

## Code of Conduct

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### STATEMENT & SCOPE

The Forever New Clothing Pty. Limited (Forever New) Code of Conduct outlines the standards of behaviour and conduct expected by employees of the Company.

All Company representatives are required to observe the standards set out in this Code of Conduct. In addition, all individuals are expected to observe the highest standards of ethics, integrity and behaviour during the course of employment.

The purpose of the Code of Conduct is to provide an overview of the Company's fundamental business values and expectations. It is by no means exhaustive, but summarises the standards that underpin our business ethics and professional expectations.

You agree to comply with the Code of Conduct. Failure to comply with the Code of Conduct may result in disciplinary action including termination of your employment. It is your responsibility to ensure that you understand how this Code of Conduct applies to you. If you are uncertain about whether this Code of Conduct applies to you, or a particular situation, or have any other questions, please notify your manager or a HR representative.

### COMPANY RESPONSIBILITIES

The Company and its representatives are required to comply with all applicable local laws and regulations. In addition, the Company will:

- Promote a healthy and safe work environment free from harassment or discrimination
- Ensure employees are aware of the standards of performance and acceptable behaviour
- Respect the rights of all individuals and treat individuals with dignity
- Be procedurally fair and impartial in dealing with employees
- Be socially, ethically and environmentally responsible

The Company requires all representatives to perform their duties in accordance with expectations outlined in this Code of Conduct, their employment agreement and other company policies, guidelines, procedures, and standards of operations.

### EMPLOYEE RESPONSIBILITIES

As an employee of Forever New you are required to comply with:

- All company policies, procedures, rules and contractual obligations
- All reasonable and lawful instructions of managers/supervisors
- All relevant legal requirements in the performance of your duties
- Appropriate professional codes of practice

You must:

- Ensure competence and efficiency in the performance of your duties
- Not incur any liability on the part of the Company without the proper authorisation
- Refrain from negative portrayal of the business or brand, its employees or its products in any public forum including social media channels
- Refrain from unreasonable workplace absence
- Be a brand ambassador and perform duties in a competent manner observing relevant policies, guidelines, procedures, standards of operation and this Code of Conduct

In addition, you must demonstrate the Company's Team Values in all professional interactions:

THINK CUSTOMER
<ul style="list-style-type: none"> <li>Places the customer at the centre of all decision making</li> <li>Maintains strong and effective relationships through deep understanding of customer needs, then finds ways to meet these needs</li> <li>Considers the impact of all actions and behaviours on the customer</li> <li>Takes responsibility for being a brand ambassador and advocate</li> </ul>
RESPECT FOR ALL
<ul style="list-style-type: none"> <li>Is inclusive by recognising and valuing others</li> <li>Consistently provides accurate, relevant and timely information</li> <li>Provides constructive feedback and advice with illustrative examples</li> <li>Is punctual, acts with integrity and treats others with respect</li> </ul>
KEEP IT SIMPLE
<ul style="list-style-type: none"> <li>Actively seeks innovative, practical and efficient approaches to issues and opportunities</li> <li>Recognises when and how to cut through the noise and move quickly</li> <li>Removes unnecessary bureaucracy</li> <li>Distils out key elements from complex situations with ease, delivering clear messages and aligned actions with high impact</li> </ul>
TAKES RESPONSIBILITY
<ul style="list-style-type: none"> <li>Finds solutions rather than identifying problems</li> <li>Embraces and supports change initiatives</li> <li>Talks openly and directly</li> <li>Takes ownership for mistakes and learns from them</li> </ul>
ACT WITH PACE
<ul style="list-style-type: none"> <li>Can plan and organise self and others to ensure the timely completion of tasks</li> <li>Makes informed and timely decisions</li> <li>Prioritises effectively and consistently delivers to a high standard</li> <li>Keeps others informed of progress</li> </ul>

## CONFIDENTIALITY OF INFORMATION

During your employment with the Company, you will have access to confidential information. You are required to maintain and protect the confidentiality of any information, records, or other sensitive material you have access to during your employment and after the cessation of employment with the Company. You must not leave confidential information exposed on POS areas, work stations/desks, printers or meeting rooms.

