

HAMILTON ISLAND

Employee Code of Conduct

Version: November 2024



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A message from our Executive Team

Hi Team,

Thank you for your dedication and commitment to achieving our vision, to be Australia's most desirable and sustainable island resort, globally renowned as an iconic Australian destination.

Our Employee Code of Conduct serves as a compass, guiding our actions and decisions in every aspect of our work to be consistent with Hamilton Island's values and taking us towards our vision.

We are immensely proud of Hamilton Island's culture. Our success is measured not just in numbers, but in the values we uphold, and the standards we maintain.

Each of us play a crucial role in upholding our values. Whether interacting with Employees, Guests or residents of our community, we must conduct ourselves with honesty and always do the right thing. We must prioritise our values of service, excellence, safety, environment and team in all our endeavours to achieve our mission.

By adhering to these principles, we safeguard Hamilton Island's reputation and nurture a positive and inclusive environment where everyone can thrive.

We encourage you to familiarise yourselves with our Employee Code of Conduct and make it an integral part of your daily work. Together, we can continue to build a workplace that fosters trust, innovation and excellence while creating extraordinary island experiences for our Employees, Guests and community.

Hamilton Island Executive Team

our *vision*



To be Australia's most
**desirable and
sustainable island
resort**, globally
renowned as an iconic
Australian destination.

our *mission*



To **create
extraordinary island
experiences** for our
employees, guests
and community.

our *values*



service

- / We create WOW moments every day
- / We make customer focussed decisions and constantly improve the customer experience
- / We are inclusive and understand our guests
- / We connect personally with our guests and exceed their expectations



excellence

- / We embrace technology and experimentation to enable innovative business decisions and practices
- / We act with honesty and integrity, and always do the right thing
- / We maximise economic returns for our shareholders



environment

- / We protect and improve our environment
- / We reduce our operational footprint
- / We acknowledge and involve Traditional Owners
- / We contribute to the success of our local community



safety

- / We are safe in everything we do
- / We embrace a Just Culture
- / We care for the safety and wellbeing of our employees, our guests and our community



team

- / We work as one team to achieve our Mission
- / We trust, respect and support each other
- / We create pathways for everyone to learn, grow and lead
- / We are inclusive of people and ideas by welcoming and encouraging diversity
- / We create fun and celebrate success

We work as a team to deliver our mission



Our collective mission is to create extraordinary Island experiences for our Employees, Guests and community. This Employee Code of Conduct sets out the principles of good conduct and standards of behaviour that are expected from everyone working for HIE, enabling us to achieve our mission. The Employee Code of Conduct is a key part of your terms of employment, and every Employee is responsible for reading, understanding and complying with its terms.

Ensuring a safe, fun, enjoyable and respectful environment for all our Employees, Guests and community is our top priority at HIE.

To achieve this, all Employees must uphold the highest standards of conduct, and represent our values, including at all times whilst on Hamilton and Dent Islands. This includes both during working hours and at all other times whilst present on either Island. It also extends to conduct at other locations where it could adversely impact HIE in any way or is incompatible with your duties to HIE. This includes activity online, such as social media use.

Always remember that you represent HIE at all times, especially whilst on Hamilton and Dent Islands. Even if you are not performing your duties, your actions can still reflect on HIE and have the capacity to affect other Employees and Guests, as well as HIE's reputation.

Your voice is important to us. All Employees have a responsibility to embody our values and speak up

whenever a situation could threaten our integrity, reputation, the environment or the safety of others. By speaking up, you provide us with the information necessary to investigate, address and resolve such situations.

The Employee Code of Conduct should be read alongside the Rules and Regulations and all other applicable HIE policies which apply to Employees. The Rules and Regulations set baseline requirements for all individuals travelling to or from, or who are located on the Islands, while the Employee Code of Conduct specifies additional expectations for all Employees.

Whilst the Employee Code of Conduct applies to all Employees, there will be specific requirements for Employees that apply when you are located on the Islands to ensure all Employees are committed to HIE's vision for the Islands. The Employee Code of Conduct unites us in Hamilton Island's vision to be Australia's most desirable and sustainable island resort, globally renowned as an iconic Australian tourist destination.

KEY POLICIES AND MORE INFORMATION

The Hamilton Island and Dent Island Rules and Regulations, the Employee Code of Conduct, and all Employee policies can be found on HISpace and UKG Talk. You can also request copies from your Manager.

