

just.Gold

Policies & Guidelines

Version 2.22



This company meets the
highest standards of social
and environmental impact

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Code of Ethics

This Code of Ethics acts as a framework and moral compass for how we operate and behave as part of Just Gold Digital Agency.

This code will be applicable across all business decisions and will guide us in who we choose work with, as detailed further in our Supplier Policy.

Vision

We work with the vision of A Just World. Access to Opportunity for All.

Mission

We enable and activate projects with purpose by offering accessible high end consulting services.

We connect and empower highly skilled professionals who are facing employment barriers.

Values

Everyone matters. We treat our clients, our audiences, colleagues & members of our community with respect, consideration and dignity.

Everyone is different. We embrace diversity.

We all depend on each other.

Integrity is in the core of our system. We act with trustworthiness, honesty and fairness.

We are all responsible team

members. We deliver on our commitments and are accountable. We work together willingly. We cooperate and share our challenges and successes.

Everyone is an innovator. We foster creativity and distinctiveness. We encourage new thinking and strive to achieve quality in all that we do.



Our Commitments

Aboriginal and Torres Strait Islander Acknowledgement.

We work on the lands of the Bunurong Boon Wurrung and Wurundjeri Woi Wurrung peoples of the Eastern Kulin Nation, and The Gadigal peoples of the Eora Nation.

We pay respect to their Elders past, present and emerging and commit to strengthening our relationships with these communities through the actions in our Reconciliation Action Plan .

Environmental impact. Just Gold acknowledges our responsibility to reduce our carbon footprint and promote sustainable practices. We operate as a paperless business and reuse and recycle whenever possible, as outlined in our environmental policy.



Privacy and Confidentiality Policy

Purpose of this policy

The purpose of this Privacy and Confidentiality Policy is to provide guidelines to protect the privacy and confidentiality of Just Gold directors, staff, contractors, consultants, volunteers and others.

Personal information held or entrusted to Just Gold by its directors, staff, contractors, consultants, volunteers and others must be respected and maintained properly at all times and remain compliant with the Privacy Act 1998 (Cth).

All personal information of our directors, staff, contractors, consultants, volunteers and others is treated as confidential. Should Just Gold hold medical information regarding any staff, contractors, consultants, volunteers and others, it must be treated as 'medical-in-confidence' and stored separately.

Our Expectation

Directors, staff, contractors, consultants, volunteers and others have an obligation not to disclose or misuse confidential information relating to Just Gold or any of our projects. This obligation exists in every relationship even if it is not written in a contract and it continues after the period of engagement/employment.

Information confidential to Just Gold is defined as that which is not known in the public domain. Just Gold reserves the right to designate information as confidential at any time.

Directors, staff, contractors, consultants, volunteers and others are entitled to confidentiality and privacy regarding information that is personal to them and have a duty to maintain the confidentiality, integrity and security of such information, in any form, to which they have access in the normal course of their work with/for Just Gold.

Information may be disclosed only where the disclosure has been authorised by the original provider and/or is required or authorised by legislation.

Non-disclosure: During or after their appointment or employment with Just Gold, directors, staff, contractors, consultants, volunteers and others will not use any confidential information in any way other than for the business of Just Gold, and will not disclose, use, or transfer any confidential information other than as authorised by Just Gold.

Disclosure prevention: Directors, staff, contractors, consultants, volunteers and others will take all reasonable precautions to prevent the intentional, negligent, inadvertent or accidental disclosure of confidential information by them or any other person or entity in possession of such information.

Copying/removal: Directors, staff, contractors, consultants, volunteers and others will not make copies of, or remove from Just Gold premises, any physical embodiments of confidential information except for use in the company's business or as authorised by Just Gold.



Return: Directors, staff, contractors, consultants, volunteers and others will return to Just Gold all physical embodiments of confidential information and all other property of the company at any time at the request of the company, and in any event and without request by Just Gold prior to the effective date of termination of their appointment / employment.

