



M.A.T.E.S
Material for Advancement in
Training for Excellence in Sales

**TOYMATE
CODE OF CONDUCT**

OVERVIEW

Dear Toymate Team Members

The foundation of our great business always needs to be our commitment to doing business the right way. This means we are all accountable and must always act with the highest ethical standards and respect when dealing with our customers, suppliers, contractors, and each other. It is your responsibility to be familiar with the Toymate Code of Conduct and to follow the principles and guidelines set out in our Code.

Compliance with our Code is an expectation of every team member to ensure we can all work in an environment that is high performing, enjoyable and safe. The Toymate Code assists every one of us to make the right ethical and legal decisions as we perform our daily responsibility for Toymate.

Working together as a team, being respectful, ethical, and accountable will help us build sustainable growth and create value for all of us and our customers. Your commitment to Toymate and our Code of Conduct is greatly appreciated, and Toymate Management wish you every success.

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Document #: POL003	Version #: 1	Issue Date: 11/7/2020	Revision Date: 11/7/2021
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CODE OF CONDUCT





1. PURPOSE

- 1.1 This Policy outlines the Code of Conduct for all Toymate's ('TOYMATE') employees' with regards to acceptable behaviour, guidelines and principles.
- 1.2 This Policy, where relevant, operates in conjunction with an employee's contract of employment.

2. COMMENCEMENT OF THE POLICY

- 2.1 This Policy will commence from 11/7/2020. It replaces all other leave policies of Toymate ('Toymate') which deal relating to Code of Conduct.

3. APPLICATION OF THE POLICY

- 3.1 This Policy applies to employees (including temporary employees) of Toymate who are employed by Toymate.
- 3.2 This Policy does not form part of any employee's contract of employment. The Policy is not intended to override the terms of any award, enterprise agreement or contract that applies to an employee.



4. TOYMATE CODE OF CONDUCT

4.1 This Code outlines the standards of conduct expected of all Toymate team members when dealing with each other, customers, suppliers, contractors, and anyone we interact with in our business.

<p>Everyone</p> <p>At work and work-related social situations, or any situation in which you are representing Toymate:</p> <ul style="list-style-type: none"> • Embrace and act in accordance with our Code of Conduct. • Make truthful statements, promises or commitments that you can meet. • Act in an ethical, honest, professional, and lawful manner and be accountable for your actions and decisions. Treat others as you wish to be treated and trust, support and respect our fellow team members. • Fulfil your contract of employment and undertake your duties and exercise any power given to you faithfully with care and diligence. • Comply with all lawful directions by Toymate and conduct yourself appropriately and in a lawful manner with all persons with which Toymate conducts business. • Comply with any Toymate policy that sets standards higher than those required by law. • Learn about and comply with Toymate policies and procedures, and all relevant laws. • Perform your duties in a manner that minimises negative environmental, social and community impacts and maximises workplace safety. • Role model and share your knowledge about this Code with other team members. • Raise situations you think could be in breach of the Code with your line manager and or Head of Operations. • Encourage others to raise concerns. • Keep the Code accessible for ongoing reference. 	<p>Leaders</p> <p>In addition to your individual responsibilities, as Managers, you are also required to:</p> <ul style="list-style-type: none"> • Lead by example. • Comply with this Code, Company policies and all laws that apply in your area of responsibility. • Contribute to our good reputation and continue to gain and build on the respect of the communities and environments in which we operate. • Exercise fairness, courtesy, respect, consideration, and sensitivity in all dealings within the workplace and with customers, suppliers, and the public generally. • Build team members' knowledge of and compliance with this Code, Company policies and all relevant laws. • Provide an environment where team members can raise their concerns and discuss them openly without fearing or experiencing negative consequences. • Manage behaviour that is inconsistent with this Code. • Lead and manage team members in accordance with our Values. 
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5. GETTING ADVICE

- 5.1 Your line manager is your most direct source of information and assistance. In addition to your individual responsibility to learn about Toymate policies, your line manager will be able to assist you to access any specific Toymate policies you may wish to view. Specific policies provide detailed explanations of Toymate standards across a range of areas and can be found in the Toymate Policy and Procedure folder or electronic version at your store and Head Office. Your line manager will be able to clarify how this Code applies to you in a specific situation or direct you to someone who can assist such as your Area Manager, Head of Operations or Loss Prevention Manager.



6. DIVERSITY AND EQUAL OPPORTUNITY

- 6.1 Toymate is committed to diversity and equal opportunity.
- 6.2 Staff are expected to follow the following principles

- recognise and appreciate the value of our differences, internally amongst team members and externally amongst customers, suppliers, contractors, and anyone we interact with in our work with Toymate. Toymate will not accept harassment, sexual harassment, discrimination, bullying or any other inappropriate workplace behaviour.
- Treat everyone that I interact with in the course of my employment with dignity, courtesy, and respect.
- Contribute positively to an environment where team members and others I interact with can work and customers can shop without the distress or interference caused by harassment, sexual harassment, discrimination, or bullying.
- Not unlawfully discriminate against people in the provision of our goods and services, and in all aspects of employment including recruitment, training, promotion, remuneration and benefits and termination of employment on prohibited grounds (such as age, gender, race, disability, religion, etc).
- Not make any disparaging or untruthful remarks about other team members, customers, competitors, contractors, or suppliers. The above requirements also extend to your behaviour and activity which may occur on any social media and online forums.



