

Hamilton Island Code of Conduct

For Employees on Hamilton Island, Dent Island and other HIE Workplaces

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Hamilton Island Enterprises Limited

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1 Introduction

This Code of Conduct sets out principles of good conduct and standards of behaviour that are expected of all Employees. This Code of Conduct forms part of the work contract and it is every Employee's responsibility to read, understand and comply with the intent of this document.

The intention of the Code of Conduct is to provide all Employees with a clear understanding of the standard of behaviour expected of all Employees and clarifies what they are required to do.

Due to the unique nature of the Island, it is necessary to set out guidelines for Employee conduct whilst they are residing and/or working on the Island. The guidelines apply to all Employees at all times during their presence on the Island. Creating a fun, enjoyable and respectful work, living and holiday environment for all of our Employees and Guests is our first priority.

Whilst some clauses may not apply to those working in locations other than Hamilton Island and Dent Island, those relating to general etiquette and conduct, grooming, media and social media certainly do apply and will be enforced.

Incidents of misconduct or breaches of any guidelines will not be tolerated and may result in formal disciplinary action, removal of right to reside on the Island or termination of an Employee's employment contract.

2 Definitions

"Code of Conduct" means this document which may vary.

"CEO" means Chief Executive Officer of HIE or his/her appointed officer.

"Employee" means any Person who works for HIE or any subsidiary or related company of HIE; any

Person who conducts an authorised business on the Island (Registered Business); any Employee of the business (Registered Business Employee); and any other Person who carries on business on the Island (Contractor) or is employed to work on the Island

(Contractor Employee)

"HIE" means Hamilton Island Enterprises Limited (ACN 009 946 909) and its successors and

assigns.

"Island" means Hamilton Island and Dent Island, including the Marina.

"Guest" means a Person, who is a visitor to the island.

"Manager" means a reference to a Manager and is a reference to the person appointed by HIE to

hold the position for the time being.

"Person" means any Person who visits the Island, for any period of time, and includes a Resident,

Employee and a Guest

"Resort Zone" means the area as defined in Section 6.5

"Registered Business" means those Persons or businesses that are authorised by HIE to carry on business on

the Island.

"Registered Business

Office"

means the office located at the building known as the Retail, Activities & Marina Office"

(RAM) Office located at Mango Tree ccorner.

"Resident" means a Person who resides on the Island temporarily or permanently or a Person who

is a subleasee or sub-subleasee

"Rules and Regulations" means the Hamilton Island Rules and Regulations.

"Vehicle" means (i) any motorised carriage used in the conveyance of persons or goods and (ii) any

trailer

3 Other Applicable Policies

The Code of Conduct is to be read in conjunction with the Rules and Regulations and all other applicable policies. Where there are inconsistencies between the Rules and Regulations and this document, the Code of Conduct overrides the Rules and Regulations.

In addition to the Code of Conduct and Rules and Regulations, Employees are also bound by any additional policies in place by their employer.

4 General Etiquette

Employees are required to maintain a high standard of etiquette while on and off duty everywhere around the Island. It is the responsibility of Employees to ensure they adhere to these guidelines.

4.1 Conduct whilst in Uniform

Whilst on duty and/or in uniform, the following needs to be adhered to by employees:

- Be aware that you are representing the Island when you are wearing your uniform, even if you are off duty.
- You must adhere to grooming and applicable uniform standards at all times.
- Where possible access your workplace through back-of-house/staff entries.
- No swearing or talking about your personal affairs in the company of Guests.
- Address all Guests by name where possible or Sir or Madam.
- Respond positively, for example, "My pleasure", "May I help you?", "I will find out for you".
- Do not respond with, "Not a problem", "No worries", "Just a sec", "Cheers" or "Yeah".
- Mobile phone should not be used walking to, from or during work unless required for your role.
- IPODS, MP3 players and headphones are not permitted.
- Food must be consumed in designated staff areas.
- Employees may visit retail outlets on Front Street while in uniform, such as the IGA, bakery and bottle shop. However Employees should have a specific purpose for being at the outlet and not loiter unnecessarily.
- Managers who are required to conduct a Guest or business meeting in a food and beverage outlet while in uniform may do so by pre-arranging it with the outlet manager.