Termination: Employees acknowledge that their employment with the Just Gold may be subject to termination (on notice or by way of summary dismissal) for any breach of this policy and that any such termination will not relieve them of their continuing obligations under the policy or from the imposition of any judicial remedies such as monetary damages or injunctive relief.

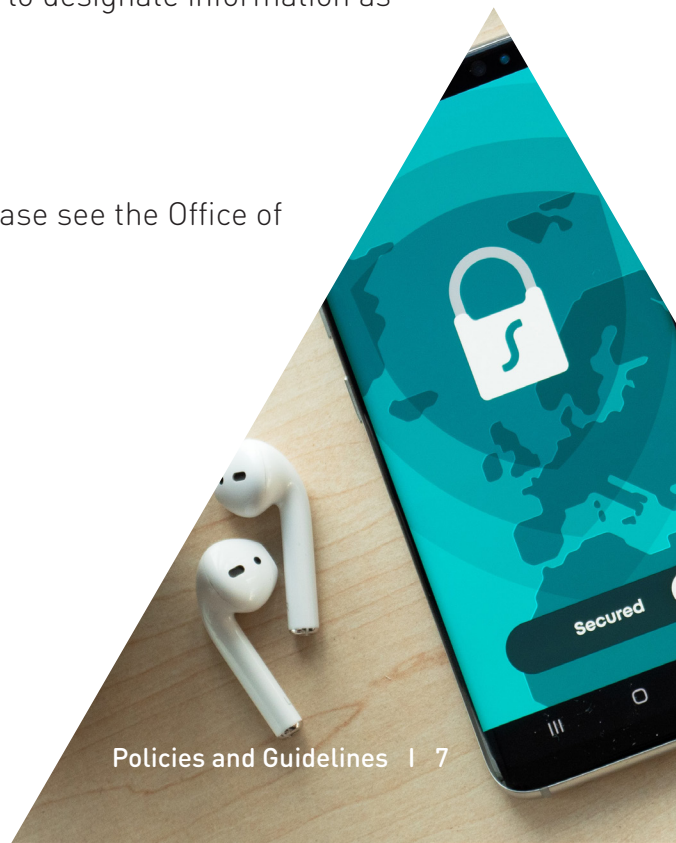
What do I do if there is a breach?

Directors, staff, contractors, consultants, volunteers and others have an obligation not to disclose or misuse confidential information relating to Just Gold or any of our projects. This obligation exists in every relationship even if it is not written in a contract and it continues after the period of engagement/employment.

Information confidential to Just Gold is defined as that which is not known in the public domain. Just Gold reserves the right to designate information as confidential at any time.

Further resources

For further guidance on your privacy rights, please see the Office of the Victorian Information Commissioner [here](#).





Complaints and Compliments Policy

Overview

Just Gold welcomes feedback in the form of compliments, suggestions and complaints.

We believe that each of these forms of feedback enables us to improve and extend the services we offer and how we offer them. Just Gold knows that all feedback is a catalyst for improvement across the work we do and the people we work with. Feedback, whether it be a complaint or compliment, is considered seriously and integrated into the work we do, furthering the delivery of high-quality services.

Please note that this policy covers the work of our Company and the conduct of our directors, employees, contractors and volunteers. If you would like to discuss our editorial content, please refer to the *Editorial Guidelines*.

How we respond

In response to complaints, Just Gold commits to address each complaint:

- even-handedly;
- to follow the principles of natural justice;
- to maintain confidentiality, within the scope of the law, regarding,
- the identity of the people involved
- the content of the complaint
- the process of complaint resolution
- to keep those involved informed, in general terms, of the progress of the process of addressing the complaint
- to apply a clear internal procedure
- to reflect upon and learn from complaints
- to put into practice learnings from complaints



Complaints can be made by telephone, in person or in writing by email or letter. If you talk to us, we will confirm in writing what you have told us to confirm we have got it right.

