

CG02 CODE OF CONDUCT

CORPORATE GOVERNANCE POLICIES VERSION 1: TIR BOARD APPROVED – 27 DECEMBER 2018





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Introduction

This policy / procedure defines the behavioural standards and boundaries we have set for ourselves, forming the foundation of everything we do and guiding every decision we make. TIR / IFP's values and ethical standards in business underpin this Code and as such are an integral component of it.

All TIR / IFP people must comply with the standards as detailed in this Code of Conduct. A breach of the Code of Conduct by an employee may result in disciplinary action up to and including termination of employment, or for non-employees and Directors, other appropriate sanctions would apply. In some circumstances, breaches of this Code, where underpinned by legislation, could also lead to criminal prosecution.

The Code of Conduct also operates with the Co-operative's policies, procedures, guidelines and work instructions. The Code of Conduct operates in conjunction with the legal and regulatory requirements of federal and state legislation, whole of government policy and directives, and industrial instruments.

Our Purpose

We support our members to achieve success, profitability and sustained growth, using the strength of our co-operative

Our Vision

To be a united force in Tasmanian food and grocery retailing, with a thriving network of independently-owned stores, trusted and favoured by our local communities.

Our Values

We are here to support our members

We are open and honest

We grow and innovate

We Care and listen

Strategy

Improve member satisfaction by increasing rebates and warehouse volumes, through using our brands, buying power and local expertise, and providing valued and efficient services to support our members and those that add value to our member network.

Scope

This Code of Conduct applies to all of us within TIR/IFP, our directors, our employees/our people, contractors and consultants. It applies from the Chairman of the Board, to the Chief Executive Officer, to the newest or most junior employee. We are all equal and responsible regardless of our role or position, for we all make an impact by our behaviours and our decisions.

The Policy outlines the minimum requirements and is compulsory.





Responsibilities

Our People:

- Must read in full and sign this Code of Conduct upon commencing work, project or assignment.
- Comply with this Code of Conduct.
- Seek guidance from their manager / leader / supervisor if unclear on their obligations under the Code.
- Immediately advise their manager / leader / supervisor of any breach or possible non-compliance with the Code, Co-operative policies or the law.

Directors / Retailer Network

- Every existing director must sign an acknowledgement accepting his or her obligation to comply with this Code in its entirety.
- Candidates seeking election as a director will be asked to confirm that they have read and understood it, and, if elected, must sign a similar acknowledgement confirming their obligation to comply with it.
- Our Retailer Network agree to act in a manner which complies with the Code of Conduct's behaviours, values and beliefs when dealing with our people.

Managers / Leaders / Supervisors:

- Are accountable for promoting, monitoring and evaluating the operation of this Code of Conduct within their area of responsibility.
- Have a responsibility to make fair, transparent and consistent decisions regarding any allegations of behaviour that does not uphold this Code.

People and Culture:

- Will support any TIR/ IFP person who reports genuine concerns of wrongdoing and manage any reports of suspected wrongdoing in a fair, transparent and consistent manner.
- Assist managers/leaders and supervisors to interpret this Code of Conduct.
- Will maintain controlled Co-operative policies and registers in compliance with the Code.

Making Decisions Ethically

When making decision about issues or cases, be consistent, prompt and fair. This involves dealing with matters in a non-discriminatory manner and with procedural fairness, and ensuring that all decisions and actions taken are in accordance with legislative requirements and approved policies and procedures.

When exercising discretion ensure that all relevant facts are taken into account when assessing the merits of the matter.

Ask the following questions before undertaking decision making or taking action in the course of your work:

- 1. Is the decision or conduct lawful?
- 2. Is the decision or conduct consistent with policy and in line with the Co-operative's objectives and Code of Conduct?
- 3. What will the outcomes be for:
 - 3.1. The employee
 - 3.2. Work colleagues
 - 3.3. The organisation
 - 3.4. Other parties e.g. participants, clients, retailer network, stakeholders
- 4. Do these outcomes raise a real or potential conflict of interest or lead to private gain?