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



Definitions

Term	Meaning
CEO	Chief Executive Officer of HIE or their authorised representative.
Employee or your or you	any person employed by HIE.
Employee Code of Conduct	this document which may vary from time to time.
Executive Team	the CEO, General Counsel, Director of Executive Operations and Planning and the General Managers of each division.
HIE, Hamilton Island, we or our	Hamilton Island Enterprises Limited ACN 009 946 909 and its related entities, subsidiaries, successors and assigns.
Island/s	Hamilton Island and Dent Island, including the Hamilton Island Marina.
Golf Buggy	a 2/4 seat buggy, which is a standard chassis length with seats and without a tray-back, that is a motorised vehicle used to transport persons and their belongings around Hamilton and Dent Islands. Often referred to as “buggies”, “golf buggies”, “golf cart” or “utility buggies.”
Guest	a person who is a visitor to the Island/s.
Manager	reference to a manager being the person appointed by HIE to hold the position for the time being.
Other Workplace Locations	workplace facilities located at: <ul style="list-style-type: none">• St Leonards Office 100 Pacific Highway, St Leonards NSW 2065• Shute Harbour Logistics Terminal 3363 Shute Harbour Rd, Shute Harbour QLD 4802
Property Owner	a person or entity that is the legal registered owner of a sub-lease or sub-sub-lease on Hamilton Island.
Resort or Resort Facilities	means the resorts and facilities in the area referred to in the section “Your conduct while on Hamilton Island and Dent Island” and set out in the maps.
Resort Zone	the area referred to in the section “Your conduct while on Hamilton Island and Dent Island” and set out in the maps.
Rules and Regulations	the Hamilton Island and Dent Island Rules and Regulations which may vary from time to time.
Vehicles	any motorised carriage used in the transport of persons or goods, any trailer, or Golf Buggies (including utility Golf Buggies).

We act with honesty and integrity, and always do the right thing

You are safe to speak

We actively promote and support a culture of honest and ethical behaviour, corporate compliance and good corporate governance. Our “Safe to Speak” Policy refers to the act of raising concerns about potential, suspected or actual misconduct (‘Misconduct’) and is a key element of our governance framework.

As part of the HIE team you can feel safe to raise concerns. Speaking up is integral to fostering a culture of transparency, trust and accountability within HIE. Employees, directors and other officers of HIE who have reasonable grounds to suspect that Misconduct has or is occurring must make a report. Anyone else who has similar suspicions is also encouraged to make a report. This category of persons includes past Employees, directors and other officers, contractors, suppliers and their employees, associates as well as persons related to any of the above.

HIE unequivocally prohibits retaliation against Employees who raise concerns in good faith. Any retaliatory behaviour is taken extremely seriously by HIE, and may result in disciplinary action, up to and including termination.

HIE will ensure that all concerns are considered and addressed sensitively and confidentially. If you are unsure whether it is necessary or appropriate to report a concern, or generally to take a certain action, ask yourself questions like:

1. Is this action consistent with our vision, mission and values?

2. Could this action damage HIE's interests or a person's relationship with HIE?

3. Is this action compliant with legal obligations?

4. Is this action safe, fair and/or just?

5. Does this action comply with the Employee Code of Conduct, and HIE policies and procedures?

6. Would my supervisor / manager be comfortable and/or proud seeing this action in a news story or on social media?

Where a concern is reported, we are committed to promptly acknowledging, and where appropriate investigating and addressing reported concerns. While we take all concerns seriously, we emphasise that knowingly or deliberately false, misleading or vexatious accusations may be subject to disciplinary action.

We are committed to providing training to all Employees on the elements of the Employee Code of Conduct and will provide resources for you to be able to speak up.

We act with honesty and integrity, and always do the right thing

Seeking guidance and voicing concerns

We value open communication and believe that every Employee of HIE should feel comfortable seeking guidance and voicing concerns without fear of reprisal.

There are multiple channels available for Employees to report concerns, including direct supervisors, the People, Culture and Development Department, senior management, the Executive Team and the Safe-to-Speak platform Whispli.

If you encounter a situation where you are unsure of the appropriate course of action or if you have concerns about potential Misconduct, we encourage you to reach out to your Manager; People, Culture and Development representative, or any member of the Executive Team.

Additionally, anonymous reports may also be made through Whispli, to ensure that all voices are heard and all issues are addressed promptly and confidentially. Your feedback is essential in maintaining the integrity of our workplace, and we are committed to addressing any concerns with diligence and respect.

All reports of concerns should be made pursuant to HIE's Safe to Speak Policy, Grievance Procedure or the Complaints Procedure – EOO, which provide further details regarding whom to contact, what information to include, and how to follow up on reports.

We follow the law, rules and regulations

There are a significant number of obligations that apply across our day-to-day activities at work, to the services we provide and the products we sell. They come from laws, regulations, codes, business or ethical standards, and internal policies. You are expected to be aware of, understand and comply with all obligations that are relevant to your role. This requires you to proactively monitor and respond to relevant obligations. Claiming ignorance of the law or HIE stated requirements is no defence. Information, support and training are available. If you have any doubts, questions or concerns you must raise them.

If you receive a request from a government agency or authority for information needed, including for an investigation or audit, it should be immediately reported to the Legal Department which will provide guidance to you before responding to any agency. All information provided should be truthful and accurate, false reporting to government agencies is strictly prohibited. It is your responsibility as an Employee not to alter, falsify, conceal, dispose of, or destroy any documents or records related to a government request, investigation, or legal proceeding.

