

KITCHEN GROUP

Code of Conduct Policy

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Owner

Human Resources

Classification

Company Confidential

Revision History

Date	Version	Author	Comments
September	02	Human Resources	Code of Conduct Policy replacing Code of Conduct Manual. 4.2 Addition to misconduct clause: 'Gossiping or spreading untrue or unconfirmed stories about individuals to the detriment of their reputation or personal well-being.'

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1. Policy Overview

To ensure Kitchen Group provides a positive working environment where the conduct of our people supports our business success, enhances our reputation and ensures compliance with applicable legislation.

2. Scope

Kitchen Group is committed to ethical conduct, consistent professional behaviour and compliance with the law. The standards we maintain are critical to our business success.

Everyone is required to take responsibility for their actions and the affect they may have on the Company, their colleagues and the surrounding environment.

It is expected that all Kitchen Group employees conduct business in a manner consistent with:

- A commitment to quality and customer service excellence
- The highest acceptable ethical and community standards
- Respect and courtesy for everyone
- Confidentiality in matters relating to business relationships
- Fair, honest and equitable dealings with employees and business associates
- Professional and intellectual integrity
- Protection and enhancement of Kitchen Group's image, reputation, profitability and success
- Judicious use of company time and resources
- Compliance with all Company policies and procedures
- Compliance with applicable laws

Where Kitchen Group's standards are breached, counselling and disciplinary action will occur, which could result in termination of employment for acts of serious or repeated misconduct.

3. Application

This Code of Conduct Policy applies to all Kitchen Group employees, contractors and/or visitors.

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4. Policy Elements

4.1 Responsibilities

- Comply with applicable laws and regulations.
- Adhere to high ethical standards by respecting the rights and dignity of all personnel with whom you are dealing and by not accepting illicit benefits nor extending such benefits to others.
- Not compete in any way with Kitchen Group's business and avoid conflicts of interest to the detriment of Kitchen Group.
- Keep Kitchen Group's business, financial and other information confidential and not misappropriate Kitchen Group's tangible or intellectual property.
- Actively help Kitchen Group in achieving compliance with this Code of Conduct.

4.2 What is Unacceptable Behaviour?

Kitchen Group will **NOT** tolerate unacceptable behaviour. Such behaviour may constitute **misconduct** or **serious misconduct**.

Unacceptable behaviours which constitute **misconduct** include but are not limited to:

- Failure to observe safety rules/instructions or failure to make proper use of personal protective equipment provided;
- Failure to report a work-related accident or incident;
- Using a mobile phone for personal use whilst operating machinery;
- Failure to comply with Kitchen Group legitimate instructions, practices and procedures;
- Disrupting the workplace by acts of undesirable behaviour and/or intentional misuse of time, equipment, facilities or resources and/or preventing another employee from carrying out their duties;
- Failure to notify your Manager / Supervisor of lateness or an intention not to come to work in a timely manner;
- Continued absenteeism or poor timekeeping;
- Gossiping or spreading untrue or unconfirmed stories about individuals to the detriment of their reputation or personal well-being.
- Unreasonable standards of appearance or inappropriate dress;
- The abuse of leave or work attendance requirements;
- Failure to Clock 'in' and 'out' when arriving and leaving work (if required to do so);
- Leaving site during shift without informing your Manager / Supervisor;
- The use of abusive, obscene or threatening language to another person on Kitchen Group premises (provocation will not be accepted as a reason);
- Discrimination, harassment or bullying of employees or visitors to Kitchen Group;
- Posting unauthorised or offensive notices within the workplace or the defacing of existing lawful notices;
- Acting in a negligent, careless or insolent manner in the discharge of duties or consistent inefficiency or incompetence in the performance of duties;
- Inadvertent failure to declare a conflict of interest, which may affect performance or judgment, to your Manager / Supervisor;
- Unsatisfactory attitude or lack of cooperation;

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- Any act or omission that impacts on the employee's ability to carry out the functions and duties of the employee's position or is likely to tarnish the reputation of Kitchen Group.

Unacceptable behaviours which constitute **serious misconduct** include but are not limited to:

- Behaving fraudulently;
- Dishonesty;
- The possession or consumption or sale of alcohol during work hours on Kitchen Group premises without permission of a Senior Leadership Manager;
- The possession or consumption of illegal drugs on Kitchen Group premises;
- Reporting for work or being at work in such a condition (i.e. under the influence of alcohol, drugs or medication) that prevents the proper and / or safe performance of duties;
- To be found intoxicated by drugs or alcohol whilst driving the Company vehicle;
- Failure to accurately record hours or work, including clocking in/out for others or having another employee clock in/out on your behalf;
- Falsifying company documents, including time clocks or time sheets and the abuse of leave or work attendance requirements;
- Possession or use of property belonging to Kitchen Group, its employees or visitors without the owner's permission;
- Theft or attempted theft or, wilful damage to, property belonging to Kitchen Group or a fellow employee or third party;
- Breach of confidentiality or security or unauthorised disclosure or misuse of personal information;
- Physical violence against any person on Kitchen Group premises, or a workplace where Kitchen Group employees work, or disorderly conduct;
- Discrimination, sexual, racial or other harassment or bullying of employees or any other person whilst on Kitchen Group business or premises;
- Failure to attend work without notification for three (3) consecutive days; which may be deemed as abandonment;
- Acting in a manner that threatens personal safety and health and / or the safety or health of other employees;
- Acting in a manner that prevents the safe and proper performance of the duties of other employees;
- Refusal or failure to undertake the duties of the position held, or to carry out the reasonable and lawful instruction of a Supervisor / Manager;
- Unauthorised possession of property or money belonging to or under the control of Kitchen Group or the use or manipulation of such property or money, company credit card misuse, information, intellectual property or privileges for personal benefit or in a manner not authorised by Kitchen Group;
- Deliberate failure to declare a conflict of interest, which may affect performance or judgement, to your Manager / Supervisor;
- Acting in an official capacity, in a manner which brings an employee and/or Kitchen Group into disrepute; or failing to act in an official capacity which results in bringing Kitchen Group and / or an employee into disrepute
- Gross failure to meet the minimum standards required in the employee's position causing actual or potential harm to Kitchen Group;
- Disregard or failure to observe non-smoking directives;

