

CODE OF CONDUCT



This document outlines what's expected from all team members who perform work for Endeavour Group (including contractors and directors).

1. WHO WE ARE

Our Purpose is "Creating a more sociable future together".

We achieve our Purpose by demonstrating our Values every day.

Our Values are being developed and will be communicated shortly

Nothing contained in this Code of Conduct overrides any relevant laws, regulations, awards or enterprise agreements, or applicable licence or permit conditions.

2. HOW WE ACT

2.1. Safety, Health & Wellbeing

Everyone who works for us, visits or stays with us deserves to go home safely.

To ensure your safety, health and wellbeing, you have our support to:

- Immediately stop any job or task that you believe is unsafe;
- Always address hazards as you become aware of them;
- Only use equipment that you are trained and authorised to use;
- Always wear Personal Protective Equipment (PPE) required for the task;
- Follow any safety and health processes including rules, policies and procedures;
- Report any incidents and injuries immediately.

No task or service requirement is so urgent that you cannot take the time to do it properly and safely. All team members have an obligation to work safely and follow a Leader's direction on all safety matters.

We also believe that psychological safety is as important as physical safety. It is OK to not feel OK and we implore you to ask for help or accept it if offered by a concerned team member. See the list of support contacts available at the end of our Code of Conduct.

For more information please see the [Health & Safety Policy](#) and the [Drugs, Alcohol & Alcohol Tasting Policy](#).

2.2 Respectful Workplace

Everyone who works for us is to be treated with respect. This means that the following behaviour is unacceptable:

Bullying - repeated unreasonable behaviour towards another person or group of people that poses a risk to their physical or psychological safety.

Harassment (including sexual harassment) - any unwanted behaviour that might humiliate, offend, embarrass or intimidate another person.

Unlawful Discrimination - treating someone less favourably (e.g. limiting access to training, benefits, promotion or ongoing employment) because of a protected attribute.

Violence in the workplace - This can include: punching, pushing, fighting or other physical violence, threats of violence to team members, customers and partners – as well as any of their family or friends.

Victimisation - treating someone negatively because they have made or been involved in a complaint.

If you see any of the above behaviours, please let someone know. Your options include:

- Speaking to your Leader and/or one up Leader;
- Speaking to the person in question, if you feel comfortable and safe doing so (sometimes it is a matter of just educating or making someone aware of what is acceptable);
- Speaking to your People Partner;
- Contacting People Services (Call 1800 008 584);
- For serious or confidential matters that require third party management, we encourage you to contact the Whistleblowing Service (see www.endeavourwhistleblowing.deloitte.com.au or call 1800 952 910).

For more information please see the [Respectful Workplace Policy](#).

2.3 Social Media

Is to be used effectively, appropriately and at the right time.

Social media content exists indefinitely, and can be seen and shared beyond those intended. When using social media, you should:

- Treat everyone with dignity, courtesy and respect even if they have made negative, inflammatory or untrue comments about you or Endeavour Group;
- Not make insulting, demeaning, threatening, sexual or discriminatory comments to or about someone (even if that person is not mentioned by name);
- Not send sexual or offensive pictures or videos;
- Not disclose personal information about other team members or customers; or

- Not share or post anything that is inconsistent with our Respectful Workplace Policy or any other policy or procedure.

Protect our confidential information. Confidential information is internal information that is not readily available to the public. This might include information about team members, customers, strategy, business plans, internal events, profit information, sales results or upcoming promotions.

Advocate for Endeavour Group and our businesses. Promoting our business is encouraged. However you shouldn't talk negatively about Endeavour Group, or share, comment on or "like" anything that might damage the reputation, brand or commercial interests of Endeavour Group. If you list your place of work as Endeavour Group or any of our businesses, people will see you as a face of our business.

We are honest and transparent. If you are talking about Endeavour Group or related topics or retail or hospitality in general, you should make it clear that whilst you work for Endeavour Group, that the views being expressed are yours alone (not Endeavour Group's). If you are unsure about the appropriateness of a post - don't post. If you are able to post on behalf of Endeavour Group or our businesses you will have been granted permission as part of your role.

In addition, Endeavour Group is a signatory of the Alcohol Beverages Advertising Code (ABAC) and all alcohol-related content must comply with the ABAC Code. Alcohol-related content means any content that involves or relates to alcohol products, or any of our Endeavour Group businesses. It includes all advertising and marketing content, point of sale materials, our websites and any content on social media. Please see the [Alcohol Beverages Advertising Code \(ABAC\) - ABAC Guidelines for Social Media](#) for more information.