We act with honesty and integrity, and always do the right thing

We never make or receive improper payment, benefits, or gains, and always deal ethically

Conflict of interest

You must take reasonable steps to avoid any conflict of interest (actual, potential or perceived) in connection with your employment or engagement on or in connection with HIE; and must disclose details of any actual, potential or perceived conflict of interest in the manner outlined in the Conflict of Interest Policy.

A conflict of interest means an actual, potential or perceived conflict between an Employee's role, duties and/or responsibilities for the benefit of HIE ('Work Interests') and their private interests ('Private Interests') that could, or could be seen to, improperly influence the decisions or actions they are taking or the advice they are giving in connection with, or arising out of, their Work Interests.

You or any other Employee who has an actual conflict of interest, or a potential conflict of interest, between their Work Interests and Private Interests, or where others may perceive a conflict of interest, must disclose this immediately after they become aware of it. The Conflict of Interest Policy outlines the declaration process an Employee must follow.

Ethical business practices

HIE are committed to the highest standards of conduct and ethical behaviour in all our business activities. We actively promote and support a culture of honest, transparent and ethical behaviour, corporate compliance and good corporate governance.

HIE's Ethical Dealing Principles summarises the principles we adopt in dealing with our key stakeholders and forms part of the Employee Code of Conduct. The Ethical Dealing Principles are available and can be accessed via <https://balmoralaustralia.com/wp-content/uploads/2024/02/Ethical-Dealing-Principles-Final-1.pdf>.

KEY POLICIES AND MORE INFORMATION

- Hamilton Island and Dent Island Rules and Regulations
- Safe to Speak policy
- Ethical Dealing Principles
- Conflict of Interest Policy
- Grievance Procedure
- Complaints Procedure – EOO
- [Whispli confidential reporting](https://balmoralaustrialigroup.whispli.com/s/afetospeak) via <https://balmoralaustrialigroup.whispli.com/s/afetospeak>

For further information, ask your Manager or the People, Culture and Development Department at:

employeerelations@hamiltonisland.com.au



We care for the safety and wellbeing of our Employees, our Guests and our community

We are inclusive of people and ideas by welcoming and encouraging diversity

Treating each other fairly and with respect, while enjoying ourselves as we work, is an important part of HIE's culture. Part of maintaining a fun, safe and enjoyable work environment is providing equal employment opportunities for everyone, and maintaining a work environment that is inclusive and free from discrimination, sexual harassment, and discrimination.

HIE prioritises providing a supportive and collaborative work environment that encourages participation and contributions by all Employees. Our expectation is that all Employees feel welcome, valued, and supported in their pursuit to grow and succeed in their careers.

We create a safe work environment free from sexual harassment and bullying for everyone

We are steadfast in our commitment to creating a workplace that is free from sexual harassment and bullying. Every Employee deserves to work in an environment where they feel safe, respected, and valued. HIE has zero tolerance for any form of discrimination, harassment or bullying, whether verbal, physical, or in writing (including over email or on social media).

Sexual harassment and discrimination are unlawful and will not be tolerated under any circumstance.

Our policies, including (but not limited to) Equal Employment Opportunity Harassment and Bullying Policy, strictly prohibit any behaviour that undermines the dignity or wellbeing of our Employees. We encourage anyone who experiences or witnesses such Misconduct to report it immediately to the People, Culture and Development Department, to your Manager or any member of the Executive Team. We take all reports seriously and will investigate them thoroughly, taking appropriate action to ensure a safe and inclusive workplace for everyone.



We care for the safety and wellbeing of our Employees, our Guests and our community

We are safe in everything we do

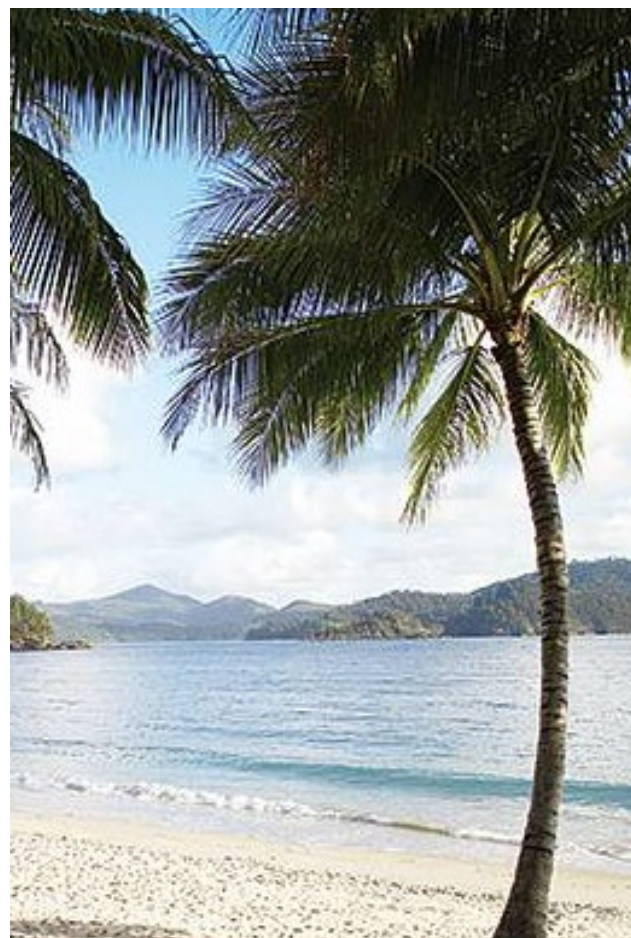
The safety and wellbeing of our Employees is a priority. We are committed to providing a work environment that prioritises safety in all aspects of our operations. This includes regular safety training, providing necessary safety equipment, and maintaining a culture of vigilance and accountability. We empower every Employee to take an active role in identifying and addressing potential hazards to prevent accidents and injuries. We adhere to all relevant health and safety laws and regulations and continuously strive to improve our safety protocols. If you have any safety concerns or suggestions for improvement, please don't hesitate to raise them with your Manager or our dedicated Safety Department. Together, we can ensure that every Employee returns home safely at the end of each day.

