue Manager.
- b) Employees must not consume alcohol on or at venue premises, outside of the approved trading hours by the Regulatory body.
- c) No venue employee is permitted to gamble while on duty or, during breaks between shifts on venue premises or to have anyone place a bet for them. This prohibition applies to Gaming Machines, Lucky Ticket Machines, Keno and the TAB.
- d) Employees must not be under the influence of alcohol, illicit substances or intoxicants while on duty.
- e) Employees must not in any way adulterate, mislead or misrepresent products or services.
- f) Employees must not engage in any serious misconduct including without limitation: theft or fraud related activity, fighting in the workplace, or use of abusive or offensive language.
- g) All employees should be able to work in an environment free from unlawful discrimination, harassment, bullying or other unacceptable conduct. Employees must not engage in such conduct. Employees must act in accordance with applicable Company policies, relevant laws and standards expected of all employees in the workplace.
- h) Employees are required to represent Redcape in an appropriate manner. As part of this requirement, employees should observe appropriate dress requirements as determined by their Manager.

### 3.3. Time and Attendance

Every employee must report to work, ready to commence at the time indicated by the employee's relevant roster. If an employee is unable to attend work in accordance with their roster, or will be late for work, they must inform their manager as soon as possible, including the reason why they are unable to attend or are late.

Every venue employee must complete a time sheet accurately showing start times, finish times and break times and this should be submitted by the employee to the Manager on duty for the Manager to authorise, at the end of each shift. Unauthorised time sheets will not be processed to Payroll. Time sheets may be replaced by electronic recording of work times. If so, employees will be required to comply with the electronic recording system.



Repeated misconduct with respect to keeping hours of work per the employee contract may result in disciplinary measures.

### 3.4. Conduct outside hours of work

Venue employees are not permitted to drink at the completion of their shift at the venue at which they have been on duty unless invited to do so by the Venue Manager directly, with the Venue Manager present and within normal licensing hours. Any conditions imposed by the Company regarding drinking at the end of a shift must be complied with.

Venue employees are never permitted to gamble or have anyone place a bet for them on an Electronic Gaming Machine at the venue at which they are employed, at any time.

Employees are able to use the Company's venue facilities, including Keno and TAB facilities, while not 'on duty' subject to the following conditions:

- a) approval must be obtained to use facilities at the venue at which you are employed, if applicable, from the Venue Manager;
- b) all transactions must be paid for in full at the point of sale; and
- c) acceptable behaviour must be maintained at all times.

### 3.5. Conflict of Interest

Employees must not engage in the activities that involve, could involve, or may appear to involve a conflict between their personal interests and the interests of the Company.

Employees must never employ any direct member of their family without prior written approval from the Chief Operating Officer.

Employees must notify their Manager in writing of any potential or actual conflict of interest as soon as practicable. If any employee wishes to work for any other hotel or business with gaming machines they must seek the prior written approval of the Chief Operating Officer.

Employees must not enter into any contract, commitment or agreement on behalf of the Company, its subsidiaries or the venue, or approve any capital expenditure without prior approval or unless consistent with the company's Delegated Authorities.

### 3.6. Management Employees

Employees who perform a managerial or supervisory role may be subject to additional responsibilities and expectations.

The Company expects that employees in managerial or supervisory roles will set and comply with, a higher standard of professional conduct and act as a role model for other employees.

### 3.7. Underage persons

Employees must report the presence of underage persons who are unsupervised or in restricted areas to the Venue Manager or ensure immediate parental/guardian supervision, or removal.

Employees must never serve alcohol to underage persons.

### 3.8. Intoxicated and Disorderly Persons

Employees must report the presence of intoxicated or disorderly persons to their immediate supervisor or ensure appropriate action is taken. Under no circumstances is the person to be served alcohol and if there is any doubt, the Supervisor must be contacted.

The security of patrons and employees is very important to the Company. Employees should make themselves aware of the Company's Security Operations and comply with these requirements. Any non-compliance must be reported to their Manager.



Employees have a duty of care to all patrons including intoxicated or disorderly persons. Where necessary, employees must seek advice from their Manager on ways to ensure a suitable response is provided.

### 3.9. Control of Cash, Stock and Assets

Employees must not lend money to any patron or other employee under any circumstances. Employees are not to give, or to accept, any IOU's at any time.

Employees must follow the Company's and the Venue's Cash Policies & Procedures as amended from time to time. Employees must not assist customers to obtain cash through credit account transactions via the Company's or the venue's ATM or EFTPOS facilities.

Employees must not give away, or lend anyone, stock or assets under any circumstances.

Employees must not allow or give any discount to any person, except as authorised by the Venue Manager or by approved policy (eg staff discount policy). In the case of authorised discounts by the Venue Manager, this must be immediately recorded on the Company's authorisation documentation.

At the time of sale, any goods, property or services must be recorded appropriately and accounted for immediately, by either cash or charge, at the time of sale and where applicable, rung up on a cash register immediately.