We will respond to complaints within 30 days.

We will respond to you courteously and promptly and aim to do so in our stated timeline. However, the complexity of the issues you raise will contribute to determining the timeline of Just Gold's inquiry.

If you make a complaint about a Just Gold process or project, we will request the details and pass the complaint to the relevant person(s).

After referring to any relevant emails or other documents, we will provide a response which could include an explanation, an apology and/or an action to improve the situation or fix it.

Our process

Our complaint process is a confidential one. This means anything discussed or agreed to during the process remains confidential and cannot be used in any other forum, disseminated to other people or placed on any form of social media. You will be asked to agree to the confidentiality of the process.

Just Gold recommends you discuss confidentiality with your lawyer.

The process is a transparent one. This means anything you provide us will be shared with the person who is subject of the complaint and anything provided by that person will be shared with you. In some circumstances information may not be shared, either upon request by one of the parties and the agreement of the CEO or at the discretion of the CEO or directors. If this happens reasons for non-sharing will be provided.

The other important matter is that the CEO will need to know the outcome or resolution you are seeking. You will be asked to provide this information.

Once information from yourself and the individual concerned are provided the matter is then given to the CEO who will examine all the information and provide a response and outcome.



Outcomes

The outcome of your complaint can vary and may include:

- A notification to the person concerned only
- No further action - with an explanation as to why
- Guidance of referring your complaint elsewhere if a different forum is more suitable
- An apology
- An undertaking by Just Gold to change parts of our process
- Training or professional counselling for the individual

We will maintain regular contact with you to keep you each informed of progress, to provide any reasonable assistance and, as far as possible, to make sure that you are satisfied with the steps that Just Gold has taken.

We will apply the above mentioned clear internal procedure so that all complaints are addressed in a fair, consistent and timely manner.

Unresolved complaints or disputes can be taken up with the local relevant accrediting bodies or authorities.

How to lodge a complaint

Complaints must be done in writing and should be made via email to complaints@justgold.net or you can send your complaint to Just Gold Digital Agency, The Commons QV, 3 Albert Coates Lane, Melbourne VIC 3000.



Client Satisfaction

Just Gold strives for excellence across all our projects. We actively seek client feedback and aim to reach the following targets:

- 100% of projects delivered on time
- 5 star client satisfaction rating

Continuous Improvement

We send all our clients an end-of project feedback survey to collect valuable suggestions for improvement.

Just Gold operates with a philosophy of continuous improvement, we understand there's always something we could be doing better.

That's why we regularly monitor the responses to our feedback form, and implement the feedback into the actions of our Impact Scorecard, under goal 5- "Training & empowering individuals, businesses and communities" in line with UN SDGs 8, 10, and 17.

It is the responsibility of the Project Manager to follow up and ensure feedback is incorporated into Just Gold's continuous improvement goals.



Conflict Of Interest Policy

Overview

Just Gold Digital Agency Pty Ltd (Just Gold) has policies and procedures in place to ensure that any actual, potential and perceived conflicts of interest are identified and managed effectively.

This policy applies to Just Gold Directors, employees, contractors and volunteers, regardless length of service. We expect our team to take reasonable steps to avoid real or apparent conflicts of interest to minimise any adverse impact on our business or the wellbeing of our clients, stakeholders and the broader community.

What is a conflict of interest?

Conflicts arise when two or more competing interests are involved in the same situation. A conflict of interest arises when a person has a relationship with, or interest in, an organisation from which they will receive personal gain as a result of the acceptance or granting of funding, or business relationship with Just Gold.

A conflict of interest exists when it appears likely that an employee or contractor could be influenced, or where it could be perceived that they are influenced, by a personal interest in carrying out their duty and/or when their personal interests conflict with the professional interests of a business.