During work hours the use of social media should not impact your ability to do your job. Generally, social media should only be used during breaks, unless it is being used for work purposes (for example, finding a social promotion for a customer).

2.4 Media, Political or External Interests

Many parties have an interest in our business.

Endeavour Group is a well-known organisation operating in the liquor retail and hospitality industries, therefore we will attract attention and interest from the media, political or other external parties. To ensure that we do not inadvertently risk our reputation, it is important that you:

- Act in accordance with our Values;
- Refer any media requests to our External Communications team (media@edg.com.au) if requested for information, an interview or comment. You are not to make a media comment without appropriate approval;

- Comply with the [External Speaking Engagement Guidelines](#) including seeking advice from the External Communications team before accepting an invitation to speak at an external event;
- Refer any government contact to the Corporate Affairs/Government Relations team;
- Do not reference negatively Endeavour Group in any social, online or other public forum; and
- Adhere to relevant laws and our [Fraud, Anti-Bribery and Corruption Policy](#) in relation to any gifts, payments, contributions or other support to government/public officials or political organisations.

2.5 Conflicts of Interest

We are expected to act in the interests of Endeavour Group, not our own and perceived or actual conflicts should be avoided.

Conflicts of interest can be personal interests, relationships or activities that may influence you to act in a way that is not in Endeavour Group's interests. If you think you may have a potential conflict of interest (or perceived), you must disclose the interest to your Leader. Team members must make a conflict of interest declaration.

See the [Conflicts of Interest Policy](#) for further information.

2.6 Onsite Conduct (when working, on breaks and outside of work hours)

We are always visible and accountable to our customers, fellow team members and external parties so our conduct must always be appropriate.

It is expected that every team member who performs work for Endeavour Group acts honestly and with integrity.

2.6 (a) Clocking In and Out of Shifts / Scanning / Attendance Record

Where you are rostered via a time and attendance system, you are required to clock in and out for every shift. Where the time and attendance system permits, all team members are required to clock in and out for breaks. Clocking in and out ensures we have accurate records of team members onsite at any given time and that team members have their hours worked accounted for and are paid correctly. If a time and attendance system isn't available, hours worked should be recorded via a manual timesheet.

2.6 (b) Responsible Gaming

No team member is permitted to gamble, wager or bet at the venue where they are employed regardless of whether they are rostered to work or not. This includes asking someone to gamble, wager or bet on your behalf. This includes gaming machines, Keno, Lucky Ticket Machines and TAB. This extends to misusing or conducting personal related transactions on rewards/loyalty/membership programs such as Monty's.

Underage persons are not permitted in gaming areas and if an underage person is observed in a restricted area, team members must take appropriate action (contact a Leader / security etc) to ensure they are removed from the area and report as necessary to the Venue Manager.

No team member is to offer or accept an IOU from a patron or another team member under any circumstances.

All team members, as far as it applies to their role and responsibilities, must ensure compliance with the [ALH Responsible Service of Alcohol & Gambling & Anti-Money Laundering Policy](#) at all times.

2.6 (c) Alcohol Consumption on Work Premises and Responsible Service of Alcohol

Our Purpose is to create a more sociable future together. To live our Purpose, Endeavour Group sets the bar by embracing the responsible service of alcohol in all of our workplaces. Endeavour Group is firmly opposed to any team member performing work whilst under the influence of alcohol or consuming alcohol. It is expected that team members will not consume alcohol immediately prior to working, whilst working or during breaks. If team members or visitors consume alcohol at work functions, they must do so responsibly and follow relevant Endeavour Group policies and procedures including our Code of Conduct.

Conducting alcohol tastings is a great way to increase our team members' knowledge of the products we serve or sell and to improve a team member's ability to provide recommendations and deliver exceptional service to our customers. We do however have clear guidelines around how to conduct a tasting. When a team member is working, tastings are limited to sipping, then spitting out any alcohol as alcohol cannot be consumed during working hours.

Underage persons (as dictated by liquor laws) are never to be served or sold alcohol either directly or through secondary supply. Team members must report the presence of underage persons who are unsupervised or in a restricted area to the Manager / Leader on duty and act quickly to ensure they have parental / guardian supervision or are removed.

The presence of intoxicated or disorderly persons should be reported immediately or as soon as practicable to the Manager/ Leader on duty to ensure appropriate action is taken. Even if in doubt of whether the person is intoxicated, a Manager / Leader should be contacted. Service or sale of alcohol must be refused by any team member where they reasonably believe a person is intoxicated or behaving in a disorderly manner.