4.2 Conduct at all times

Whether the Employee is on or off duty they must adhere to the following:

- Suitable clothing and footwear to be worn at all times.
- Allow Guests to be served first, including Guests boarding and disembarking the bus.
- All Employees must conduct themselves in an appropriate and dignified manner.
- No slandering of the Island, HIE, Guests, fellow Employees or Residents.
- Be respectful and polite to all Guests, Residents and fellow Employees.
- Harassment, bullying and discrimination will not be tolerated.
- Keep noise to a minimum when moving around the Island.

5 Grooming

As representatives of your employer and the Island, it is important for Employees to project a picture of professionalism at all times and that their attire is appropriate. Uniforms or work clothing should be clean and in good condition. Accessories, make-up, hairstyles and body art should be appropriate to the Employees' work setting. Given the Island's tropical location, heat and humidity is a factor and Employees' should practice good hygiene at all times. HIE employees should refer to the HIE Grooming Policy for further detail.

6 Resort Zone

Facilities within the Resort Zone are primarily for the use of Guests of the resort. For Employees to use the resort facilities they must obtain an On-Premise Pass ("Pass"). HIE Employees may obtain a Pass from Hispace and take it to the General Manager of their division for approval. Employees of Registered Businesses may obtain a Pass from the Registered Business Office for the General Manager RAM or his/her delegate to approve. Contractors may obtain a Pass from the Engineering & Services office for the General Manager Engineering & Services or his/her delegate to approve. Employees are required to have an acceptable reason for applying for a Pass such as friends or family staying as Guests in the Resort Zone.

As an exception, Employees are permitted to dine at Sails, Coca chu and Pool Terrace without a Pass. Employees are also able to access activities, such as mini golf, gym, bowling and retail outlets without a Pass. Other outlets, including Reef Lounge, Island Bar, Beach Club, and pools require a Pass. Employee access to activities and venues will be subject to Guest demand.

Employees are not to be within the Resort Zone after 10 pm unless they are returning from an approved venue, or in possession of a Pass.

Employees staying at the Reef View Hotel for work purposes are permitted to visit the Reef Lounge and Reef View Pool without a Pass. Employees staying at the Reef View Hotel as temporary accommodation are not permitted to go to the Reef Lounge or the Reef View Pool.

6.1 Walking through the Resort Zone

When Employees are walking through the Resort Zone it is important that they do not walk in front of Guest accommodation or pool areas. This includes:

- Palm Bungalows
- Reef View Hotel
- Whitsunday Holiday Apartments
- Hibiscus, Lagoon and Frangipani Lodges
- Beach Club
- All Pool areas

Employees must follow the roads and pathways at all times.

6.2 Use of Pools and Beaches

Employees may use the south-eastern end of Catseye Beach between sunrise and sunset, from the laneway adjacent to the Bougainvillea Marquee. Employees are not permitted to use the pool and beach chairs or lounges. Pool areas in the Resort Zone are reserved for Guests only, unless Employees have an On Premise Pass or are otherwise authorised. However, families who reside in Harbour View or East View staff accommodation, or those nominated by their General Manager are permitted to use the Bougainvillea Pool.

The Reef View swimming pool may be accessible to Employees who are training for a sporting event or competition. They must receive approval and register with the Sports Club Manager before using the pool. There are conditions associated with using this pool.

Shirts and footwear are to be worn over swimwear when moving to and from the beach/pool areas.

6.3 Conduct in the Resort Zone whilst in uniform

Be aware that you are always representing your employer when you are in uniform, even if you are off duty. Whilst in uniform Employees must adhere to the following:

- No mobile phone usage unless it is part of performing your normal role or duties.
- No smoking whilst in uniform, except in designated staff areas.
- With the exception of bottled water, no visible consumption of food or drinks.
- Demonstrate eye contact, acknowledge Guests and smile.
- Do not have personal conversations while Guests are present.
- Do not sit or lean on steps or walls in Guest areas.
- Use designated staff toilet facilities, not Guest facilities or public facilities.