HIE is committed to:

- Ensuring compliance with Work Health and Safety (WHS) legislative requirements, including the applicable WHS Acts, supporting Regulations, and applicable Codes of Practice;
- Implementing an effective WHS Management System, and the plans, policies, procedures and programs necessary to support and implement this policy;
- Integrating WHS into all aspects of its operations; and
- Ensuring, as far as reasonably practicable, a workplace that is without risks to the health and safety of Employees.

All Employees are required to:

- Take reasonable care for, their own health and safety and that of all other people in the workplace
- Adhere to the WHS policies and systems of HIE, and its safe work practices, instructions and rules;
- Report concerns, hazards, unsafe situations or injuries immediately;
- Hold any current licences and certificates which may be required;
- Not misuse, damage, refuse to use, or interfere with anything provided or procured by HIE in the interest of WHS;
- Participate in safety training and perform all work duties in a manner which is consistent with that training ; and
- Encourage other Employees to create and maintain a safe and healthy work environment.



We care for the safety and wellbeing of our Employees, our Guests and our community

Alcohol, drugs and smoking/vaping

Illicit drugs and drug paraphernalia is prohibited under New South Wales and Queensland laws. The possession or use of illegal drugs or drug paraphernalia will not be tolerated under any circumstances within Other Workplace Locations or on the Islands at any time. This includes during an Employee's working hours and at all times that Employees are present on the Islands (including within HIE's hospitality venues), or Other Workplace Locations.

There are a number of restrictions in place regarding the consumption of alcohol, smoking of cigarettes, including vaping, and Employees should refer to the Hamilton Island and Dent Island Rules and Regulations, No Smoking or Vaping Policy, Alcohol and Other Drug Policy and the Hamilton Island Risk Assessed Management Plan and House Policies (available in venues serving alcohol) for more information.

In order to maintain a safe and productive work environment, all Employees are required to ensure that they are not under the influence of alcohol, drugs, or any other substances that impair their judgment or performance while at work, including exceeding applicable blood alcohol levels. Employees must exhibit appropriate and professional behaviour at all times, ensuring that their actions do not endanger their own safety, the safety of those around them, or the reputation of HIE.

Any behaviour that compromises safety, productivity, or the wellbeing of Employees will not be tolerated. HIE emphasises that alcohol should be consumed responsibly at all times while on the Islands and behaviour must not bring HIE into disrepute.

If you are unsure about any aspect of these policies or your obligations under them, we encourage you to ask your Manager and the People, Culture and Development Department.

KEY POLICIES AND MORE INFORMATION

- Hamilton Island and Dent Island Rules and Regulations
- Equal Employment Opportunity, Harassment and Bullying Policy
- Complaints Procedure – EEO
- Workplace Health and Safety Policy
- Workplace Rehabilitation and Return to Work Policies
- No Smoking or Vaping Policy
- Hamilton Island Risk Assessed Management Plan and House Policies
- Alcohol and Other Drug Policy



We make customer focused decisions

We protect personal information

HIE is committed to respecting privacy and taking measures to protect personal information from misuse or unauthorised disclosure and complying with applicable privacy laws. We collect, use and share personal information where it is needed for legitimate business purposes, including from Guests, and from our Employees for purposes related to their employment, or in the case of contractors or other parties, in relation to their engagement with us, or where there is a legal need to do so.

Everyone at HIE should understand the importance of respect for privacy and ensuring personal information is respected, managed and protected.

We have specific privacy obligations for personal information held by HIE, and any wrongful use, disclosure or loss of personal information is a serious matter.

Please see the Privacy Policies for further information and HIE has appointed a Privacy Officer who can be contacted via privacy@hamiltonisland.com.au for any feedback or queries.

We maintain confidentiality

Confidential information may include, but is not limited to: Employee details, trade secrets, marketing information, customer or Guest 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 Employees and/or HIE have access to confidential information we must not reveal this information without appropriate authorisation.

Confidential information should not be used for personal gain and it must be protected from theft, unauthorised disclosure or inappropriate or unauthorised use. Confidentiality obligations are set out further in Employee's contract of employment.