All team members, as far as it applies to their role and responsibilities, must ensure compliance with Endeavour Group policies and procedures relating to the Responsible

Service of Alcohol and the [ALH Responsible Service of Alcohol & Gambling & Anti-Money Laundering Policy at all times.](#)

See the [Drugs, Alcohol and Alcohol Tasting Policy](#) for more information.

2.6 (d) Drugs and medication

No team member should present for work under the influence of non-prescribed drugs or misused prescription medication/drugs.

See the [Drugs, Alcohol and Alcohol Tasting Policy](#) for more information.

2.6 (e) Anti-Money Laundering

Endeavour Group ensures that venues are operated pursuant to various anti-money laundering regulations all of which impose regulations and conditions on the operations of our business. All team members, as far as it applies to their role and responsibilities, must ensure compliance with the ALH Responsible Service of Alcohol & Gambling & Anti-Money Laundering Policy at all times and report through to their Manager / Leader any non-compliance, or suspect or suspicious transactions.

2.6 (f) Team Member Purchases

Team members are not permitted to serve themselves for any purchase. All purchases must be made and paid for immediately through a point of sale terminal.

2.6 (g) Smoking (including Electronic Cigarettes)

Smoking is not permitted in any back dock, back of house or on-site areas in any venue or retail premise. If a team member is smoking and there is a designated smoking area assigned for team members, that location should be used. Where a designated smoking area doesn't exist, a team member should move at least 5 metres from a building entrance or exit and not impede foot traffic to the site. Team members must adhere to relevant State or Territory based legislation relating to all restrictions placed on smoking in public places.

2.6 (h) Consumption of food and drinks on site

All team members should take their meal breaks (even if in single team member locations this means closing the site), and eat in designated areas. Where practical, these areas are not to be visible to customers. Other than water, drinks should not be consumed when working on a register or front of house or trading areas.

2.6 (i) Fighting / Abusive or Unacceptable Language

In a respectful workplace, no language that could be regarded as abusive or unacceptable should be used. Fighting or any other form of violence from team members, customers or patrons is not acceptable. Violence or the threat of violence could result in disciplinary action, up to and including termination of employment or engagement. Team members should notify their Leader, Security or the Police if they have witnessed or experienced violence.

2.6 (j) Using Venue facilities while not on duty

Team members attending a venue, which is also their primary workplace, for family or social gatherings when not rostered on, must have approval from the Venue Manager. Acceptable behaviour must be maintained at all times.

3. HOW WE DO BUSINESS

We are committed to acting fairly and honestly in all dealings with our partners, our customers and our communities. We make sure to protect property, technology and information.

This means:

- Carrying out duties in good faith, and always following relevant laws, policies and procedures;
- Completing role specific training and raising any concerns with your Leader;
- Not engaging in behaviour or ignoring the behaviour of others that breaches our Code of Conduct; and
- Raising issues or suspected breaches with your Leader.

Treating customers fairly and with respect by:

- Listening to and valuing customer feedback;
- Addressing customer concerns regarding products that are faulty, unfit or mislabelled and poor service; and
- Ensuring our marketing, promotional information, product packaging and labelling is legal, clear, truthful and always carefully checked and not misrepresented or tampered with in any way.

Treating product and food safety as paramount by:

- Ensuring that the products we supply meet regulatory requirements, including with regard to safety warnings and labelling;
- Taking accountability for your part in the delivery and quality of products; and
- Treating product recalls as a priority, being thorough in preventing the sale or service of recalled products, and informing our customers of a recall in a timely way.

Buying goods and services fairly and responsibly. This means:

- Obtaining the best value for money, but never unethically or unfairly;
- Rejecting, and never asking for, any form of inducement or bribe in return for business;
- Not placing undue and inappropriate pressure on our partners;
- Complying with all relevant Regulatory Standards;
- Regularly reviewing our contractual arrangements with partners; and
- Ensuring that our buying and procurement processes are transparent and in line with Fair Trading laws.

As a business we comply with competition laws by trading independently and ensuring that our prices for products and services are compelling and competitive for customers.

3.1 Endeavour Group Property, Cash, Stock and Assets

We are responsible for property that belongs to Endeavour Group and to care for it properly.

In your role you may be given access to things that belong to Endeavour Group such as:

Cash, Equipment, Products and Merchandise, Computers, Mobile Phones, Tablets and passwords, Motor Vehicles, Buildings and Sites, Confidential Information and Intellectual Property.