Definitions

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Definition





Benefit	A non-tangible item of value (e.g. a new job or promotion, preferential treatment or access to confidential information) that one person or organisation confers on another.			
Bullying	Any behaviour that is repeated, systematic and directed towards a person or group of our people that a reasonable person, having regard to the circumstances, would expect to victimise, humiliate, undermine or threaten and which creates a risk to health and safety.			
Co-operative	Refers to Tasmanian Independent Retailers Co-operative Society as a whole inclusive of Island Fresh Produce and Tasmanian Independent Retailers divisions.			
Confidentiality	Confidentiality means not using or disclosing any information about participants, workers or TIR/IFP business unless it is a requirement of a worker's role to do so, or they are given authority or permission to disclose the information.			
Conflict of Interest	 Any situation where an employee (or someone close to them) has any personal interests that may conflict with the interests of TIR/IFP, by influencing, or having the potential to influence, that person's capacity to perform their duties fairly, impartially and in good faith. A conflict of interest may involve: pecuniary interests – opportunities for financial gain or loss or other material benefits non-pecuniary interests i.e. favours, personal relationships or associations. 			
	A conflict exists when a reasonably minded and informed person would form that view.			
Discrimination	Less favourable treatment of someone because of their sex, race, pregnancy, disability, age, marital status, religion, sexual preference or transgender identity or carers responsibility, and or being associated with the same.			
Duty of Care	All workers have a duty of care to maintain and ensure a safe work environment. All workers have a duty of care to participants and colleagues. Duty of care can be physical, emotional or financial; it is the obligation to take reasonable care to make sure that nobody in the workplace is harmed. "Reasonable" means the degree of care that could be expected from a competent and skilled person in the role.			
Gift	An item of value which one person or organisation presents to another. In the business context, gifts can have different meanings and purposes. As an employee, you may be offered a gift or benefit as an act of gratitude and there are some circumstances when to refuse a gift would be perceived as rude, insulting or hurtful. The purpose of the gift affects how it should be managed.			
	<i>Gift of influence</i> is a gift that is intended or may be perceived as being intended, to influence the receiver to provide the giver with favourable treatment or a benefit in the future. Such a gift is not allowable and must be reported to the CEO immediately so that they can assist with managing its return or other disposal.			
	<i>Gift of gratitude</i> is a gift offered in appreciation of performing specific tasks or for exemplary or ongoing performance of duties. Gifts to a representative, employee or guest who speaks at an official function, or to an employee who has provided personal or excellent support to someone throughout a particular period of time, or as a Co-operative provided special occasion gift (i.e. Easter / Christmas / work safe thank your award) would generally be considered gifts of gratitude. Provided that such gift is of nominal value, or approved by the TIR Board, it is generally acceptable for the receiver to retain such a gift.			
Harassment	Any form of behaviour that is not wanted, is not asked for and is not returned, that is likely to create a hostile or uncomfortable workplace by humiliating, intimidating or offending a person because of an attribute protected by law.			
Intellectual property	The various rights or bundles of rights which the law accords for the protection of creative effort. It includes manuals, publications, educational resources, digitised material and software that have been developed by or for TIR / IFP use.			
IFP	Island Fresh Produce – a division of Tasmanian Independent Retailers Cooperative Society.			
Lawful direction	A direction which falls within the scope of the person receiving the directions' position description, involves no illegality and which is reasonable in the circumstances.			
Misconduct	Improper, wrong or potentially unlawful conduct that is outside of policy, directions or the law. Examples include, but are not limited to assault, theft, blatant disregard			