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- Falsifying Kitchen Group documents or expense claims;
- Falsifying a qualification which is a stated requirement of employment;
- Criminal offence outside working hours which, Kitchen Group's reasonable opinion, adversely affects either Kitchen Group's image or interests, or the employee's acceptability to other members of staff;
- Breach of the Company Information Security Policy.

4.3 Comply with all Laws & Regulations

Kitchen Group employees must comply strictly with all legal and statutory obligations.

4.4 Adhere to High Ethical Standards

All Kitchen Group affairs must be conducted and seen to be conducted in an ethical and honest manner. All employees are expected to act with honesty and integrity at all times. Lack of integrity in dealings involving Kitchen Group's business can harm Kitchen Group and may constitute a criminal offence. Kitchen Group employees are expected to match their works with deeds, to follow standard behaviour that is acceptable in the community, be respectful and follow an honourable path. Unethical or dishonourable behaviour is regarded as serious misconduct and is highly likely to result in dismissal.

4.5 Avoid Conflict of Interest

Employees must not be in a position of actual conflict of interest, place themselves in a position which may lead to a potential conflict of interest, or place themselves in situation which may be a perceived conflict of interest, between their personal interests and that of Kitchen Group.

A conflict of interest exists if an employee is involved in other employment, business or external activities that interfere with, or impact on, the ability of the employee to satisfactorily perform their duties or be in a position where the conflict of interest may lead to personal gain. Employees should ensure that their activities do not conflict with or adversely affect Kitchen Group's interests, deprive Kitchen Group of legitimate work time or compete with Kitchen Group's business.

An employee must notify Kitchen Group of any commitment to another employer, business or external activity which may lead to a conflict, or results in a conflict. This includes if your spouse or relatives are engaged in a business directly dealing with kitchen Group.

A serious conflict of interest which cannot be satisfactorily resolved may result in termination of employment.

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4.6 Tangible Property

Employees are not permitted to use Kitchen Group's resources or property, including work time, computer equipment, telephones, facsimiles, email system or any other Kitchen Group resources or property for any non-Kitchen Group activity (other than incidental, minor, personal purposes), unless prior approval for the use of that resource or property has been given by your Manager.

4.7 Privacy & Confidential Information

Kitchen Group respects the privacy of individuals whose personal information it holds and complies with relevant Privacy legislation. It is essential that all employees who handle personal information must comply with the Company's privacy procedures relevant to their duties.

It is also prudent to assume that all information in relation to Kitchen Group is confidential (including information about Kitchen Group's business and financial affairs, employees, intellectual property, its competitors, customers, products and services). As such, this information may only be disclosed to persons outside of Kitchen Group if and to the extent this is required during business transactions on behalf of Kitchen Group. This applies both during your employment and after you cease employment with Kitchen Group. In the case of doubt, please seek clarity from your Manager/ Supervisor.

4.8 Public Comments or Media Communication

Employees are not permitted to make any public statements and / or comments to the media about Kitchen Group without the prior written approval of the Chief Growth Officer.

4.9 Political Activities in the Workplace

Participation in political processes is voluntary and is a matter of personal preference. Participation must be made on personal time. In addition:

- Employees may not make any contribution from Company funds, property or services to any political candidate, party or committee without the prior approval of Kitchen Group's Chief Financial Officer;
- Employees may not pressure or solicit other employees to make political contributions or participate in support of a political party or candidate;
- Kitchen Group employees must comply with all national, state and local laws regulating participation in political affairs. This includes contributions to political parties, national political committees and individual candidates.

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4.10 Breach of Policy

Depending on the circumstances, non-compliance by an Employee with this Policy may constitute a breach of the Employee's contract of employment or some other contravention of the law. Employees who fail to comply with this Policy may face disciplinary action and, in some cases of repeated non-adherence with the Policy whether intentional or otherwise, termination of employment.

If you believe there is an actual or suspected breach of this Code occurring, it is your obligation to bring it to the attention of your Manager / Supervisor or HR Department. Any employee who makes a report in good faith will be respected and appreciated.

4.11 Variation

This Policy does not form part of the Employee's contract of employment. Kitchen Group may vary, replace or terminate this Policy from time to time.

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