6.4 Conduct at all times within the Resort Zone

Employees within the resort zone must be conscious of their behaviour at all times. Employees must:

- Wear suitable clothing and footwear at all times in the Resort Zone
- Ensure Guests always have service priority
- Be aware of your mannerisms and language when talking to Guests
- No vulgar, obscene or disrespectful language or conduct
- No public displays of affection, for example, kissing
- Conversations that could tarnish the reputation or bring any Island business into disrepute are not to be conducted under any circumstances and especially in a Guest area.

6.5 Resort Zone Map



7 Noise and Appropriate Behaviour

It is important that all Employees respect the noise and behaviour standards of the Island to ensure consideration is given towards Guests, Residents and fellow Employees. When Employees are leaving a venue or moving from one venue to another it is their responsibility to be considerate and respectful of other patrons on the Island by keeping noise to a minimum and conducting themselves appropriately.

8 Socialising with Guests

There is a standard of professionalism required by Employees towards Guests. Employees are not permitted to invite Guests to their accommodation or go to the Guests accommodation without approval from their General Manager. Employees of Registered Businesses are required to seek approval from the General Manager RAM or his/her delegate. Guests are not to attend Staff Facilities such as the Rainforest Café or R Bar without a Visitor pass being issued by Island Safety.

9 Alcohol, Drugs and Smoking

Employees may consume alcohol in recognised venues, such as restaurants, Garden Bar, R-Bar, Marina Daze and Popeye's (including the Popeye's picnic tables). No alcohol is permitted to be consumed in any other area on Front Street. Employees may consume alcohol in designated picnic areas and at BBQ facilities such as Point Henning. Employees may consume alcohol inside the bounds of staff accommodation, including the Staff Pool area. Only plastic implements may be used at the pool; no glass is permitted.

Employees are not permitted to consume alcohol in their uniforms at any venue, other than the R-Bar. Under no circumstances are Employees to stand outside a venue or move around the Island whilst consuming alcohol. Alcohol may not be consumed on any of the wharfs in the Marina, including the Ferry Terminal. Alcohol may not be consumed on Catseye Beach unless approved by a General Manager. In areas where Employees may consume alcohol, behaviour must be appropriate and any drunk or disorderly behaviour will not be tolerated.

Drugs and drug paraphernalia is prohibited under Queensland law and will not be tolerated under any circumstances.

Whilst Employees are in uniform they are permitted to smoke in designated staff smoking areas only. When off-duty and not in uniform Employees are permitted to smoke in designated smoking areas. Employees are not permitted to smoke on any of the wharfs in the Marina, including the Ferry Terminal. Smoking refers to the inhalation of smoke or vapour and includes cigarettes, cigars, pipes and E cigarettes.

10 Social Media

HIE understands and appreciates the value of social media and its growing importance. Social Media refers to the various internet-based tools that enable people to communicate and share information on-line.

When communicating on Social Media, Employees must remain aware that this information is available for global viewing. As such, when referring to the Island in any form of Social Media, Employees are responsible for acting with discretion and abiding by this Code of Conduct and policies at all times. Employees must not post material that is obscene, defamatory, threatening, harassing, discriminatory or may bring HIE into disrepute. Only authorised Employees may communicate on behalf of HIE.

11 Media

No Employee is to provide information to any media organisation or media representative, unless having previously been authorised to do so by the CEO. Employees must not respond to, tip off, email, SMS, talk to, Skype, provide film footage or photography to or act on behalf of any Island employer by taking part in an interview.

12 Privacy and Confidentiality

We will protect confidential information and will not disclose or misuse information without appropriate authorisation. Confidential information may include, but is not limited to, employee details, trade secrets, marketing information, customer lists, price lists, research and development activities, technical information, financial information, business plans, designs, drawings, techniques, processes, intellectual property and any information which is not generally publicly available. If we have access to confidential information we must not reveal such information without appropriate authorisation and it should not be used for personal gain and ensure it is protected from theft, unauthorised disclosure or inappropriate or unauthorised use.

From time to time we have high profile and well-known identities on island and you, as an employee, should ensure their privacy and respect their right to confidentiality.

