



Redcape Group Ltd
Corporate Policy

Values and Behaviours Policy

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Release

Version	Date Released	Change Notice	Remarks
1.1	20 November 2015	Initial policy published	For review every 3 years
1.2	2 March 2016	Initial policy published	For review every 3 years
1.3	8 November 2017	Update to conflict of interest	
1.4	17 August 2021	Yearly update	<ul style="list-style-type: none">•Replace reference 'General Manager Risk & Compliance' with 'Risk and Compliance Manager'.•Replace reference 'General Manager Operations' with 'Area Manager'.•Replace reference 'Redcape Compliance Portal' with 'iViis'.

Distribution List

Name	Organisation	Title
All staff	Redcape	Venue and Venue Support 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	iViis	7 July 2020	0.3

Confidentiality

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1. Introduction

1.1. Summary

Employees of Redcape Group 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 Redcape Group policies as amended from time to time, details of which are available through online tools or through your Manager.

The Employee Values and Behaviours applies to all Directors, managers and employees of Redcape Group.

The Employee Values and Behaviours has been prepared to confirm Redcape Group expectations regarding conduct and behaviour, to guide employees through Redcape Group policies and practices, and to assist employees in their employment with Redcape Group. It provides a common behavioural framework for all Redcape Group employees, irrespective of their job or location but is not intended to be all encompassing. There are areas in which Redcape 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 Redcape Group.

1.2. Who does this Policy apply to?

This Policy applies to all Redcape Personnel.

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

A copy of this Policy can be found on iViis. Copies of this Policy will also be made available to all new directors and employees when they join the Company.

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 by a colleague to their immediate supervisor or other management, and Personnel should also report conduct where they are unsure whether a breach of this Policy has occurred. 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. we put the team first;
2. we do what we say we are going to do;
3. we are respectful, honest and act with integrity;



4. we are solutions focussed;
5. we focus on continuous improvement;
6. we invest and care about our people;
7. we are measured and consistent;
8. we build relationships; and
9. we engage in effective communications.

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 Risk and Compliance Manager.

If a person is injured in any way at a Redcape Hotel Group 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. Customer Service

Customers should be afforded the respect they deserve. Employees must be courteous and helpful and attend to customers' needs promptly and efficiently at all times.

3.3. 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 Redcape Group 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.

3.4. 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.

3.5. 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 Redcape Hotel Group regarding drinking at the end of a shift must be complied with.

Venue & Venue Support 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 Redcape Hotel Group'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.

3.6. 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 Redcape Group.

Employees must never employ any direct member of their family without prior written approval from their Area Manager.

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 their Manager or Area Manager, if they work in a venue.

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

3.7. Management Employees

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

Redcape Group 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.

3.8. 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.

3.9. 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 Redcape Hotel Group. Employees should make themselves aware of Redcape Hotel Group'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.

3.10. 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 Redcape Hotel Group'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 Redcape Hotel Group'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. In the case of authorised discounts, this must be immediately recorded on Redcape Hotel Group'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.

3.11. Media Enquires

Employees are not permitted to make statements to the media on, at or about any Redcape Hotel Group venue, service or product without appropriate prior approval in line with Media Policy. Staff should say "No Comment" on any matters without approval.

Employees must keep all confidential information of Redcape Hotel Group 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 Redcape Group's Privacy Policy, as amended from time to time.

3.12. Liquor and Gaming Licenses and Responsible Service

Redcape Hotel Group 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 Redcape Hotel Group 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.

3.13. Compliance with Laws and Group Policies

Redcape Hotel Group 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 Redcape Group policies as amended from time to time. Details of these policies are available on iViis or from your Manager.

3.14. Grievance Procedures

Should an employee have any grievance or complaint with respect to the actions or conduct of other Redcape Group employees or patrons, or compliance by an employee with any provision of this policy, or of other Redcape Hotel Group 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 or a Venue Support staff member that they feel comfortable discussing the complaint or grievance with.

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 Redcape to investigate the complaint. You may also be asked to participate in discussions deemed appropriate by Redcape Group to amicably and professionally resolve the matter.

If a complaint is substantiated, Redcape Group 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 Redcape Group is satisfied that an employee has brought a false, unfounded or vexatious grievance or complaint, Redcape may take disciplinary action which could include termination of employment.

3.15. Breach by Employee

If Redcape Group 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 Redcape Hotel Group is satisfied that an employee has engaged in serious misconduct, Redcape Hotel Group 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 employees 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 Redcape Hotel Group'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.

3.16. Employee Polices are subject to change

The Employee Values and Behaviours Policy (and all other Redcape Group policies) may be amended from time to time at Redcape'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 Redcape Group 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.