You must not use the Company's confidential information for personal benefit or financial gain. You are required to notify your manager if you see or read information, records or other sensitive material that is not intended for you or for distribution. If you have any queries regarding whether particular information is confidential information please discuss this with your manager.

## CONFLICTS OF INTEREST

You must act at all times during your employment or engagement in the best interests of the Company. A conflict of interest occurs when the personal interests of an employee or volunteer interferes or competes with the interests of the Company.

Employees must avoid actual or perceived conflicts of interest, and must not seek personal gain through the misuse of their position.

## EXTERNAL EMPLOYMENT OR WORK ACTIVITIES

You are required to declare details of any external employment or work activities to your manager in writing. This requirement is intended to ensure the external employment or work activities do not jeopardise your performance, or pose an actual or perceived conflict with the Company's business interests.

## WORK ENVIRONMENT

### DISCRIMINATION, HARASSMENT AND BULLYING

Forever New aims to provide a workplace that is free from discrimination, harassment and bullying. Behaviour and actions in the workplace that may be interpreted as offensive, intimidating, belittling, threatening, harassing or violent are prohibited.

## **ALCOHOL AND DRUG USE**

Alcohol must not be consumed in any Company workplace at any time other than special celebratory occasions or events that are endorsed by senior management. Use of any illicit substance (or any substance that may affect the safety of yourself or others) is prohibited at all times in the workplace. If you attend work whilst under the influence of alcohol or drugs, or appear to be under such influence, the Company may direct you to leave the workplace.

## **SMOKING**

Smoking is not permitted inside any Company workplace, including any company vehicle.

## **PERSONAL BELONGINGS**

It is the responsibility of each employee to ensure their personal belongings are securely stored during the course of work.

## **FRAUD, BRIBERY AND CORRUPTION**

The Company and its employees are required to ensure fair business standards are upheld. Corruption, extortion, embezzlement or unlawful trade practices of any form are not permitted.

The Company does not give or receive, whether directly or indirectly, bribes or other improper advantages for business or financial gain. You must not obtain, or seek to obtain, a benefit or other advantage for yourself, the Company or others through acts of fraud bribery, corruption or unauthorised payments. This includes, but is not limited to, offering, giving or receiving any gift or payment which is, or may be construed as a bribe.

## **DISHONEST CONDUCT**

Dishonest conduct includes but is not limited to any practice, behaviour or activity which is illegal, unethical or improper, carried out in the course of, or in connection with the Company's business.

Theft or misappropriation of the Company's assets including property (e.g. fixtures, fittings, equipment and physical items) product (e.g. merchandise, stock, faulty stock), monies (e.g. any form of payment received in a transaction, any Company monies used in the conduct of business), and information (e.g. policies, procedures, manuals, customer details, supplier details, sales results, research, specifications, designs, concepts, records) and any property belonging to the Company's customers, employees or suppliers, is strictly prohibited.

Specific examples of dishonest conduct include, but are not limited to:

- Taking or using Company merchandise for personal use without authorisation and/or failing to pay, or account for it in the correct manner
- Taking, using, appropriating and/or not accounting for the Company's monies
- Giving any unauthorised discount to employees, customers, suppliers, family members, friends or others
- Unauthorised or improper manipulation of point of sale system, sales records, invoices or orders, trading return, or banking documentation to provide deceptive results or to conceal losses
- Not declaring shortages or overages in takings, stock counts, stocktakes, transfers or deliveries
- Improper manipulation of IT Systems (including Time and Attendance systems), including unapproved or unreasonable personal use of the internet
- Unauthorised disclosure of the Company's confidential information
- Participating in, passively supporting or facilitating dishonest activities
- Receiving or accepting any improper gift or benefit in breach of this Code of Conduct

Dishonest conduct may result in disciplinary action up to and including termination of employment or engagement as applicable.