7. FAIR TRADING AND ANTI-BRIBERY

7.1 Toymate will provide customers with the confidence that we will always be open, honest, and trustworthy in all our dealings with them.

7.2 Staff are expected to follow the following principles

- Deal openly, honestly, and fairly with customers.
- Follow safety and product information standards and action product withdrawals and recalls.
- Honour customers' rights to a refund or exchange and in accordance with company Policy's. Toymate will work with suppliers of goods and services in a constructive, lawful and fair manner, which abides by Toymate' s policies.
- Ensure third party relationships are based on price, quality, service, and reputation.
- Deal fairly and honestly with suppliers and not use undue pressure, coercion, or unfair tactics.
- Not 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, 'kick-backs', secret commissions, facilitation payments or other unlawful (or in breach of Toymate policies) payments.
- Not make any political donations for or on behalf of Toymate.
- Not make any charitable donation for or on behalf of Toymate, without the proper prior approval.
- Report any known or suspected activity involving any form of bribery or conflict of interest.
- Maintain accurate books and records and never engage in fraud.
- Take all practical steps to ensure that agents, contractors, intermediaries, or business associates do not engage in conduct on behalf of Toymate that would contravene this Code. Toymate will interact with competitors in a fair and reasonable manner.
- Deal fairly with competitors and not influence or restrict their dealings.
- Not enter into any discussions or agreements with competitors regarding prices, discounts, or sales.
- Not misuse our position to restrict competition in the marketplace.
- Comply with and promote all relevant competition and consumer laws.



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8. HEALTH AND SAFETY

- 8.1 Toymate will provide a working and shopping environment where team members and customers are safe.
- 8.2 Toymate will not accept behaviour that puts at risk the safety of team members, customers, suppliers, contractors, or anyone we interact with in our work with Toymate. This includes physical and psychological violence or harm, or threats of violence or harm:
- 8.3 Staff are expected to follow the following health and safety guidelines, principles and best practice:
 - Behave in a way that ensures my safety and the safety of others.
 - I will not put the safety of others or myself at risk.
 - Follow all safety requirements.
 - Attend fit for work, not under the influence of alcohol or other drugs/substances.
 - Not possess or traffic illegal drugs or weapons at work.
 - Not smoke on Company premises except in designated areas.
 - Maintain personal presentation standards.
 - Immediately report any team member putting themselves, other team members or anyone in the workplace at risk of harm or injury.
 - Immediately and accurately report to a manager any injury I am involved in during your employment with Toymate.



9. CONFLICT OF INTEREST

- 9.1 Situations can sometimes arise where a team member has interests which conflict with those of Toymate. For example, a conflict of interest exists where a team member makes a Toymate business decision, or influences a decision (of a



supplier, customer, contractor, another team member), that provides a personal benefit to themselves or a related third party such as a partner, relative, business or associate.

9.2 Toymate recognises there is potential for a conflict of interest in a range of situations involving team members, customers, suppliers, contractors, and other parties, and will work with team members to resolve potential or actual conflicts of interest.

9.3 Staff are expected to adhere to the following:

- Declare any actual or potential conflict of interest to the Head of Operations.
- Ensure that personal interests will not conflict with my duties and obligations to Toymate.
- Ensure other employment does not impair my ability to perform my role for Toymate.
- Not accept gifts from customers, agents, contractors, or suppliers or any third party with whom we have business dealings or might have business dealings.
- Only accept entertainment where it is an essential part of doing business, an existing business relationship exists, and the head of operations has approved it.
- Never request any invitation for entertainment or hospitality and never accept any form of complimentary travel or accommodation from a third party with which Toymate has business dealings or potential business dealings.
- Only purchase merchandise direct from suppliers when it is an approved business requirement.
- Not offer or accept a bribe or engage in fraud.

10. CONFIDENTIALITY OF INFORMATION

10.1 Information is considered confidential when it is not readily available to the public. Most of the information used throughout Toymate is confidential. If you are in doubt, treat information as confidential.

10.2 **Toymate will not accept the unauthorised disclosure of confidential information. An example of a breach of this code would be where a Toymate employee gives a non Toymate employee or ex Toymate employee information and or dealings regarding the business via email, phone, social media, or any other means. The breach of this code is considered and theft of sensitive information and is viewed as serious and would result in termination of employment and the commencement of Legal Proceedings against the employee and person receiving the information.**

10.3 Staff are expected to adhere to the following principles relating to confidential information:

- Keep all Toymate information confidential except where disclosure is authorised or required by law.