	for policies, breach of this code, behaviour that is inconsistent with values or other		
	serious actions that may require investigation.		
Nominal value	The acceptable value of gifts that conforms to the Co-operative norms of acceptable		
	gifts and gratitude and would not normally infer inappropriate or corrupt conduct,		
	usually not more than \$20.00		
Our People	Our People includes our employees, volunteers, contractors, consultants, trainees,		
	work experience, officers and directors.		
Personal relationship	Any close relationship, including familial, marital, romantic, sexual or close		
	friendship and in the context of this policy, can also include financial relationships		
	such as business partners and associates.		
Privacy	The rules around the collection, storage, use and disclosure of people's personal		
-	and health information, and respecting people's right to autonomy and personal		
	space.		
Procedural fairness	Processes by which an outcome is reached and not the outcome itself.		
	Decision makers must:		
	 act in a transparent and objectively fair manner at all times 		
	 not pre-judge or appear to pre-judge the outcome 		
	 take into account and consider all relevant information 		
	deal with any issues in a timely manner		
Reasonable Instruction	The instructions given by an employer to an employee in the conduct of their		
	employment that are reasonable, for example:		
	 the employee has the knowledge, skill, capability and ability to carry out the 		
	instruction. Instructing an employee to do something which they clearly		
	cannot do, is unfair and unreasonable.		
	 The instruction falls within the ambit of the employee's role. (if it is not clear 		
	whether or not a particular task falls within the parameters of an employee's		
	role, then the objectives of the position description must be considered		
	along with the above.)		
Suppliers	Suppliers include, but are not restricted to, those from whom the Co-operative buys		
ouppliers	merchandise for sale, equipment, maintenance, construction services, trade		
	services and consultancies.		
TIR	Tasmanian Independent Retailers and / or may be referred to as IGA Tasmania		
	rasmanian independent Retailers and / or may be referred to as IOA rasmania		

HOW DO WE BEHAVE AND OPERATE? Doing the Right thing for the right reasons!

Our Co-operative Standards

- 1. Act with honesty, integrity and fairness, dignity and respect. We all must:
 - Act in the best interests of the Co-operative and Retailer Network and perform your duties with care and diligence and in a manner that upholds the Co-operative's values and reputation including any reasonable incidental duties they are requested to perform.
 - At all times be accountable for your own actions and decisions, ensuring you are doing the right thing for the long term.
 - Adhere to all policies and procedures and refrain from any corrupt conduct or fraudulent activity.
 - Advise your manager of any situation where you think there could be a breach of these expectations, and encourage others to do the same;
 - Promote the work and profile of TIR/IFP and Retailer Network in a positive way.
 - Treat everyone with whom you interact with dignity, courtesy and respect.
 - Deal fairly and honestly with each other, customers, suppliers and any other internal or external party;
 - Act in the best interest of TIR/IFP;
 - Behave in a manner that is appropriate to your position and ensure your conduct does not cause TIR/IFP, the Retailer Network, or other stakeholders, embarrassment or bring the reputation of TIR/IFP or IGA Tasmania into disrepute.
 - Project an appropriate professional image to the Retailer Network, our customers, our suppliers, the general public and other stakeholders our clothing should be suitable for the duties of the position.
 - Not knowingly participate in any illegal or unethical activity or enter into any arrangement or participate in any activity that would conflict with TIR/IFP's best interests;





- Not take advantage of your position or the property or information of TIR/IFP or its customers for personal gain or to cause detriment to TIR/IFP or its customers.
- Notify TIR/IFP immediately if you are charged with, or convicted of, a criminal offence.
- Comply with the terms and conditions of your Contract of Employment (COE).

2. Compliance with laws, rules and regulations

We respect the law at all times. TIR/IFP and our people are bound by the law. Compliance with all applicable laws and regulations must never be compromised. Additionally, our people must adhere to internal rules and regulations that are noted within our policies and procedures. These internal rules are specific to our Co-operative and our working environment and may go beyond what is required by law.

3. Working Environment

TIR/IFP aims to promote a safe, healthy and productive work environment. We believe all our people should feel safe and be safe at work at all times. All appropriate laws and internal regulations (including workplace health & safety laws) should be fully complied with at all times.

Everyone has a duty of care to take all reasonable steps to ensure their own and others personal health and safety in the workplace.

You are required to:

- Behave in a way that ensures your safety and the safety of others;
- Be fit for work when performing your duties;
- Do not consume any alcohol while on duty;
- Do not consume any illicit drugs while on duty;
- Do not attend duty affected by alcohol or illicit drugs;
- Report all hazards, incidents, or near misses;
- Follow all policy and procedures;
- Attend all safety training as required;
- Treat others in a manner which is not intimidating, offensive, bullying or in a harassing manner. This extends to TIR/IFP related functions outside of work premises and business hours.

You should familiarise yourself with TIR/IFP's policies and all relevant procedures, SWMS and checklists to ensure the workplace is safe and without risk to the health of others and yourself.

Our policies and procedures can be located on the Intranet under '*People Processes*'. You should follow any lawful and reasonable instructions consistent with our policies and procedures at all times.