You should always handle stock, equipment and other property with care, and remember to:

- Ensure every sale is processed immediately through the point of sale in the correct way;
- Assume that damaged or expired stock is wanted and valuable to Endeavour Group;
- Never take or lend stock or property, no matter how small or inexpensive;
- Where appropriate, seek permission from a Leader to take property from the workplace and ensure its removal is documented;
- Use property and business tools for their intended use and not for personal use unless authorised;
- Return property of Endeavour Group, including hard and electronic copies of documents, when you stop working with or for Endeavour Group;
- Never offer or accept an IOU from a patron or another team member under any circumstances;
- Not allow for any discount or refunds, except as authorised by a Leader and immediately record authorised documentation;
- Where a team member has complete control of cash, the team member is responsible for the cash until handed over to the Leader or supervisor on duty.

If you believe theft or damage to property is happening in your workplace, report it immediately to your Leader or one up Leader, or via the Whistleblowing Service if the matter requires third party management.

To protect our customers, team members and sites, Closed Circuit Television (CCTV) video surveillance equipment operates at our sites. CCTV cameras are installed in Endeavour Group properties, except in bathroom areas, change rooms and lockers rooms. To the extent permitted by law, CCTV footage may be used when investigating complaints of possible misconduct and must not be tampered with.

3.2 Gifts and Entertainment

To ensure honesty and integrity and no bias, we do not accept gifts. Entertainment is accepted with clear limits.

Gifts and Entertainment include physical products, partner-paid trips, tickets to sporting or entertainment events, and other personal favours. Thank you gestures such as tips, a bunch of flowers or a box of chocolates are not considered as gifts in this context.

If you are offered a gift, you must:

- Decline the gift; or
- If declining is not possible or inappropriate, the gift can be accepted, logged in the Gifts and Entertainment Register and used for charity or raffle prizes.

If you are offered entertainment:

- Accept the entertainment if the commercial value does not exceed AU/NZ \$150 per person; or
- If the value exceeds AU/NZ \$150 per person and you want to accept the entertainment, it must be logged in the Gifts and Entertainment Register and your Leader notified (exceptions apply for partner award dinners).

Refer to the [Gifts & Entertainment Policy](#) for full details.

3.3 Using information technology

All team members have a role to play in protecting Endeavour Group's information, including customer information. We must also act to protect all technology and information systems within Endeavour Group.

To keep our systems safe:

- team members are provided with unique accounts with passwords, which should not be shared with others
- information sent, received or stored on Endeavour Group systems (including email, internet and intranet) may be monitored
- if you receive or think you have received a suspicious email, do not respond or click on any links - instead forward the email to hoax@edg.com.au or hoax@alhgroup.com.au
- To contact the IT Tech and Service Centre, dial 1800 222 560. If calling from overseas dial +61 2 9333 8220.

3.4 Privacy & Personal Information

To help us remain competitive, and to keep the information safe that people trust us with, team members should not share Endeavour Group information with any person who is not authorised to see that information. This applies both during and after employment or engagement with Endeavour Group.

As part of your role you may be trusted with documents and information that belong to Endeavour Group, our customers, team members and partners.

Any personal information collected from team members, customers or partners will be done so in accordance with relevant privacy legislation and Endeavour Group policies and procedures and we will:

- Only use it for the reason it was given to Endeavour Group and as agreed/ consented to;
- Not share outside of Endeavour Group without the owner's permission; and
- treat all information in accordance with relevant privacy laws.

Refer to the [Privacy Policy](#) for full details.

3.5 Endeavour Group Confidential Information

Information about Endeavour Group and our operations, strategies, finances, customers and team – or anything else that is not publicly known – must be kept confidential and not disclosed to anyone outside Endeavour Group, including on social media or if speaking at events. If you are due to speak at an event, be sure to let your Team Leader know what information you'll be sharing.

3.6 Trading in Endeavour Group & other companies' shares

As a team member, you may become aware of confidential information that could affect the Endeavour Group share price, or the share price of another company.

This confidential, price-sensitive information should never be used or shared for personal gain. In addition to being a breach of our policies, this may also be against the law.

Our aim is to protect team members from inadvertently trading shares when confidential, price-sensitive information is known within Endeavour Group. You must not buy or sell Endeavour Group shares if you are in possession of confidential price sensitive information or in circumstances where it could be perceived by the market that you are taking advantage of your role at Endeavour Group. There are additional obligations on team members who are regularly in possession of confidential, price-sensitive information where you can only buy or sell in specified windows and you must seek clearance before doing so.