From time to time, HIE has high profile and well-known identities on the Islands and Employees should ensure the Guest's privacy and respect their right to confidentiality.

We make customer focused decisions

We are conscious of our social and media presence

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 online.

When communicating on Social Media, you must remain aware that this information is available for global viewing. Even when you are engaging with a limited number of persons or in what you intend to be a private forum, that material is always capable of being disseminated to a broader audience. As such, when referring to any aspect of your work, the Islands or HIE in any form of Social Media, all Employees are responsible for acting with discretion and abiding by the Social Media Policy and other relevant HIE policies at all times. You 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. Employees are required to adhere to the Media Policy.

No Employee is to provide information to any media organisation or media representative, unless authorised to do so by the CEO.

You must not respond to, tip off, email, SMS, talk to, Skype, provide film footage or photography to or act on behalf of HIE by taking part in an unauthorised interview.



KEY POLICIES AND MORE INFORMATION

- Privacy Policies
- Social Media Policy
- Media Policy

For further information or any questions in relation to your obligations under these policies, please ask your Manager, the People, Culture and Development Department and Director of Marketing at pr@hamiltonisland.com.au.



Your conduct while on Hamilton Island and Dent Island

Given the unique nature of our location and business, there are additional requirements when working on Hamilton Island or Dent Island or while visiting.

Behavioural expectations

Employees are required to maintain a high standard of professionalism while on the Islands both while working and while off-duty.

HIE appreciates and encourages Employees to enjoy their time on the Islands whilst not working. HIE also appreciates that Employees have private lives outside of work.

However, as an Employee, your actions have the capacity to directly impact upon other Employees, workers, Guests, and the interests and reputation of HIE, at all times you are present on Hamilton and Dent Islands. Your obligations under this Code of Conduct extend further than solely whilst in your ordinary workplace or during times you are at work.

This includes during times that you are not rostered to work or performing any work duties, but are present on the Islands, including in HIE's hospitality venues.

HIE also holds positive legislative duties to ensure the health and safety of workers and to eliminate unlawful conduct (including sexual harassment). Your actions whilst on the Islands, even whilst not at work, have the capacity to impact upon others in the workplace and these duties.

You must ensure that your actions reflect the Company's values and expected standards of conduct in accordance with this Code of Code, the Rules and Regulations, and HIE's policies and procedures, at all times you are present on the Islands and otherwise outside of your working hours.

Your conduct at all times (even outside of work hours and while on the Islands or elsewhere) must:

- Be appropriate and with a dignified manner;
- Be respectful and polite to people on the Islands, including fellow Employees and Guests;
- Allow Guests to be served first, including Guests boarding and disembarking the bus;
- Ensure suitable clothing and footwear is worn all times;
- Ensure noise is kept to a minimum when moving around the Islands; and
- Follow roads and pathways at all times and avoid walking in front of Guest accommodation or pool areas to the extent possible.

Your conduct while on Hamilton Island and Dent Island

Given the unique nature of our location and business, there are additional requirements when working on Hamilton Island or Dent Island or while visiting.

Behavioural expectations

Whilst on duty and/or in uniform, you must:

- Adhere to the Presentation Policy and applicable uniform standards;
- Not swear or talk about personal affairs in the company of Guests;
- Address all Guests by name where possible and respond positively, for example, “My pleasure”, “May I help you?”, and “I will find out for you”;
- Not use mobile phones whilst in uniform, unless required for your role (headphones and earbuds are not permitted);
- Access the workplace through back-of-house/staff entries where possible;
- Consume food in designated Employee areas;
- Have a specific purpose for visiting retail outlets on Front Street while in uniform and not loiter unnecessarily; and
- Notify the outlet Manager if Managers are required to conduct a Guest or business meeting in a food and beverage outlet while in uniform.

Non-compliance with this Code of Conduct at any time, or the Rules and Regulations whilst present on Hamilton or Dent Island, including outside of work hours, may lead to disciplinary action up to and including the termination of your employment.

Examples of breaches of this Code of Conduct, which may result in disciplinary action, include:

- unduly intoxicated, disorderly, violent or abusive behaviour, including at HIE hospitality venues;
- abusive or anti-social behaviour towards other Employees (including Island Security) or Guests;
- sexual harassment, discrimination or other forms of unlawful conduct towards any other person, including electronically or online;
- the possession or use of illicit drugs; and
- any other conduct which negatively effects other Employees, Guests or HIE's reputation.

Your conduct while on Hamilton Island and Dent Island

Given the unique nature of our location and business, there are additional requirements when working on Hamilton Island or Dent Island or while visiting.

Socialising with guests

There is a standard of professionalism required by Employees towards Guests. You are not permitted to invite Guests to your accommodation or go to the Guests accommodation without approval from your General Manager. Guests are not to attend Employee facilities such as the Rainforest Café or R-Bar without a visitor pass being issued by Island Security.

Vehicle use

Employees may be authorised by HIE to drive Vehicles. You assume the duty of obeying all Vehicle and road laws, the Queensland Road Rules, maintaining the Vehicle properly at all times and abiding by the Rules and Regulations.