4. Diversity and Inclusion

- You are to support all stakeholders and work collaboratively.
- Act in a non-discriminatory manner that promotes a harmonious working environment and treat everyone with dignity, respect, courtesy and fairness.
- Respect the beliefs, values and lifestyle choices of others according to their own values and preferences.
- TIR/IFP will not tolerate any form of unlawful discrimination, bullying, harassment and sexual harassment or any other inappropriate workplace behaviour. Such actions are against our values and are illegal and contrary to the Code of Conduct.
- The above requirements also extend to any of your behaviour and activity online which is linked to the TIR/IFP, our retailers, customers or stakeholders.

5. Engage in business relationships professionally and honestly

- Compete fairly and ethically for all business opportunities.
- Avoid conflicts of interest, report those that cannot be avoided and co-operate in their management.
- You must not act in a way that could cause harm to TIR/IFP's reputation during or after your employment.
- You have a duty to act in the manner that merits continued trust and confidence of the public and our retailer network at all times.





6. Fair Trading and Anti-Bribery

TIR/IFP is committed to compliance with the *Competition and Consumer Act (Cth)* and equivalent state legislation.

- We will deal openly, honestly, fairly and honour our stakeholders' / customers' rights
- We will deal fairly, honestly and transparently with our suppliers.
- We will assist our retailer network in how to comply with Consumer Law.
- We will follow safety and product information standards and action product withdrawals and recalls.
- We respect our competitors and the law by not misusing our position to restrict competition.

At TIR/IFP we will:

- Be fair and reasonable in our relationships and not use undue pressure, coercion or unfair tactics.
- Subject to the CG03 Gifts & Entertainment Policy, neither directly or indirectly offer, accept, promise
 or request cash or any other incentive or benefit, favourable treatment, inducement or reward in
 any form or engage in conduct involving money laundering, bribes, commissions, payments or
 other unlawful payments of any type.
- Report any known or suspected activity immediately.
- Not make any political donations.
- Ensure our records are accurate.
- Deal fairly with our competitors.

7. Conflicts of interest

A conflict of interest is a situation where you are faced with a competing loyalty that offers you a choice to pursue a personal benefit for yourself, a friend or a family member. It is the duty of all employees to avoid and to report all actual, potential or perceived conflicts of interest and to report any pre-existing conflicts of interest.

The following situations may amount to or be perceived as a conflict of interest;

- You have a personal interest that could possibly lead you to be influenced in the way you carry out your duties; or
- You have a personal interest that could lead a fair person to think that you could be influenced in the way you carry out your duties; or
- A family member, relative, friend, associate or anybody close to you has an interest that could lead to you being influenced, or to a fair person thinking you could be influenced in the way you carry out your duties; or
- You undertake private or secondary employment that compromises or could be perceived to compromise.

It is not necessarily wrong or unethical to have a conflict of interest; what is important is that it is identified and appropriately managed. Although managers have a key role in ensuring conflict of interest situations are managed appropriately, identifying a conflict of interest is the responsibility of all of us.

The best way to handle conflicts of interest is to avoid them entirely, where possible. If you think you have a conflict of interest (actual, potential or perceived) or are uncertain if one exists you should:

- Avoid the conflict of interest and do whatever is possible to eliminate or reduce it.
- Disclose the conflict of interest to your manager as soon as possible and work with them on a strategy to disclose, manage and implement action to manage the situation in accordance with work practices.

8. Outside Business / Employment Activities

You must declare any additional employment outside of your employment with TIR/IFP. This extends to providing services on a consulting or contracting basis or any other basis in which you have a financial interest, and applies whether the provision of such services are full-time, part-time, casual, volunteer, a hobby or ad-hoc, with or without pay.

We take your health, safety and wellbeing seriously and so adequate rest breaks between roles do apply. See People & Culture for more details relevant to your individual situation.

9. Suppliers

Our people are required to deal with external suppliers of goods and services to TIR/IFP and so must avoid placing themselves in any situation of potential conflict of interest. See definitions for Suppliers. CG02 - Code Of Conduct Booklet V3 - Draft Update Page 7 of 12 Created: December 2018 Version 3: 23 October 2019





Examples of potential conflict of interest include if you:

- Own any shareholdings;
- Have had other financial interests in the supplier;
- Have participated in the business of the supplier;
- Have conducted any private business with the supplier; or
- Have accepted a gift of shares or the opportunity to acquire shares in either an actual or potential supplier's business. This is only relevant if the supplier is linked to our industry.