13 Vehicle Use, Parking and Access

The following outlines the Vehicle use, parking and access regulations and standard of behaviour for driving a Vehicle on or off duty. All Queensland road rules including L and P plate restrictions apply. Interstate Driver's Licence holders must transfer their licence to Queensland within 3 months of arrival. International Driver's Licence holders on a permanent residency visa must transfer to a Queensland licence within three months of arrival or within three months of obtaining a residency visa. International Driver Licence holders on a temporary visa may drive in Queensland provided they hold a valid International Driver's Licence, even though that might exceed the three month period. The Licence document must be written in, or translated to, English.

Maps detailing restricted areas for Commercial Vehicles and designated parking areas are located Appendix A and B.

13.1 Vehicle Types

A **"2/4 Seat Buggy"** is a buggy of standard chassis length with seats and without a tray-back, and includes a "Special Approval Buggy".

A "Commercial Vehicle" is any Vehicle that is not a 2/4 Seat Buggy.

A "Special Approval Buggy" is a buggy approval granted to an Employee by the CEO. All conditions applying to 2/4 Seat Buggies also apply to Special Approval Buggies.

13.2 General Rules

In addition to the Vehicle Use, Parking and Access rules contained in the Rules and Regulations, Employees must abide by the following:

- No smoking whilst travelling in Vehicles or buggies.
- Vulgar behaviour or yelling out of the Vehicle is not permitted.
- There is to be no consumption of alcohol (including passengers) whilst travelling in buggies and Vehicles.
- No mobile phones, IPODS, MP3 players or headphones are to be used whilst driving a Vehicle.
- Vehicles are to be kept in a clean and presentable condition at all times.

13.3 2/4 Seat Buggies

May access and traverse all Guest areas, but must park away from Guest parking areas in accordance with Appendix B

In particular (but not limited to), no parking is permitted:

- In the car park area at Sails Resort Centre between Clownfish Club and the Administration Office car park.
- Along Resort Drive between Beach Club and the Beach Pavilion gate (may park along Resort Drive in front of Hibiscus, Lagoon and Frangipani Lodges)
- On Front Street between the Ice Cream Parlour and Manta Ray Cafe (past the bus stop)
- On Front Street between the Hesperus and B Arm Headstock (parking is available at the Robert Oatley College car park)

13.4 On Duty Commerical Vehicles

Front Street:

Commercial Vehicles may only access Front Street if attending a job located within the Front Street zone. No other commercial Vehicles are permitted to access Front Street, with the following exceptions:

Dakon, Van	May only be driven for work numbers
Bakery Van	May only be driven for work purposes.
Beach Club, qualia, IC	May only access Front Street to drop off or collect Guests. Buggies must be used
& RDM Vans/ Cars/	to access Front Street for Guest services purposes, eg. purchasing items on behalf
Stretch Buggies	of Guests.
Emergency Services/	Whilst responding to an emergency call or alarm.
QAS Vehicles	
Island Safety and	May only be driven for work purposes.
Security Vehicles	
Warehouse Vehicles	May only be driven on Front Street for the sole purpose of delivering goods.
HIW Cars	May only be driven on Front Street when conducting wedding party transfers or
	photo tours.

Resort Zone:

Commercial Vehicles may only access the Resort Zone if attending a job located within the Resort Zone If attending Front Street or the Resort Zone for work purposes, any Vehicle used to transport goods, materials or tools may stop in an area close to the job that is safe and that does not unduly impede vehicular or pedestrian traffic whilst those goods, materials or tools are being unloaded. Once unloaded, the Vehicle must either vacate the area or park in a manner that complies with the parking regulations, detailed in Appendix B.

Pickup and drop off for commuters:

Pickup and drop off for commuters in all vehicle types excluding trucks is to be conducted from the barge ramp to the designated areas keeping clear access for buses. Driving to the Ferry Terminal is not permitted.

On Duty Exemptions for Parking:

There are some <u>dedicated parking spots</u> that are clearly marked as detailed below.