The Vehicle and Licensing Policy in conjunction with the Rules and Regulations set out the responsibilities of those operating a Vehicle at any time.

CCTV

CCTV and other forms of recording may occur across the Islands and Other Workplace Locations for safety and security purposes in accordance with the CCTV and Use of Footage Policy. Signage is installed so that Guests and Employees are aware. Footage may be used in accordance with the Workplace Surveillance Policies.

Conduct during an emergency or crisis

Due to the Islands remote and tropical location, you 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 you remain in a fit state for duty and follow all directions as instructed by Emergency Services and HIE management.

Your conduct while on Hamilton Island and Dent Island

Given the unique nature of our location and business, there are additional requirements when working on Hamilton Island or Dent Island or while visiting.

Resort Zone

The Resort Zone and Resort Facilities (set out in the maps in Appendix A, B, C and D) 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").

You are not to be within the Resort Zone after 10:00pm unless you are returning from an approved venue listed below or are in possession of a Pass.

Employees are ordinarily not permitted within Qualia unless required for work.

Exceptions

If you are a Property Owner or a resident of property within the Resort Zone you are able to use the Resort Facilities without a Pass.

As an exception, you are permitted to dine at the following venues without a Pass:

- Sails
- Coca Chu
- Pool Terrace
- Beach Club
- The Sundays
- Long Pavilion
- Pebble Beach

You are able to access activities, such as mini golf, the Sports Club, bowling and retail outlets within the Resort Zone without a Pass.

You are able to attend Spa qualia for an appointment or Qualia boutique to purchase items without a Pass.

Other outlets within the Resort Zone, including Reef Lounge, Island Bar, Beach Club (other than the restaurant), and the pools (Main, Sails, Reef View Hotel, Beach Club, The Sundays and Bougainvillea) require a Pass.

Employees' access to activities and venues is subject to change and will be subject to Guest demand.

Employees staying at HIE Hotels

If your ordinary place of work is an Other Workplace Location and are travelling to and staying at the Reef View Hotel or other hotels whilst on the Islands for work purposes, you are permitted to visit the Reef Lounge and Reef View Pool without a Pass.

If your ordinary place of work is Hamilton Island and are staying at the Reef View Hotel, or other hotels as temporary accommodation (for example, whilst Employee accommodation is being arranged) you are not permitted to go to the Reef Lounge or the Reef View Pool.

Your conduct while on Hamilton Island and Dent Island

Given the unique nature of our location and business, there are additional requirements when working on Hamilton Island or Dent Island or while visiting.

Use of pools and beaches

Employees, including Employees travelling to the Islands for work, may use the south-eastern end of Catseye Beach between sunrise and sunset, from the laneway adjacent to the Beach Pavilion. You are not permitted to use the pool and beach chairs or lounges.

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

Pool areas in the Resort Zone are reserved for Guests only, unless you have a Pass or are otherwise authorised.

Exceptions

Families who reside in Harbour View or East View staff accommodation are permitted to use the Bougainvillea Pool.

The Reef View Hotel swimming pool may be accessible to Employees who are training for a sporting event or competition. You must receive approval and register with the Sports Club Manager before using the pool and conditions of use apply.

Pools within private residence complexes

Unauthorised use of pools in the complexes of private residences on Hamilton Island is strictly prohibited. These residences are private property.

Obtaining an On Premise Pass

You are required to have an acceptable reason for applying for a Pass such as a booking at a resort within the Resort Zone, friends or family staying as Guests in the Resort Zone. You may obtain a Pass from HISpace or HiForms and take it to the General Manager of your division for approval.

For further information or any questions regarding these policies, please ask your Manager, the People, Culture and Development Department and Island Security.

KEY POLICIES AND MORE INFORMATION

- Hamilton Island and Dent Island Rules and Regulations
- Staff Accommodation Agreement and Staff Accommodation Code of Conduct
- Presentation Policy
- Vehicle and Licensing Policy
- CCTV and Use of Footage Policy
- Workplace Surveillance Policies
- Business Emergency and Natural Disaster Employment Policy
- Hamilton Island Cyclone Plan



We protect and improve our environment

The Islands are located off the Queensland coast of Australia, within the Whitsunday Islands at the edge of the Great Barrier Reef. We recognise our responsibility to protect and preserve this unique location for current and future generations. We are committed to minimising our environmental footprint and promoting sustainable practices in all aspects of our operations. This includes reducing waste and increasing recycling, conserving resources and minimising use of energy and water, and implementing eco-friendly technologies.

HIE must comply with all environmental laws and regulations and will proactively seek opportunities to go beyond our compliance. Through innovation and collaboration, we aim to continuously improve our environmental performance. We encourage all Employees to contribute their ideas and efforts towards our environmental goals and to be mindful of the impact of their actions on the planet. We also encourage all Employees to be mindful of their consumption of water, electricity and gas, including in staff accommodation and look to minimise as much as possible. The Rules and Regulations set out requirements in relation to the environment that Employees must adhere to at all times. Together, we can make a positive difference and create a more sustainable future.