Suppliers of goods and services to TIR/IFP have a responsibility to state if they supply to competitors. Note this does not apply to trade suppliers.

10. Co-operative Assets

TIR/IFP assets, including; goods, money, Co-operative credit, vehicles, stock, computers, phones, email, software, intellectual property or the services of other TIR/IFP employees (including contractors), must not be used for personal gain at any time. Our people shall safeguard and make only proper and efficient use of TIR/IFP's property and seek to protect our assets from loss, damage, misuse, theft, fraud or destruction.

Personal phone calls and emails are acceptable within reason. To the extent permitted under applicable law, TIR/IFP reserves the right to monitor and inspect how its assets are used by employees, including inspection of all email, data and files kept on Co-operative network terminals.

11. Keeping Accurate Records

TIR/IFP's financial and non-financial records are the basis for managing the business and fulfilling our obligations to our retailer network. Therefore, any financial and non-financial record must be accurate and in line with relative legislation, professional standards (accounting/employment etc.) and constitution.

12. Donations and Sponsorships

TIR/IFP is committed to helping our community by means of fundraising various charities each year. Any donations made are done so in a voluntary and transparent manner without expectation of any service in return.

TIR/IFP does not make any direct or indirect donations to political organisations, parties or individual politicians.

All sponsorship activities are based on written agreements and are proportionate to the services received.

Our Employment Practices

13. Workplace Bullying, Harassment & Discrimination

TIR/IFP is committed to a safe working environment for all our people and preventing and/or minimising risk to our people from acts of bullying. Workplace bullying, discrimination or harassment is a serious work health and safety issue and such behaviour is deemed to be unacceptable and may result in disciplinary action.

Our people have the right to work in an environment that is free from all forms of bullying, discrimination and harassment, regardless of where they are stationed. This could be from the office, to the warehouse, the retailers store, any environment, any location or setting anywhere across Australia where they are engaged to perform work. Our people have the right to be treated with dignity and respect.

TIR/IFP will not tolerate bullying, discrimination or harassment in the workplace. All our people, managers, directors and retailers must:

- Treat colleagues and people we support with courtesy, respect and dignity
- Not bully, harass or discriminate against colleagues, retailers or members of the public
- Intervene, where safe to do so, to stop inappropriate behaviour.

The reasonable business actions of a manager, including addressing performance concerns does not constitute bullying.





Bullying means any behaviour that is repeated, systematic and directed towards a person or group of our people that is a reasonable person, having regard to the circumstances, would expect to victimise, humiliate, undermine or threaten and which creates a risk to health and safety.

Discrimination means to treat someone less favourably (worse) than other people because they have a particular characteristic, such as their age, race, sex or disability. It is also discrimination when a person is disadvantaged compared to other people because they have a particular characteristic.

Harassment is any form of behaviour that is not wanted, is not asked for and is not returned, that is likely to create a hostile or uncomfortable workplace by humiliating, intimidating or offending a person because of an attribute protected by law.

If you feel that you are a victim of workplace bullying, discrimination or harassment, please contact your manager / leader, and/or People & Culture. Retaliation against individuals for raising claims of harassment or discrimination will not be tolerated.

For more information, please refer to our policies and procedures as located under *People Processes* on the Intranet.

14. Attendance, Punctuality & Dress Code

To ensure our business success and provide our retailer network with quality of service, we all need to play our part and a high level punctuality and attendance is expected at all times. If for any reason you are not able to attend work or you are running late please let your direct manager / leader know in a timely manner.

Dressing appropriately during work hours or when representing TIR/IFP is as equally important. Whilst keeping in line with our safety requirements at our various worksites, you should:

- Wear the appropriate level of professional business attire for your area. Open collar shirts with no ties are acceptable;
- · Wear the appropriate protective or safety clothing when required;
- Present to work clean, tidy and maintaining personal hygiene and grooming;
- Wear only TIR/IFP authorised logos or accessories (IGA or IFP branded caps etc.);
- Jewellery should be kept to an acceptable level reflecting business standards.