It is important to note that although there may not be an actual conflict, the perception of a conflict – particularly by external stakeholders – is equally important. Directors, employees, contractors and volunteers must notify of all conflicts and take care to ensure the Conflict Register is up to date.

Importantly, they have an obligation to avoid all financial, business and other relationships which may be opposed to the interests of Just Gold or which may place them in a competitive position with Just Gold. A reference in this policy to a conflict of interest includes a reference to actual, potential and perceived conflicts. These are not mutually exclusive categories.

Roles and Responsibilities

Role	Responsibilities
Board of directors	<ul style="list-style-type: none"> • ensure that no outside or inappropriate influence took part in the decision making; • that any perceived or actual conflicts of interest were notified and managed effectively; • are aware of any declared interests and have documented them effectively; and • are made aware and review any major conflict of interest incidents or events.
CEO	<ul style="list-style-type: none"> • holds responsibility for Conflict of Interest management within the operations of Just Gold; • ensures a system of internal control for Conflict of Interest is upheld and communicated effectively with all employees and Board, Committee members, volunteers and contractors; • ensure conflict of interests are declared and recorded; • manages non-compliance; and • undertake risk assessments as to which conflicts of interest may occur.
Employees (including contractors and sub-contractors)	<ul style="list-style-type: none"> • declare any potential or existing conflicts of interest as, and when, it occurs.

Identifying conflicts

You are required to actively consider whether any actual, potential or perceived conflict of interest arises in the course of your employment or engagement with us.

If you are unsure about whether there could be a conflict, you are required to notify the Just Gold Directors.

Declaring and reporting conflicts

Any commissioning, tendering, financial decisions and contracting should be transparent and have gone through the approved evaluation process to remove any reasonable doubt of bias when viewed by an outside party.

You are required to declare all conflicts that affect you to the Just Gold Directors, including, but not limited to:

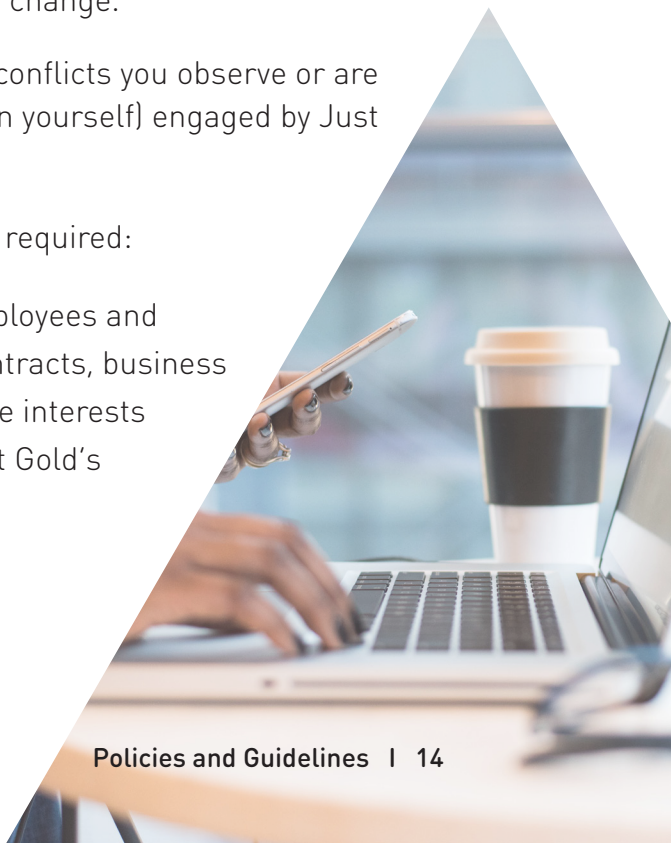
- when making hiring decisions
- conflict between consulting activities and procurement of goods, works or services
- conflict among consulting assignments.


You must notify the Just Gold Directors as soon as possible if relevant circumstances relating to the declared conflicts change.

