



# Code of Conduct Policy

SP Hunters is committed to ensuring an ethical culture exists across the Game. The Code of Conduct Policy (the Code) is underpinned by our Beliefs of Inclusive, Positive, United, Disciplined.

It is designed to ensure you are clear on what behaviour we expect from you, and what behaviour is not tolerated. Adherence to the principles set out in the Code will contribute to the development of a positive culture that will maintain and enhance the integrity and reputation of SP Hunters.

## Purpose

Our Code of Conduct Policy outlines our way of working and its purpose is to support SP Hunters rules relating to behaviour and provide details of the minimum standards of conduct expected of our staff in the performance of their duties, including their dealings with other SP Hunters employees, clubs, players, club officials, clients, and other stakeholders.

- 1) Compliance with the Code is a condition of your appointment as an employee of SP Hunters.
- 2) An effective Code will result in:
  - a. A culture of integrity and compliance with relevant laws and industry standards;
  - b. Effective management;
  - c. Minimisation, management or elimination of liabilities;
  - d. Protection and enhancement of the best interests, image, wellbeing and sustainability of SP Hunters and our people, SP Hunters competitions, representative competitions, other competitions, the clubs and the game.

The Code sets out the minimum standards of conduct required from you in respect of legal, regulatory and industry compliance, as well as standards of acceptable behaviour and interaction with our stakeholders.

## Policy Elements

### Definitions

- The Code: The 'Code' refers to the Code of Conduct Policy
- Conflict of Interest: A situation in which a person is in a position to derive personal benefit or gain from actions or decisions made in their official capacity which could be financial or non-financial
- Contractor: A contractor is any person or firm that undertakes a contract to provide services in partnership with the SP Hunters
- Employee: An employee is any individual with a valid SP Hunters employment contract, regardless of the nature of the contract
- Stakeholder: includes any person, company, government or non-government organisation that would have an interest in Papua New Guinea Hunters Rugby Football Club Limited normally through their dealings in the normal course of conducting its business with SP Hunters. This includes but is not limited to, Directors and employees, SP Hunters Affiliated Clubs and Leagues, IRL Clubs, Players, Club and League Officials, Clients, Government (Local, State and Federal), Auditors, Suppliers, Members, Volunteers or any other individual with a vested interest in the Game

### Personal responsibility when dealing with the organisation

Your personal conduct and actions have a significant impact on our reputation, and you are required to act in an honest, professional and responsible manner in line with SP Hunters policies, procedures, and regulations that relate to your role. In your dealings with stakeholders you are required to act in both an ethical and fair manner in accordance with the following principles:

- You will at all times exercise due care and diligence in performing your duties and responsibilities

- You will ensure that you communicate with all relevant and industry stakeholders appropriately and in a full, frank and timely manner
- You will protect and efficiently use the property and assets of the SP Hunters only for the legitimate business purposes of SP Hunters
- You will adhere to our accounting and financial policies and practices
- You will not interfere with SP Hunters external auditors in the performance of their duties, nor any other duly authorised person undertaking a review of SP Hunters compliance systems. Such interference will be a breach of this Code and may also be a breach of the Corporations Act 2001 (Cth)

#### **Compliance with laws, SP Hunters policies and procedures**

- You must comply with, and promote compliance with, the laws and regulations that govern the operations of the SP Hunters, and the Administration Framework of SP Hunters including this Code and other Policies such as the Gambling Policy, Social Media Policy, and Workplace Health, Safety Policy.