At the TIR Head Office, casual clothing is allowed on Friday's subject to no business meetings with external parties being undertaken. A gold coin collection is taken for this day and donated to our chosen charity (i.e. Cancer Council etc.).

15. Gifts and Entertainment

From time to time, you may be offered gifts or benefits in the course of, or incidental to your employment or engagement with TIR/IFP. Whilst these gifts may fall within the scope of normal and ethical practice for the giver, TIR/IFP's policy is in the first instance, to NOT accept gifts.

In some circumstances it may be difficult to decline or return such an offer without offending the giver, which means all offers must be advised to the CEO and recorded in the TIR/IFP Gift Register. No gift over the nominal value may be retained, and instead will be offered as part of a prize draw to the Retailers or raffled to staff with the proceeds donated to Charity.

If you are invited to attend an event or entertainment you must consult with the CEO or TIR Chairman to determine if there is adequate business rationale for your attendance. All offers must support our legitimate business interests and should be reasonable and appropriate. Full conditions of TIR/IFP's Gifts and Entertainment policy and register must be applied at all times. See *People Processes*.

Remember, under no circumstance can you receive a gift if such acceptance has any possibility of compromising, or appearing to compromise, either you or TIR/IFP.

16. Confidentiality & Privacy

In TIR/IFP's daily operations we require data, documents and information regarding business negotiations, procedures, transactions and contracts to which the Co-operative is party to be obtained, retained, processed, disclosed and internally circulated. Our databases do contain personal data which is protected by privacy laws.





During the course of your employment you may have access to some of our information relating to the operations of TIR/IFP. It is a requirement of everyone to maintain the confidentiality of all information you come across in your work.

All information, knowledge and data acquired or processed by you must be in the course of your employment duties and may not be utilised, disclosed or divulged without prior and specific authorisation being granted by your manager / leader.

You must at all times:

- Respect the confidentiality and privacy of colleagues and retailers.
- Protect retailer, supplier and customer information so that it is not made available to people outside of the Co-operative or anyone employed by TIR/IFP who does not have a legitimate work related need for the information.
- Not use TIR/IFP's information for financial or personal advantage.
- Not make or retain copies of confidential TIR/IFP materials off site.
- Protect the security of your computer/laptop/mobile e.g. always keep passwords private.

You have a right to seek access to your personal information held by the organisation. Please contact People & Culture for further details as required.

Remember in some cases, releasing information without proper authority could be a criminal offence. It is therefore important that you do not release any information without obtaining appropriate authority to do so.

Sharing Co-operative information without permission is a very serious issue and may result in termination of your employment. This extends to sharing confidential information regarding your colleagues.

17. Workplace Grievances - Treat with dignity & respect

We are expected to respect each other and work to resolve interpersonal issues directly with each other where possible. TIR/IFP expressly prohibits any form of discrimination, harassment and bullying at any time. This includes comments or posts on social media. When it is not possible to solve problems directly, you have the right to express your concerns about workplace problems and issues in an appropriate manner, and so you should become familiar with the different pathways for resolving these concerns.

When you raise a workplace concern, formal grievance or allegation, you are responsible for:

- Recognising your role in harmonious workplace relations.
- Being willing to resolve workplace problems and issues.
- Ensuring you have attempted to resolve the matter with the other person.
- Maintaining confidentiality.

You may seek help, information, advice or guidance to assist you in making an informed decision about the most appropriate resolution pathway. Appropriate sources of information and guidance include:

- Your manager / leader.
- Policies and procedures Intranet / People Processes.
- People & Culture team.
- Employee Assistance Program.
- The Union.

TIR/IFP expressly prohibits retaliation against any employee who raises a workplace concern or formal grievance or makes an allegation of harassment, discrimination, or workplace bullying, or against those who have in any way participated in the management and resolution of workplace issues and conflict.

Deliberately submitting a workplace concern, formal grievance or allegation with false statements or for malicious, vexatious or frivolous purposes is considered serious misconduct and will be addressed through the disciplinary process.

18. Media Contact

Under no circumstance is any employee of TIR/IFP to speak to the media on behalf of the Co-operative or our Retailer Network, offer personal opinions or provide background information to any media unless expressly authorised to do so by the Chief Executive Officer (CEO) or the TIR Chairman.