You are also required to report to the Directors conflicts you observe or are otherwise aware of involving persons (other than yourself) engaged by Just Gold.

To manage conflict of interest, the following are required:

- Directors, Committee members, the CEO, employees and contractors of Just Gold must not enter into contracts, business interests or activities which may conflict with the interests of the Company or may reflect adversely on Just Gold's reputation and business of goodwill.



- 
- Directors, Committee members, the CEO, employees and contractors of Just Gold will not demand, claim or accept money or gifts or other benefits from any person or organisation. This includes both pre- and post-benefits after the fact.
 - All Directors, Committee members, the CEO, employees and contractors are to declare any possible situations which may be viewed as a conflict of interest (real or perceived risk of a conflict, as a reasonable person would consider). The potential conflict may be by family or personal relationships or friends, having existing working relationships from another source. It is Just Gold's opinion that it is better to declare any potential and not have them arise than to have them arise and put the organisation in a difficult position.

Declarations should be made via the declaration form available from the CEO.

Completed signed and dated forms should be returned to the CEO for registration on the conflict register.

The declaration is required to be made each time a new conflict or potential conflict arises and should contain all current conflicts each time it is made.

Register of conflicts

Just Gold Directors are responsible for recording all declared conflicts in our Conflict Register, as well as reported conflicts they consider as constituting conflicts. Access to the information of the full register is confidential.

The register of conflicts includes, but is not limited to, the following information in respect of each case of conflict of interest:

- The duties and personal interests that give rise to the conflict.
- The circumstances which give rise to the conflict.
- When the conflict of interest arose, or in the case of a potential conflict of interest, when the conflict of interest is expected to arise.

- The names of all stakeholders who may be affected by the conflict of interest (such as clients, employees, managers).
- The proposed action taken to effectively manage the conflict.

Managing conflicts

Just Gold Directors are responsible for managing conflicts. They are required to exercise their discretion to determine and implement the most appropriate action for effectively managing the conflict of interest, depending on the circumstances of each case. They must state the reasons for the management action taken, including any subsequent changes to action taken.

Factors to be considered in determining the appropriate management action to be taken include:

- Options to resolve the conflict of interest
- The significance and consequence of the conflict of interest, including likely impact on Just Gold's business and reputation
- The impact of the proposed action on the conflicted person and other key stakeholders
- The extent of the conflicted person's involvement in the relevant decision-making process
- Whether another person is capable of carrying out the conflicted person's duties and, if so, how.

As a guide, action that may be taken to effectively manage the conflict of interest include (but is not limited to) the following:

- No action required —This may be appropriate where, for instance, it has been assessed that there is no actual conflict of interest nor reasonable likelihood of a conflict of interest eventuating, or the conflict relates to a very insignificant matter.



- Forfeit the conflicted interest —The conflict of interest may be resolved by forfeiting the conflicted private interest (for example, if you have received an inducement, you may be required to relinquish it).
- Relieve the employee of their duties — The conflict of interest may be resolved by relieving you of the duty that gives rise to the conflict (for example, temporarily transferring the decision-making responsibility to another person until the conflict of interest no longer exists).

There are a number of other specific measures that may be taken to effectively manage the conflict of interest without necessarily resolving the conflict of interest, including:

- Appointing an independent person to supervise the decision-making process.
- Requiring the conflicted person to leave the room while discussions take place.
- Restricting your access to information.
- Withdrawing you from participating in key or critical decisions.

The Directors will continue to monitor the conflict of interest and, if appropriate (e.g. change of relevant circumstances), change the management action initially taken.

Possible penalties for not adhering

Any Directors, Committee members, the CEO, employees and contractors found to have not declared any conflict of interest, seen to have received unapproved gifts or money or seen to be acting in bias when making an evaluation will be subject to disciplinary action which may result in termination of employment and/or contract.

Credit Card Policy

Vision

Just Gold uses credit cards as part of its method of payment for goods and services.