Front Street	 Explore may park their Suzuki Van in front of their Garage Door. Manta Ray / Romano's have a designated parking bay near the fire hydrant opposite the Manta Ray Cafe courtyard.
	 Vehicles driven by staff conducting work on Front Street may park behind the Bakery, loading dock of Yacht Club, near the Outrigger club – in accordance with the Appendix B.
Sails/ Resort Centre	 Concierge Vehicles may park in the designated bays under the covered areas in the Resort Centre car park.
Reef View/ Beach Club	 The Reef View and Beach Club VIP transfer Vehicles may park in the driveways of their respective hotels.
Airport	Access and parking is permitted in accordance with Appendix B

	The airport and associated car park is only accessible during operating hours and unapproved Vehicles must not remain in the precinct overnight.
IGA, Logistics & Boat Yard Area	 Commercial vehicles are permitted to use the Logistics barge ramp road however heavy vehicles must call through the two way on channel 37 before entering the barge ramp road. Commercial vehicles entering the Logistics area must obey the traffic signals and directions given by the logistics staff.
	 Vehicles aren't permitted to enter the logistics yard during 6am – 3pm unless authorised.
	 Commercial vehicles may only be parked in the designated parking bays if required for work purposes in that area.

13.5 Off Duty Commercial Vehicles

Commercial Vehicles are not to be driven after hours without prior approval.

Contractor Vehicles that have been granted permits from HIE may park their Vehicles in Palm Terrace Way (between Emergency Services and Palm Terraces) or in the parking area provided at Southern Views. The driver may collect their commuter staff from the signposted area between the barge ramp and bus-turning circle (opposite the Post Office/Outrigger building).

Registered Businesses that have been granted permits from HIE may park their Vehicles in Palm Terrace Way (between Emergency Services and Palm Terraces) or in the parking area provided at Southern Views.

Commercial vehicles if approved can be driven to the boat yard and must park past the travel lift/public amenity block, for the purpose of carrying fishing/camping gear/attending IGA, but must not be parked overnight.

14 Island Employee Accommodation

HIE may enter into a lodging agreement with an Employee to license the Employee to use accommodation owned or managed by HIE. Those Employees living within HIE accommodation are bound by the terms and conditions contained in the Staff Accommodation Compendium. Employees living in accommodation not owned or managed by HIE are subject to the lodging terms provided by their landlord.

15 Conduct during Emergency or Crisis

Employees should be aware that due to Hamilton Island's remote and tropical location they may be called upon to assist in the event of an emergency such as a cyclone, flood or other crisis situations. During these events, it is important that staff remain in a fit state for duty and follow all directions as instructed by Emergency Services and HIE management.

16 Breaches of the Code of Conduct

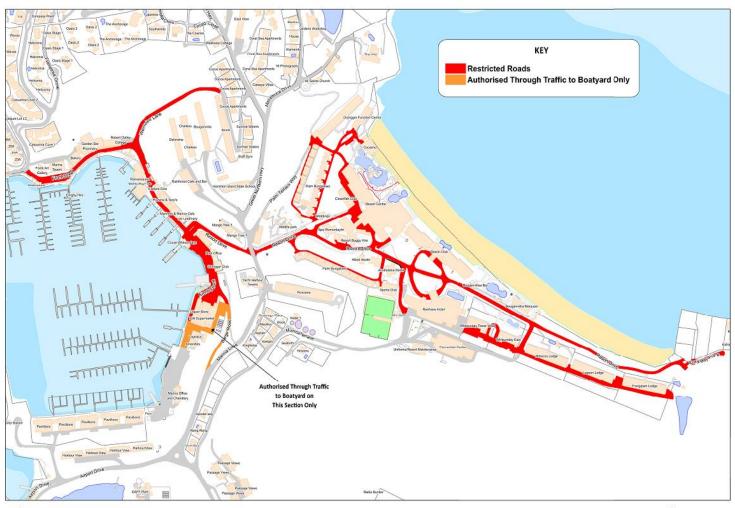
Breaches of any sections of the Code of Conduct will be investigated and actions taken against Employees may include suspended driving privileges, formal disciplinary action, bans from licensed venues on the Island, removal of the right to reside on Hamilton Island or Dent Island and/or termination of their employment contract.

17 Amendments

HIE reserves the right to amend the Code of Conduct as and when it deems appropriate.

18 Appendix

18.1 Appendix A – Vehicle Restricted Access Areas



HAMILTON ISLAND

HAMILTON ISLAND RESTRICTED ROADS

Drawn By: MM Date: 11/11/2018 GIS00374

18.2 Appendix B – Parking Maps – Front Street, Marina, Resort side and Airport

