

Rural Press Pty Ltd - CODE OF CONDUCT

Dated	January 2020
Next Review Date	January 2022
This is a new policy for Rural Press Pty Ltd and its related bodies corporate group of companies (together the “Company”), therefore replacing any prior versions.	

INTRODUCTION

Rural Press Pty Ltd and its related bodies corporate (together the “**Company**”) is a trusted voice, informing, engaging and entertaining audiences and communities throughout Australia. Everyday, we empower and enrich the lives of millions of people with our independent, quality content and great experiences.

Our digitally-driven media network of leading information, marketplaces and entertainment brands provides powerful connections between advertisers and our large, diversified audiences. Honesty, trust and integrity are defining characteristics of the way we work. In all our dealings, with our colleagues and external parties, we maintain transparency and take accountability.

In this Code we set out the minimum standards of behaviour, aligned to our culture and values, across all Company brands, assets and operations.

Application

The Code applies to all Company employees, contractors, contributors, volunteers and interns in Australia (“Workers”).

Editorial Code of Ethics for our mastheads may also apply to you depending on your role, along with other Company policies and guidelines.

General principles

Sometimes we may be faced with situations that are not directly addressed by this Code. When faced with such a situation, consider your actions in light of the following questions:

- Is it legal?
- Is it ethical?
- Is it consistent with the Company values?
- What would be the impact if your actions were reported in the media or your peers and family were to find out?
- Is it in the best interests of the Company?
- Would you be proud of your actions?

If you are still unsure about a specific situation, seek guidance from your Manager or your People and Culture representative.

HOW WE INTERACT WITH OTHERS

Respect and fairness

We respect our colleagues, customers and business partners. We strive to work collaboratively and value the contributions of others. We respect differences of opinion. We treat people fairly to build a trusting work environment.

Honesty and integrity

We perform our duties in an honest and transparent manner to maintain a good reputation, personally and for the Company. We are responsible, honest and accountable in our dealings with each other, our customers and audiences.

ACTING IN THE COMPANY'S BEST INTERESTS

Secondary employment – approval required

We all contribute to the Company's success by doing the best work we can. An employee's contribution or capacity to perform duties may be affected by engaging in secondary employment or undertaking unpaid work for another organisation. Our integrity and ability to act in the best interests of the Company may also be compromised by outside work and activities.

You must seek and obtain permission from your Manager and People and Culture representative (for your business unit) before undertaking any paid secondary employment. Permission will not be unreasonably withheld.

If outside activities (such as voluntary work or business activities) interfere with your usual duties, or create a conflict of interest, you must discuss these activities with your Manager. Your Manager may determine that these outside activities are not consistent with the role you perform for the Company.

Declaring conflicts of interest

You must avoid situations which give rise to a conflict, or a perceived conflict, between the interests of the Company and your personal interests. You must declare any potential or actual conflicts of interest to your Manager and follow management direction to eliminate or address such conflicts.

Examples of conflicts of interests include:

- Commercial relationships or dealings with friends or relatives
- Secondary employment
- Outside activities, including voluntary work and business activities
- External board memberships
- Personal relationships with Company clients, customers, partners or suppliers
- Associations with, or interests in, other entities, including Company competitors.

The best way to manage a potential conflict of interest is to be up front and discuss it with your Manager and/or People and Culture representative.

Gifts and benefits

You must not use your position at the Company to solicit an advantage or gift/benefit from a third party in connection with your employment.

Gifts in the form of any cash are not acceptable under any circumstances.

You should follow all business unit guidelines that apply to you relating to the declaration and approval of gifts/benefits from third parties.

Examples of such gifts/benefits may include: discounts, priority bookings, travel and accommodation, access to venues, retail or wholesale sales, restaurant bookings, real estate queues and upgrading of goods or services.

You must comply with any requests from your Manager or an Executive Leadership Team (ELT) member for details and supporting documentation relating to any gifts/benefits you may be offered.

HEALTH AND SAFETY

We are all responsible for maintaining a safe and healthy work environment for employees, contractors, volunteers and visitors at our work sites.

The Company does not tolerate the use of illegal drugs at work or at work related functions.

You must be familiar with and abide by Company policies and guidelines relating to health and safety, such as the:

- Occupational Health and Safety Policy
- Workplace Behaviour Policy: Harassment, Discrimination and Bullying
- Drugs and Alcohol within the Workplace Guideline
- Environmental Policy

You must also participate in relevant health and safety training to ensure you carry out your work activities in a safe manner.

If you become aware of any safety risks or safety incidents, these must be reported to your Manager and recorded in the company's injury and risk management system.

EXTERNAL COMMUNICATION AND SOCIAL MEDIA

External communications shape and influence the Company's valuable brand, reputation and overall commercial position. The Company actively manages its brand and reputation and has established communication protocols that should be followed.

Unless authorised to do so, you must not speak publicly on behalf of the Company, publicly discuss or disclose confidential Company matters, or represent your personal views as those held by the Company (especially in a public forum or on social media).

You must seek prior approval from your Manager for any speaking engagements or presentations outside of work, such as conferences and public engagements.

If you receive any inquiries from the media or any other government or non-government organisation, you must refer these to the Executive Editor or Editorial Director.

Your activities on social media may reflect negatively on the Company's brand (as well as your personal brand), and you should always be mindful of this. You must not use social media in a way that could embarrass, disparage or cause damage to the Company's reputation.

You must comply with the Company's Social Media Policy, which provides further guidance as to what are acceptable and unacceptable uses of social media.