Credit cards as a method of payment should only be used where direct transfer or setting up a credit account is not relevant or available, such as paying for airline tickets, hotel bookings and restaurant bills.

Credit cards should be a last resort and not as the easiest option. Credit cards will only be issued to individual employees on an assessment of need basis and the need will be reviewed annually. Credit card limits will be assigned to be able to last the reporting period so that topping up balances are very rare.



Just Gold issued credit cards are not to be used for any purpose other than expenses incurred by or committed by the Company. Under no circumstances are credit cards to be used for personal purposes. To do so will incur disciplinary action and may result in the termination of employment.

Additionally, under no circumstances are Just Gold credit cards to be used for cash withdrawals. Cash withdrawals by individuals will result in disciplinary action and may result in the termination of employment.

The holder of the credit card will be responsible and accountable for all entries on the card and therefore the individual must take steps to ensure their card is secure at all times.



On receiving the card, a declaration will be signed by the individual holder of the card declaring their acknowledgement that they are responsible and accountable for all entries on the card apart from renewal or account fees.

The directors are the sole authority as to who will be issued a credit card and what limit will be applied to the credit. The directors will approve the overall limit on the credit card facility with the bank.

The CEO or a relevant director (who is not the card holder) will authorise the credit card for processing.

Procedures

End of Month Reconciliation

It is the responsibility of the card holder to ensure that they have all receipts for the expenditure incurred on their card.

If an invoice, or proof of purchase, is not available (due to loss), then a Statutory Declaration, signed by a commissioner of declarations or Justice of the Peace, will be required for any missing pieces of evidence.

It is the responsibility of the card holder to provide a reconciliation statement within 5 days of the period end recorded on the card.

The accountant(s) will ensure that account statement lists are provided within 3 working days of the statement end period to facilitate the reconciliation process.



It is the responsibility of the card holder to ensure that the relevant approval for all expenditure is received. Expenditure for their area of responsibility should be signed by their manager who is authorised to do so, however expenditure relating to other areas should be authorized by the relevant manager or Chair.

Entering the Credit Cards

At the end of the credit card cycle or period, the CEO will download the transactions into a preformatted excel spreadsheet. The credit card holder will need to complete the description of services, job code, GL code and whether the transaction has GST for each line in the credit card spreadsheet.

Within 3 working days the completed softcopy of the excel spreadsheet is required to be sent back to the accountant for processing. Within 5 working days the hardcopy of the spreadsheet with backup receipts and invoices and authorised by the appropriate authoriser needs to be received by the CEO.

Credit cards will be set up as suppliers where entry will be made as if the credit card statement is an invoice. The payments taken by the bank for the credit card will be journaled to the supplier code. Each month the credit card supplier creditor accounts will be reconciled to ensure their balances are zero.



Customers and Stakeholders Privacy

Overview

Just Gold is committed to the protection and respect of privacy and takes its obligations under the Privacy Act 1988 (Cth) very seriously. This POLICY sets out how we handle personal information we collect and hold plus the practices, procedures and systems we have implemented to ensure compliance.

This policy outlines our commitment to maintaining the confidentiality and security of personal information and manage our systems, practices and procedures in an open and transparent way.

This policy should be read in conjunction with any agreements we may have with you, such as if you have purchased or subscribed to a Just Gold product, as that agreement may set out further assurances in relation to privacy and security.

Collection of Personal Information

Personal Information means any information from which your identity is apparent or can be reasonably ascertained.



This can include your name, address, email address, phone number, gender, age, credit or debit card details and personal information you provide in answers to security log-in questions and survey questions.

We obtain Personal Information in many ways, including directly from you or when you contact us, subscribe to Just Gold, sign up for email news, enter a competition or respond to a survey.

We collect your Personal Information for the primary purpose of providing our services to you: to provide you with news, information, products or services that you request and expect from us, and for purposes necessary or incidental to providing our services.