#### **Avoid Conflicts of Interest**

- You must avoid or properly manage any circumstance that could result in a conflict of interest or perceived conflict of interest with or be prejudicial to the business or SP Hunters and its stakeholders
- More specifically:
  - You shall not act in an official capacity in respect of any SP Hunters game or competition in which you have a pecuniary interest;
  - You cannot pursue an interest or other employment or business venture which directly or indirectly competes with SP Hunters without the written consent of the Managing Director (or, in the case of the Managing Director, SP Hunters Board)
  - You cannot pursue an interest or other employment or business venture with a supplier to SP Hunters without the written consent of the Managing Director (or, in the case of the Managing Director, SP Hunters Board)
- You cannot be involved in a procurement or sponsorship activity in an evaluation or decision-making capacity, if you have any form of interest, other employment, business venture or personal relationship with a supplier or sponsor involved in that activity;
- You cannot be involved in a recruitment process if you have any immediate relationship with the candidate;
- You should ensure that your personal relationships and dealing with stakeholders do not put the integrity of your business relationship with them at risk;
- You must not accept commissions or incentives from suppliers to SP Hunters or provide commissions or incentives to clients of SP Hunters;
- You must ensure that all gifts are free from obligation or expectations of favours and report any offers or receipt of gifts, valued in excess of \$100;
- You are not permitted to use SP Hunters property or information, or your position for personal use without prior written approval from a Senior Leadership Team member or the Managing Director;
- In the event a conflict of interest arises, you are to immediately inform your Leader who will take action to protect SP Hunters, and depending on the circumstances, may require you to no longer participate in the transaction, decision or activity while the conflict exists. Disclosure may also be made to both internal and third parties affected by the situation.

#### **Confidentiality and Privacy**

- You agree not to, whether during the term of your employment or after its termination, use or disclose to any person any confidential information or trade secret of SP Hunters, except insofar as it is reasonably necessary to enable you to fulfil your obligations as an employee.

#### **Whistleblower Procedure and Protection**

- Please refer the SP Hunters Whistleblower Policy.

#### **Media Contact and Public Statements**

- The Chairman and Managing Director or, in their absence their designates, are the only SP Hunters officers authorised to make public announcements on behalf of SP Hunters. You are not permitted,

unless authorised by the Managing Director, to make public statements about any aspect of SP Hunters, its operations or employees.

- Should anyone attempt to pressure you to make public statements, under no circumstances are you to make any statement and you should advise them to contact the Managing Director. In this circumstance, you should immediately advise the Managing Director of the incident.

## Breaches

Breaches of SP Hunters Policies are treated seriously with potential outcomes including disciplinary action and termination of employment.

As with any workplace there are policies and procedures that cannot be breached under any circumstances. On these occasions, summary dismissal may occur. Examples of serious misconduct include, yet are not limited to:

- Willful misconduct;
- Persistent acts of insubordination;
- Refusal of duty;
- Breach of Workplace Health and Safety Responsibilities;
- Breach of 'Duty of Care' owed to colleagues;
- Breach of privacy and confidentiality;
- Breach of Social Media Policy or Gambling Policy;
- Partaking in acts deemed as conflict of interest;
- Accepting an advantage in relation to the company's affairs or business without prior consent from management;
- Theft, attempted theft or removing of SP Hunters property without prior written authorisation;
- Abuse of SP Hunters property, causing intentional or careless damage;
- Participating in harassment, discrimination or bullying towards SP Hunters Employees, Contractors or Stakeholders;
- Proven abusive behaviour and/or language to SP Hunters Employees, Contractors or Stakeholders;
- Fighting, physical or verbal abuse;
- Intimidating or threatening others;
- Falsification of company records;
- Fraudulent behaviour;
- Possession of illegal items or publications at work;
- An intentional act and/or behaviour that brings or potentially brings the Game into disrepute.

The above list is intended to provide examples of serious misconduct only.

## Scope

The policy applies to all SP Hunters Employees, Volunteers (not including volunteers of affiliates), Contractors and Board of Directors.

This policy has been reviewed and authorised by SP Hunters Senior Leadership team and endorsed by the SP Hunters Board. Each member of the Senior Leadership team and Board has ultimate responsibility for promoting the principles and intent of this policy across their respective teams. All employees will be required to read and accept this policy upon commencement at SP Hunters.

Mr Stan Joyce

Chairman

Papua New Guinea Hunters Rugby  
Football Club Limited

Mr Jeremy Edwards

Director/Secretary

Papua New Guinea Hunters Rugby  
Football Club Limited