The Islands are a haven for many wildlife species, including birds, mammals and reptiles. Hamilton Island has a detailed ‘protected wildlife management strategy’ that has been developed in close consultation with the Queensland Department of Environment and Heritage protection. Hamilton Island abides by this policy at all times.

We acknowledge the traditional owners of the land on which we work and live

Hamilton Island acknowledges the traditional owners of the Whitsundays, the Ngaro and the Gia people, and their connection to land, sea and community.

We further acknowledge the Cammeraygal people, Traditional Custodians of the land on which our St Leonards team work.

We pay our respect to Elders past and present and extend that respect to all Aboriginal and Torres Strait Islander people.



KEY POLICIES AND MORE INFORMATION

- Hamilton Island and Dent Island Rules and Regulations

For further information or any questions regarding these policies, please ask your Manager and the People, Culture and Development Department



We are all accountable for complying with the Code

To create extraordinary experiences for our Employees, Guests and community, it is essential that all Employees display and promote professional attitudes and behaviour at all times during work hours, at Other Workplace Locations and while located on the Islands.

You must:

- Work with your team to achieve our mission to create extraordinary experiences for our Employees, Guests and community while respecting our Values;
- Perform all duties to the best of your ability in a safe, responsible and effective manner;
- Ensure your personal, business and financial interests do not conflict with your duties at work;
- Respect the differences of others;
- Not engage in unlawful conduct, including being involved in, or encourage, discrimination, bullying harassment or sexual harassment of any kind;
- Maintain confidentiality and privacy; and
- Read, understand and work within relevant laws and HIE's policies, procedures and rules, ask for a copy of all relevant policies and procedures from your Manager if required.

As a Manager and leader, you must:

- Comply with the obligations applicable to all Employees;
- Make all HIE policies and procedures available to Employees as required;
- Provide a working environment that is aimed at achieving our Vision and Mission while respecting our Values;
- Set an example for others by demonstrating what it means to act with integrity through your own actions;
- Read, understand and work within relevant laws and HIE's policies, procedures and rules;
- Ensure Employees have the knowledge and resources to follow the standards of this Employee Code of Conduct and to enforce those standards;
- Ensure fair and consistent treatment of Employees;
- Understand and strictly follow our policy of non-retaliation;
- Report instances of non-compliance with laws, regulations or policies appropriately;
- Take reasonable and proportionate steps to eliminate discrimination, bullying and harassment in the workplace; and
- Maintain confidentiality and privacy.

All Employees are expected to follow the Employee Code of Conduct as well as the Rules and Regulations. If you breach either of these, disciplinary action may be taken up to termination of employment. Common situations where disciplinary action may result are unsatisfactory job performance, unexcused tardiness/absence or failing to follow policies and procedures.

Disciplinary action may include one or more of the following:

1. Counselling;
2. Verbal warning;
3. Written warning; and
4. Termination.

Each situation will be dealt with on an individual basis.

We are all accountable for complying with the Code

Where HIE holds concerns in relation to an Employee's conduct or performance, the Employee will be given a reasonable opportunity to respond to the concerns.

Serious offences

We have a zero-tolerance policy for serious misconduct. Alleged serious misconduct will be investigated and, if substantiated, is likely to result in disciplinary action up to termination of employment.

The following is a non-exclusive list of serious conduct that may result in immediate termination of employment:

- Sexual or other forms of harassment, discrimination, or any other unlawful conduct towards any person including Employees or Guests;
- Bullying;
- Physical violence or assault or threats of same;
- Fraud, deceit, falsification or misrepresentation of employment documents, including applications and resumes or payroll information and unauthorised destruction of documents;
- Theft, neglect or misappropriation of money or HIE property of any kind, including charging or giving away free products or services to Employees or Guests;
- Forgery or alteration of invoices, cheques, records and other documents;
- Recording an unsafe or illegal blood alcohol level, and/or being under the influence of illegal drugs (including drugs which have not been consumed in accordance with a prescription), when working or otherwise in contravention of laws, including breaches of the Queensland Road Rules, or otherwise being under the influence such that your duties are impaired;
- Unlawful possession, consumption, sale and/or distribution of alcohol and/or other drugs;
- Insubordination or deliberate serious breaches of policies, procedures or instructions, especially relating to WHS or environment policy and procedures and/or regulations;
- Misuse or theft of HIE telephones, photocopiers, internet, e-mail, IT infrastructure and other property and services. Please see the IT Policy for more information;
- Breach of privacy or confidentiality by the unauthorised distribution or storage of Guest details or other serious matters of this nature affecting HIE's business reputation;
- Unauthorised or improper use or damage of Vehicles;
- Tampering with or unapproved use of safety equipment. For example, fire protection equipment; and
- Unauthorised disclosures, comments to, or contact with any form of media.

What this means for you

Everyone at HIE must use good judgement, uphold our standards of professionalism and work in a manner that complies with the spirit and requirements of this Code of Conduct.