Any medial enquires should be referred to the CEO on 03 6391 0200. Failure to comply with this policy may result in the termination of your employment.

19. Social Media

Only the TIR Advertising and Marketing team are able to use Social Media for business purposes.

We recognise that you may use social media in your personal life, however just like our verbally spoken words and actions, messages and graphics in electronic form can sometimes be offensive to some people.

It is essential that you understand that comments you make via social media are as public as if you were making them to the media or at a public forum. Personal expression is your call however if your statements identify you as an employee or as associated with TIR/IFP or IGA Tasmania then a risk to the reputation of the business may potentially occur. Due to this you are responsible for the content you publish in a personal capacity on any form of social media platform.

Please ensure that you:

- Do not send racial, sexual, defamatory, threatening or obscene messages to any person connected to TIR/IFP or to anyone outside of the Co-operative;
- Do not download, retrieve, send or store inappropriate, sexually explicit or racist material on your computer/laptop/tablet/mobile or other TIR/IFP electronic device;
- Do not send junk or chain mail; and
- Report any inappropriate or unlawful activity that you become aware of, that relates to the Cooperative, or that breaches or is seen to breach this Code or any other TIR/IFP policy.

Further information on our Social Media policy can be found under *People Processes*.

20. Doing the Right Thing & Whistle-blower Protection

If you have concerns or genuinely believe that another person is doing the wrong thing and or breaching the Code of Conduct, please speak up.

TIR/IFP is committed to ensuring that you are not disadvantaged or discriminated against for reporting unacceptable behaviour in good faith.

21. Consequences of Breaching the Code of Conduct

TIR/IFP treats breaches of this Code seriously.

If you breach the Code, or assist someone to breach the Code, the breach will be investigated and may result in disciplinary procedures. The outcomes of these actions may range from a warning up to or including termination of your employment or association with TIR/IFP.

Some examples of breaches (but not limited to) of this Code that are considered serious misconduct and which will not be tolerated are:

- Serious harassment, sexual harassment, discrimination or bullying,
- Serious safety breaches, including physical or psychological violence or threats of violence,
- Misleading or defrauding the Co-operative or our retailers
- Theft from TIR/IFP or our retailers
- Actions resulting in serious damage to TIR/IFP or our retailers' business
- Consuming or trafficking illegal drugs or weapons
- Attending work under the influence of alcohol or other illegal drugs.

22. Who to speak to if you have questions

The Code of Conduct does not include:

- 1. Every ethical issue that you may face; nor
- 2. Every law and policy that applies to TIR/IFP.

In representing TIR/IFP/IGA Tasmania you are expected to act in a manner consistent with our key values.





If you have any questions regarding the Code of Conduct or any of TIR/IFP's policies at any time, please contact the People & Culture Group Leader.

23. Communication of the Code of Conduct

The Code of Conduct is to be communicated to all employees post the approval by the TIR Board.

All new employees, directors, officers, or contractors will receive a copy of The Code of Conduct as part of their induction process.

The Code is available to the broader teams of TIR / IFP via People Processes on the Intranet as required.

POLICY DEVELOPMENT USE ONLY

Changes, Linked Documents, Authorisation, Effective & Evaluation Dates						
	All TIR/IFP Policies, Procedures and Checklists					
Linked Documents	CG02-01 Code of Conduct Declaration Form					
Policy Changes	This policy may be rescinded, changed or replaced at any time at the absolute					
	discretion of the TIR Board, CEO or authorised delegate.					
	Chief Executive Officer					
Authorisations	TIR Board of Directors					
	People & Culture Group Leader					
Prior Relevant Documents	This policy supersedes any prior Code of Conduct Policy, verbal or written.					
Effective Date	V1: 1 January 2019					
Current Version	V2: 21 March 2019					
Next Review Date	Prior to end of 2021					

Evaluation History							
Date	Author	Sections Modified	Details of Amendments				
December 2018	N Banfield G Hinchcliffe D Milner	ALL	Document creation, parameters set and implementation of draft to the Board for review.				
27 Dec 2018	M Baxter (Chairman)	ALL	Board Approval as of 27 December 2018				
21 March 2019	TIR Board	Section 6	The wording 'Subject to policy "				
23 October 2019	N McCullagh	Section 1	Update of Purpose, Vision, Values, Strategy				