We may also use your Personal Information for secondary purposes closely related to the primary purpose in circumstances where you would reasonably expect such use or disclosure, for example to provide you with relevant information, including promotions about our products and services or the products and services of our business partners.

We approach the collection, and use, of your information with a focus on our moral compass. We are, at all times, ethical in our approach to you and in the protection and use of your information. As part of our commitment to protecting your privacy

- you will be given the opportunity to opt out from receiving communications from us or from third parties; and



- we will, where appropriate and possible, explain to you why we are collecting the information and how we plan to use it.

You have no obligation to provide any Personal Information. However, if you choose to withhold your Personal Information, we may not be able to provide you with services that depend on the collection and use of that information.

Disclosure of Personal Information

We may disclose your Personal Information in a number of circumstances, including:

- to people who work for us or our suppliers in the provision of our services, including activities such as managing mailing lists, filling orders, processing payments, sending emails and mail-outs, marketing, research and providing support services;
- to third parties, where you consent to the use or disclosure (e.g. where you have elected to receive electronic direct mail from third parties) where required or authorised by law.

Security of Personal Information

We store your Personal Information in a manner which reasonably protects it from misuse and loss and from unauthorised access, modification or disclosure.



We may store your Personal Information with a third-party service provider who has implemented a comparable privacy policy.

We will not transfer your Personal Information overseas to a country that is not subject to a comparable privacy scheme or to an organisation that does not implement privacy obligations at least comparable to the obligations that apply in Australia.

Access to Personal Information

You may request access to Personal Information that we hold about you and you may ask us to correct your Personal Information if you find that it is not accurate, up to date or complete.

We will not charge you for such access or amendment. To protect your privacy and the privacy of others, we will need evidence of your identity before we can grant you access to your Personal Information or amend it.

Cookies and Analytics

When you visit our website, we may collect information about your computer or device (including your IP address, operating system and browser type) and details of your visits to our site (including the date, time and duration of your visit, traffic and location information, which pages you visit etc).

- We may track your response to our advertisements, emails or content and compile statistics about an advertising or email campaign.



- We may share de-identified information with third parties and employ analytic programs, such as Google Analytics, to provide analysis which assists us in understanding the performance of our campaigns. To conduct these or other activities, we or our service providers may use cookies or other forms of local device storage.
- Information collected will be used solely for our internal purposes in managing our services and improving their functionality and reliability and in improving the selection of advertisements or content for groups of individuals.
- This information may be shared, only when anonymised, with third parties to assist them in understanding the performance of advertising in our services.
- We do not use cookies to create a profile of your browsing behaviour on third party sites, we do use aggregate data from third parties to show you relevant, interestbased advertising.

Links to other websites

Our website may contain links to other websites and to social media sites. We are not responsible for the privacy practices of third-party sites. When you follow a link to another website, we advise you to read their privacy policy.

Privacy Enquiries & Complaints

If you suspect any misuse or loss of, or unauthorised access to, your Personal Information, please let us know immediately.

If you have any queries or complaints about a privacy issue or this Privacy Policy please contact us by email: complaints@justgold.net

Supplier Policy

Our values

As an accredited social enterprise and purpose driven organisation, Just Gold is committed to reducing harm and maximising impact through considered and measurable actions.

This policy guides us in who we choose work with, as aligned with Just Gold's vision, values, and Code of Ethics.

Our Priorities

We prioritise suppliers whose mission and values align with our own. This includes when appropriate and possible, prioritising:

- Bcorps, Social Enterprises, Fair Trade organisations, and purpose driven business when choosing new suppliers. By screening suppliers for environmental and social impacts, we benefit people and the planet.
- Those with transparent environmental, social impact, and diversity and inclusion policies already in place. All suppliers to Just Gold Digital Agency must meet, or agree to pursue, social and environmental standards in line with our own commitments. We screen all suppliers for transparent environmental, social impact, and diversity and inclusion policies.
- Suppliers with ownership from underrepresented groups. Our aim is to have 50% of suppliers we engage with be majority owned by people from disadvantaged social groups, including women, LGBTQ+, Aboriginal and Torres Strait Islander, and Culturally and Linguistically Diverse.