## **CONDUCT**

You must perform your duties, and/or conduct yourself:

- Honestly, faithfully, diligently, and in a competent and ethical manner with regard to confidentiality obligations
- In a courteous, respectful and professional manner, including at work related events outside of ordinary work hours
- With due care and to the best of your knowledge and expertise
- With a view to promoting and enhancing the interests, welfare, business, profitability, growth and reputation of the Company
- In accordance with any lawful direction given by the Company from time to time
- In accordance with all Company policies, rules and procedures, applicable laws and values

## MISCONDUCT

Examples of the type of conduct that the Company considers misconduct, which may result in disciplinary action including termination of your employment or engagement as applicable, includes but is not limited to:

- Failure to adhere to Company policies, procedures, standards or expectations
- Acting in a negligent, careless, inefficient or incompetent manner while performing duties
- Non-adherence to reporting procedures for lateness or work absences
- Unauthorised absence from work including unauthorised absences during work hours
- Lack of application to assigned tasks
- Non-adherence to timekeeping and record keeping expectations including manipulating individual records
- Reporting for work in such a condition as to be unable to perform the required duties in a safe and proper manner
- Preventing or interfering with another employees in performing their work
- Engaging in any conduct that, directly or indirectly, poses a risk, or a potential risk, to workplace health and safety
- Failure to promptly report any workplace health and safety incident or actual or potential risk to workplace health and safety
- Making public comment regarding, or on behalf of the Company or any of its employees, suppliers or customers (including on social media) without authorisation
- Posting offensive written or visual material regarding, or on behalf of the Company or any of its employees, suppliers or customers
- Accepting gifts which would compromise your impartiality or integrity, or that of the Company
- Engaging in behaviour categorised as serious misconduct

## SERIOUS MISCONDUCT

Examples of the type of conduct that the Company considers serious misconduct and may result in dismissal, with or without notice or disciplinary warnings include but are not limited to:

- Engaging in any conduct that amounts to unlawful discrimination, harassment, bullying, violence or unwelcome behaviour directed to co-workers, members of the public, suppliers or customers
- Refusal or failure to undertake the inherent requirements of a position or to carry out the lawful and reasonable instructions of a management representative
- Intentional or recklessly damaging property belonging to the Company, customers, employees or members of the public
- Engaging in any unreasonable or inappropriate conduct towards other employees, members of the public or customers on the Company's premises, during work hours whilst undertaking any activities in connection with the Company
- Falsification of any record or document of the Company including but not limited to time-sheets, expense claims, medical certificates or company transactions
- The use of, or being in possession of illicit substances while on the Company's premises
- Reporting to work or being at work under the influence of alcohol or any illicit substances
- Engaging in behaviour detrimental to the quality or efficiency of the Company's services or operations
- Engaging in behaviour detrimental to the health and safety of employees, customers, suppliers or members of the public
- Unauthorised removal, copying or disclosure of company information, software, company records, documents, merchandise or any materials deemed to be the property of the Company
- Participating in, facilitating or condoning any practice, behaviour or activity, which is illegal, unauthorised, unethical or improper, or is not in the best interests of the Company
- Theft or misappropriation of Company assets, or the assets of the Company's customers, employees or suppliers, including, property, products, monies, and information
- Giving any unauthorised discount to employees, customers, suppliers, family members, friends or others
- Representing the Company in any unauthorised capacity including in relation to any sale, tender, auction or other disposal of property, rights, or other benefit without the express permission of the Chief Executive Officer
- Failing to act honestly in all dealings and matters during the course of employment
- Acting in any capacity which is deemed to be a conflict of interest

This list is not exhaustive and as such, the Company reserves the right to exercise disciplinary proceeding for matters it deems warrant such action. This includes instances of misconduct and serious misconduct not illustrated in this Code of Conduct.

## REPORTING MECHANISMS

You have an obligation to report any breaches of the Company's policies, rules, procedures, Code of Conduct which may include dishonest activities (e.g. fraud, theft, misuse of benefits), misconduct or serious conduct. Such concerns are to be communicated directly to your manager, HR or a management representative.