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- Use only my own systems log-on ID and password, and not provide them to another user.
- Use confidential information solely for authorised purposes and I will not use it inappropriately to gain an advantage for myself or someone else, or to cause detriment to Toymate.
- Refer requests for information from the media, government, community, bloggers, or analysts to the Head of Operations
- Not use, at any time, the internet or on-line social media forums to make statements or comments or to post material that might damage Toymate's reputation or interest, or the reputation or interests of team members, customers, suppliers, contractors, competitors, or any person Toymate has business dealings with.
- Not publish, at any time, any Toymate confidential information to any internet or on-line social media site.
- Not post derogatory, offensive, inappropriate, hateful or threatening comments or material about a team member, customer or any person with whom Toymate has business dealings, such as contractors and suppliers including where such comments or materials constitute bullying, harassment or discrimination of that person.



11. PRIVACY

- 11.1 Toymate is committed to ensuring the privacy of individuals and safeguarding the personal information provided by team members, potential team members, customers, suppliers, contractors, and anyone else we interact with in our work with Toymate. The business will not accept collection, use, or disclose information for anything other than the purpose for which it is required.
- 11.2 Staff are expected to adhere to the following regarding privacy:
- Respect the privacy of individuals.
 - Respect information I have or know about team members, customers, suppliers, contractors, and anyone else I interact with in my work with Toymate.
 - Collect, retain, and disclose information appropriately and lawfully.

12. COMPANY RESOURCES

- 12.1 Toymate will not accept deliberate or reckless damage to, or the theft or misuse of its resources, or the resources of others who we interact with in our work with Toymate.
- 12.2 Resources include stock, money, equipment, stationery, files, data, records, computer hardware and software, intellectual property and Company work time.
- 12.3 Staff are expected to adhere to the following guidelines regarding Company Resources:
- Use Toymate business resources for the purpose intended and not use these resources for personal or a third-party gain, to release confidential information or transmit illegal, objectionable, or offensive material.



- Only dispose of any resources, if approved and accurately recorded.
- Abide by copyright and trademark laws, including Company logos and never publish, or cause to be published, the Company logo or trademarks of any social media site, the internet or otherwise without Toymate's express authorisation.
- Maintain accurate business records, including work attendance, merchandise and accounting, financial and expenditure records, and business dealings, and not falsify such records or cause such records to be inaccurate or falsified.
- Only enter into agreements with external parties to the extent that I have the authority and approval to do so.
- Return all Toymate property and any Toymate confidential information in your possession upon cessation of employment with Toymate.
- Use my team member discount privileges in accordance with their terms of use.
- Only obtain or affect any discount on products to an authorised amount.
- Place stock on hold and not to purchase it at a lower price on a later date.
- Process markdowns correctly and not take or give unauthorised markdowns.
- Pay for Company stock or assets before consuming them or leaving the workplace with them.
- Not return stock and receive a greater refund than the amount I originally paid for the stock.
- Not remove displays, bonus stock or samples from the workplace without authorisation.
- Process transactions, including discounts and loyalty correctly.
- Not process my own transactions, or transactions for friends or family.
- Immediately report any team member breaching or suspected of breaching the code of conduct.

13. BREACHING CODE OF CONDUCT

13.1 Toymate treats breaches of this Code seriously. If you breach this Code, or assist someone else to breach the Code, the breach will be investigated. If it is determined that a breach has occurred, Toymate will address the behaviour in line with the circumstances of the individual case. This could include formal discussions with a team member or disciplinary action, which ranges from a warning to termination of employment without notice. There are some breaches of this Code that Toymate considers serious misconduct and will not tolerate. Serious breaches are likely to result in termination of employment. Some examples are:

- Serious harassment, sexual harassment, discrimination, or bullying.
- Serious safety breaches, including physical or psychological violence or threats of violence.
- Misleading or defrauding Toymate.
- Theft from Toymate
- Actions resulting in serious damage of Toymate property.
- A serious breach of Toymate policies and procedures or the law.
- Consuming or trafficking illegal drugs or weapons.

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- Attending work under the influence of alcohol or other illegal drugs.

14. REPORTING A BREACH

- 14.1 If you genuinely believe that there has been a breach of this Code, we want you to raise your concerns. Team members who are concerned about conduct should raise their concerns with a manager. If the breach involves your line manager, raise it with their line manager, or the head of operations or Loss Prevention.
- 14.2 **Sometimes there may be exceptional circumstances when a team member wants to make a report but remain anonymous. The Toymate Lets Be Honest hotline and email is another channel available to employees wishing to make a report. letsbehonest@toymate.com.au Ph: 0452441469.**



Your Agreement to our Code of Conduct

I have received, read and understood Toymate’s Code of Conduct.
I acknowledge and understand that I am required to comply with Toymate’s Code of Conduct at all times during my employment with Toymate.
I also acknowledge that this requirement extends to any Toymate function or activity (or function or activity I am attending as a Toymate team member), which is held during or after normal working hours.
I also understand that if I breach the Code of Conduct in any way, that this may result in disciplinary action up to and including the termination of my employment.

Name: _____
Team Member Number: _____
Signature: _____
Position: _____
Date: _____
Store number or location: _____
Office use only: This page must be filed in the team member’s personal file.