This means you are responsible for:

- Reading, understanding and complying with the Employee Code of Conduct, applicable laws and the HIE policies, standards, or procedures that apply to your role;
- Completing all training assigned to you;
- Seeking advice from your Manager, or the People, Culture and Development if you are unsure how to proceed or make a decision;
- Speaking up without delay and reporting any conduct or activity you believe is dishonest, unethical, corrupt, inappropriate or illegal. This may include reporting your own observations, those made to you by others, and instances where the conduct involves one of HIE's business partners; and
- Cooperating with and being honest in any internal investigations.

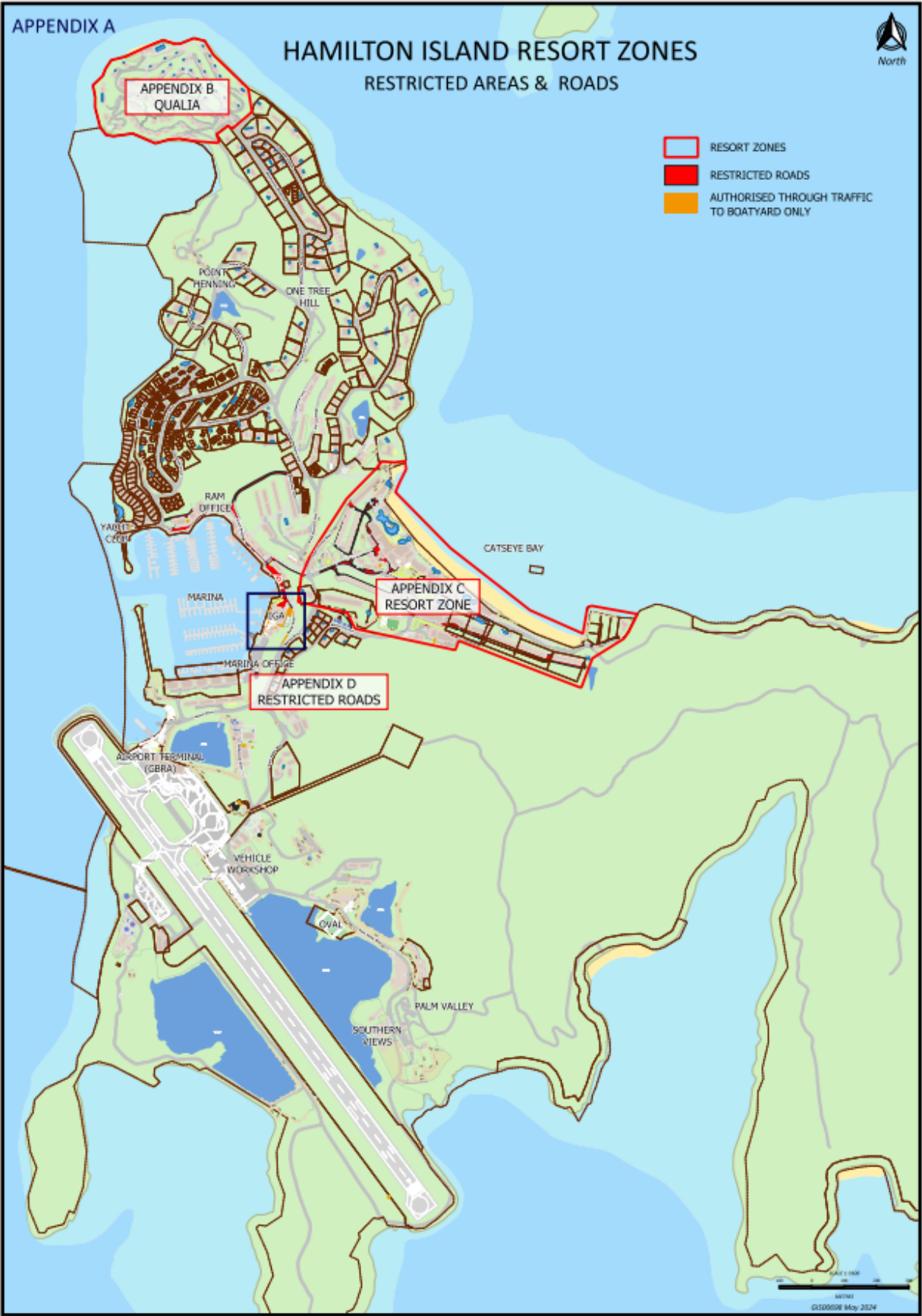
Breaches of the Employee Code of Conduct are taken seriously, and will be reviewed to determine if, and what, consequences should be applied. Consequences that may apply could range from informal coaching and development, through to a warning, an impact on remuneration, or termination of employment in the case of more serious breaches.

HIE will comply with legal obligations regarding the reporting of incidents, including breaches of the law to regulators and law enforcement agencies.

HIE reserves the right to have Hamilton Island owned and operated Vehicles and bags searched by the Island Security Department or otherwise an Employee or Manager authorised by HIE when there is a reasonable suspicion of inappropriate or illegal activity. You are required to comply with any such request.



Appendix A



Appendix B



Appendix C



Appendix D