From time to time, you may also be asked not to buy or sell shares in other companies. Depending on your role, you may not be able to buy shares in Woolworths Group Limited and/or Endeavour Group if you are aware of confidential information. Buyers must not buy or sell shares in a partner they are overseeing.

3.7 Record keeping

We're committed to operating responsibly and in accordance with legislation and accounting principles.

This means that:

- we need to make sure our financial records, people records and systems are accurate
- all of our financial transactions and funds need to be recorded correctly and supported by proper paperwork so they can be audited reliably and reported honestly
- falsifying Endeavour Group documents, or any information given to external parties including the government or regulators, is unacceptable
- no team member should deliberately keep or help another team member to keep records that intentionally mislead or hide the true nature of a transaction
- all Endeavour Group funds, transactions and bank accounts must be reflected in Endeavour Group books. No 'off book' transactions can be made

3.8 Dress Standards

Team members are expected to dress appropriately during work hours or when representing Endeavour Group.

Our dress standards include:

- following preferred dress guidelines within particular brands or as stipulated in an Award or Enterprise Agreement
- wearing attire appropriate to the work setting. It's always okay to wear cultural and religious garments, and you may wear clothing of the gender with which you identify
- wearing appropriate protective or safety clothing when required
- wearing appropriate footwear in offices at all times, and enclosed footwear if working at or visiting any retail / venue site
- being clean, tidy and maintaining personal hygiene and grooming
- wearing a name badge or identity card when on work premises
- wearing only Endeavour Group authorised business logos, promotional garments or accessories, e.g. caps, if you are in a customer-facing role
- keeping jewellery to an acceptable business level standard. Additional department specific requirements may also apply, for example when working in a food preparation area

3.9 Grievances and Resolving Disputes

Should a team member have any grievances or disputes with respect to their employment or engagement, treatment, the action of another Endeavour Group team member or customer or patron or compliance with this Code of Conduct or other Endeavour Group policies or procedures, then they should raise them by initially approaching their Leader with a description of the grievance or dispute, and attempt to amicably and professionally resolve the matter.

If the grievance or dispute is not settled in this way, or if it is inappropriate to be raised with a team member's Leader, then the matter should be raised with a Senior Leader,

People Partner, People Services, or via the Whistleblowing Service if the matter requires third party management, or involve other representatives as per the relevant Award or Enterprise Agreement, Employment Agreement or Endeavour Group policies and procedures.

Team members who have genuine suspicions of wrongdoing by other team members or Endeavour Group management will be provided a safe environment in which to voice their concerns without fear, reprisal or victimisation.

3.10 Expectations and disciplinary action

At Endeavour Group, we aim to set clear expectations for our team members in terms of conduct, behaviour and performance. Team members are required to comply with our Code of Conduct and all other Endeavour Group policies and procedures at all times. If a team member is found to be in breach of our Code of Conduct or any other policy or procedure, they may be subject to disciplinary action.

Examples of disciplinary action which may be taken by Endeavour Group include, but are not limited to, the following:

- training;
- informal counselling;
- verbal warning;
- written warning;
- final written warning; and
- termination of employment or engagement, including summary termination in circumstances of serious or wilful misconduct.

4. QUESTIONS & HELP

If you have any questions, or need help with anything, we encourage you to raise them as soon as practicable. We're all here to help each other. Always feel free to ask questions, provide feedback and importantly, raise a concern if you feel something isn't quite right.

Your Leader

Your first point of call for any queries, advice or support.

One Up Leader

If you are not able to speak with your Leader, you can escalate to a one up Leader for assistance.

People Services

For people matters, including understanding your pay and benefits and resolving workplace issues.

Get help from the [Endeavour Group People Portal](#)

Call 1800 008 584 (option 5)

People Partner

For more sensitive or complex people queries or support.

Whistleblowing

Where you identify a serious matter that doesn't seem right, for example a potential breach of the law or our policies, including suspected fraud or corruption, or need to raise an issue anonymously or confidentially, contact the Whistleblowing Service.

Call 1800 952 910

For more details on how to report, please go to:

www.endeavourwhistleblowing.deloitte.com.au

Endeavour Group People Portal

For people policies, procedures, processes and guidance material.

Go to [Endeavour Group People Portal](#)

Your Enterprise Agreement or Modern Award

For more information about your entitlements and responsibilities. On the [Endeavour Group People Portal](#) or in your team room.

Document changes	This document may be changed at any time, and does not form part of any team member's contract of employment or engagement. Version 1
Document Owner	Chief People Officer
Effective Date	28 June 2021
Next Review Date	1 July 2023