BUSINESS INTEGRITY

Accurate reporting and expenses

We recognise the importance of complete, timely and accurate business records and Company data, including data relating to business expenses. You are responsible for complying with the Company's employee expenses policy. This includes ensuring that business expenses you incur are reasonable, within prescribed limits, and that you follow procedures for reimbursement in a timely manner.

If you suspect or become aware of any inaccuracy or falsification of company records, contact your Executive Leadership Team (ELT) member, your Manager or it may be appropriate to consider the Company's Whistleblower Policy.

Fraud

You must not engage in dishonest activity that causes actual or potential loss to the Company and/or its customers, such as theft or misappropriation of money. You should never deliberately falsify or destroy business documents or improperly use information or your position for personal financial gain.

BRIBERY AND CORRUPTION

You must not offer bribes or any form of inappropriate rewards for the purpose of acquiring or retaining business, or receiving any kind of special or favoured treatment for the company. It is also not appropriate to accept any bribes or inappropriate rewards for any purpose in connection with your position.

Do not give anything of value to a government official without prior approval from your Manager. Be mindful that politicians and government officials may be subject to strict rules regarding gifts and hospitality. Avoid situations which may be perceived as attempts to influence politicians or government officials.

CONFIDENTIALITY AND PRIVACY

You may find yourself in a position of trust and have access to confidential information relating to our business and customers. You must not use such information for personal gain, or share it with parties outside the Company.

You must not disclose or discuss any confidential information relating to the Company with anyone who is not authorised to receive such information (this may include other employees and external parties).

Confidential information includes (but is not limited to): financial information, strategic plans, pricing and costs, employee and personnel information, marketing initiatives, customer lists, terms of trade, internal communications (such as staff announcements and contents of staff meetings) and any information designated by the company as being confidential.

Confidentiality obligations continue to apply to employees even after they leave the Company.

PROPERTY AND INTELLECTUAL PROPERTY

We are responsible for taking care of company property and using it responsibly. Theft, misuse or deliberate damage to company property is not acceptable conduct.

It is important that our IT network and infrastructure remains secure and functions effectively. You must not misuse IT resources - this includes excessive personal use during work hours, breaching software licence conditions and disrupting or disabling automated security systems. For further details, please refer to the Computer Use Policy.

The Company's intellectual property is a valuable asset and must be protected at all times. You must not misuse third party intellectual property in connection or association with the Company (this includes any misuse of company resources and technology). If you are unsure whether or not your actions may infringe the intellectual property rights of others, please contact your Executive Leadership Team (ELT) member.

DIVERSITY AND INCLUSION

The Company is committed to a fair and inclusive workplace that reflects the diversity of the communities in which we operate. We recognise that each employee brings their own unique capabilities, experiences and characteristics to the Company.

We all have a responsibility to ensure the work environment is free from unlawful discrimination, harassment and bullying.

We respect workplace diversity and engage with others in a lawful and appropriate manner at all times. We do not tolerate behaviour in the workplace that is intimidating or belittling, disrespectful, discriminatory or harassing.

BREACHING THE CODE AND REPORTING BREACHES

The Code sets the minimum standards of conduct expected of all Workers.

A breach of the Code by an employee may lead to disciplinary action. The company will determine the disciplinary action that is appropriate in the circumstances. The forms of disciplinary action that may be taken include (but are not limited to): counselling, warnings and termination of employment.

We support individuals in coming forward to report breaches. However, vexatious or malicious reports may result in disciplinary action.

Speak to your manager or People and Culture

If you become aware of any behaviour that breaches the Code, raise it with your Manager or People and Culture representative as soon as possible rather than simply ignoring it.

Reporting financial malpractice

If you suspect or become aware of a breach that involves financial malpractice or fraud, this should immediately be reported to:

- The Chief Financial Officer (CFO)
- The Chief Officer (CEO) or
- It may be appropriate to consider the Company's Whistleblower Policy.

Whistleblower Hotline

The Company's Whistleblower Policy sets out how you can raise reportable matters, who to report them to and how the Company will protect whistleblowers.

One option to raise these matters is via the Whistleblower Hotline, a dedicated external service in which you can report concerns of wrongdoing in the workplace. An incident report will be provided to a Company nominated representative – you may choose to remain anonymous.

The hotline is currently managed by Stopline. Australian staff may phone 1300 30 45 50 anytime.

Other methods for raising a reportable matter with Stopline include the following:

Stopline Portal: <https://austcommunitymedia.stoplinereport.com/>

Email: austcommunitymedia@stopline.com.au

Post: Australian Community Media c/o Stopline, Locked Bag 8, Hawthorn VIC 3122

Fax: Australian Community Media c/o Stopline: 03 9882 4480

App: Search for Stopline in the iTunes App Store or Google Play to download the free app and submit a disclosure.

Further information on whistleblower processes is contained in the Company's Whistleblower Policy.

FURTHER GUIDANCE AND RESOURCES

In addition to the Code, Workers are required to comply with the Company's policies. These policies can be located on the intranet.

You are encouraged to contact the following if you need further guidance about compliance with the Code:

- The Head of People and Culture;
- Your People and Culture Business Partner;
- Your ELT member.

Other Related Documents

- Workplace Behaviour Policy: Harassment, Discrimination and Bullying
- Diversity and Inclusion Guideline
- Occupational Health and Safety Policy
- Drugs and Alcohol within the Workplace Guideline
- Social Media Policy
- Computer Use Policy
- Privacy Policy
- Whistleblower Policy



Allen Williams

Chief Executive Officer

Australian Community Media