Employees must not give any refunds except as authorised by their Manager. All refunds are to be completed by the appropriate Manager on duty.

Where an employee's duties include complete control of cash, that employee shall be responsible for that cash, until it is handed to the appropriate Supervisor or Manager on duty.

### 3.10. Media Enquires

Employees are not permitted to make statements to the media on, at or about any Company venue, service or product. Staff should say "No Comment" on any matters without approval.

Employees must keep all confidential information of the Company and its customers secret and confidential. This includes that confidential information must not be copied, disclosed or reproduced or misused other than in the course of the employee's employment or as required by law. Confidential information is defined in the Confidentiality and Intellectual Property Policy. Employees must comply with the Confidentiality and Intellectual Property Policy, as amended from time to time. Employees must comply with the Company's Privacy policy, as amended from time to time.

### 3.11. Liquor and Gaming Licenses and Responsible Service

The Company operates its venues pursuant to various liquor and gaming licenses. These licenses impose regulations and conditions on the operations of the business. Employees are required to comply with all such regulations and conditions in relation to their work activities and responsibilities. Employees must make themselves aware of these license regulations and conditions and comply with them. Any non-compliance should be immediately reported to their Manager.

If the Company is satisfied that an employee has been involved in a breach of a license condition, Act or Regulation, that employee may be subject to disciplinary action which could include termination of the employee's employment.

### 3.12. Compliance with Laws and Group Policies

The Company operates in a highly regulated business environment and its activities are subject to numerous laws, regulations and license conditions. Employees must ensure that they familiarise themselves with these laws applicable to their activities and act in accordance with these laws. If in doubt, employees are to seek advice from the Venue Manager or Area Manager.





In addition to the rights and responsibilities set out in this policy, employees must comply with other Company policies as amended from time to time. Details of these policies are available on Redcap's Compliance Portal or from your Manager.

### 3.13. Grievance Procedures

Should an employee have any grievance or complaint with respect to the actions or conduct of other Company employees or patrons, or compliance by an employee with any provision of this policy, or of other Company policies, then they should raise them with their Manager.

If the grievance or complaint is not resolved in this way, or if the employee does not feel comfortable discussing the issue with their Manager, then the matter should be raised with a higher Manager that they feel comfortable discussing the complaint or grievance with or through the Whistleblower Policy.

In order to manage the complaint effectively, the person who receives the complaint may take notes of the complaint or consult with other managers. You may also be asked to provide details of the grievance and/or complaint, including in writing, in order for Redcap to investigate the complaint. You may also be asked to participate in discussions deemed appropriate by the Company to amicably and professionally resolve the matter.

If a complaint is substantiated, the Company will take appropriate action which may include disciplinary action up to and including termination of employment.

Employees who raise genuine grievances or complaints will be provided a safe environment in which to speak up. However, if the Company is satisfied that an employee has brought a false, unfounded or vexatious grievance or complaint, the Company may take disciplinary action which could include termination of employment.

### 3.14. Breach by Employee

If the Company is satisfied that an employee has acted in breach of:

- a) the Employee Code of Conduct Policy;
- b) the Values and Behaviours Policy; or
- c) applicable licensing conditions, liquor or gaming legislation, work, health and safety legislation, anti-discrimination legislation, equal opportunity legislation, trade practices legislation or other laws;

it may take disciplinary action which could include termination of an employee's employment.

If the Company is satisfied that an employee has engaged in serious misconduct, the Company may immediately terminate that employee's employment without warning or notice. Serious misconduct includes without limitation:

- a) conduct that causes imminent or serious risk to health or safety of a person;
- b) being intoxicated or under the influence of alcohol, illicit substances or medication that affects the employee's capacity to perform their duties while on duty;
- c) theft, fraud, assault or related activity;
- d) unlawful discrimination, harassment, bullying or victimisation;
- e) fighting in the workplace;
- f) use of inappropriate language;
- g) being in any way engaged in other unlawful conduct (including without limitation any unlawful anti-competitive conduct, adulteration or misrepresentation of products and/or services);
- h) unethical, dishonest or unprofessional conduct;
- i) conduct that causes imminent or serious risk to the reputation, viability or profitability of the Company's business or assets;
- j) gambling whilst on duty or consorting with other parties on gaming products whilst on duty;
- k) conduct which constitutes unlawful discrimination or harassment, including sexual harassment;



- l) refusing to carry out a lawful and reasonable instruction that is consistent with the employee's contract of employment; or
- m) conduct that is inconsistent with the continuation of the employee's employment.

### 3.15. Employee Policies are subject to change

The Employee Values and Behaviours Policy (and all other Company policies), may be amended from time to time at the Company's absolute discretion. It is the Employees responsibility to check the latest versions of policies the company's information systems. Employees must ensure that they comply with the Employee Code of Conduct and Company policies and procedures as in place from time to time.

Questions about the Employee Values and Behaviours Policy should be directed to an employee's Manager.