Screening

We screen and measure these commitments through our supplier registration form, a mandatory questionnaire all potential suppliers must complete before business is awarded. Just Gold will not engage in business with any organisation known to be involved in harmful environmental or social practices .



Discrimination, Bullying and Harassment Policy

Purpose

Just Gold is committed to providing a safe and healthy work environment in which all team members are treated fairly, with dignity and respect.

Bullying, discrimination and harassment is a risk to the health and safety of the workplace. It is unacceptable and will not be tolerated by Just Gold.

This policy outlines Just Gold's commitment to a safe workplace and is aimed at ensuring, so far as it reasonably can, that employees and contractors are not subjected to any form of bullying, discrimination and harassment while at work.

It also details the legal responsibilities of Just Gold employees and contractors in relation to preventing bullying, discrimination and harassment in the workplace.

Scope

This policy covers all employees of Just Gold (whether full-time, part-time or casual and all persons performing work at the direction of, in connection with, or on behalf of Just Gold (for example contractors, subcontractors, agents, consultants, and temporary staff) (collectively team members).



This policy extends to all functions and places that are work related, for example, work lunches, conferences, Christmas parties and functions.

Principles

Everyone at the workplace has a legal, as well as moral responsibility, to prevent bullying, discrimination and harassment from occurring.

Under relevant health and safety legislation, Just Gold's primary duty is to eliminate or minimise, as far as reasonably practicable, the risks to health and wellbeing in the workplace. This duty includes the implementation of strategies to prevent workplace bullying, discrimination and harassment.

Team members are required to take reasonable care for their own health and wellbeing, as well as that of others at the Company. They are required to also comply with any reasonable instruction given by Just Gold.

What is Workplace Bullying, Discrimination and Harassment?

Workplace bullying, discrimination and harassment is repeated and unreasonable behaviour directed towards a team member, or a group of team members, that creates a risk to health and safety . It includes both physical and psychological risks and abuse .

These behaviours can take many different forms, from the obvious to the subtler:

- repeated hurtful remarks or attacks, or making fun of your work or you as a person (including your family, sex, sexuality, gender identity, race or culture, education or economic background;



- sexual harassment, particularly stuff like unwelcome touching and sexually explicit comments and requests that make you uncomfortable;
- excluding you or stopping you from working with people or taking part in activities that relate to your work;
- playing mind games, ganging up on you, or other types of psychological harassment;
- intimidation (making you feel less important and undervalued);
- giving you pointless tasks that have nothing to do with your job;
- giving you impossible jobs that can't be done in the given time or with the resources provided;
- deliberately changing your work hours or schedule to make it difficult for you
- deliberately holding back information you need for getting your work done properly
- pushing, shoving, tripping, grabbing you in the workplace
- attacking or threatening with equipment, knives, guns, clubs or any other type of object that can be turned into a weapon; and
- initiation or hazing - where you are made to do humiliating or inappropriate things in order to be accepted as part of the team.

The above examples do not represent a complete list of bullying, discrimination and harassment behaviours. They are indicative of the type of behaviours which may constitute bullying, discrimination and harassment and are totally unacceptable at Just Gold.

A single incident of unreasonable behaviour does not usually constitute bullying, discrimination and harassment. However, it should not be ignored as it may have the potential to escalate. Your safety and wellbeing is important.



A person's intention is irrelevant when determining if bullying, discrimination and harassment has occurred. Bullying, discrimination and harassment can occur unintentionally, where actions which are not intended to victimise, humiliate, undermine or threaten a person actually have that effect.

Bullying, discrimination and harassment in the workplace is harmful not only to the target of the behaviour but also damages Just Gold's culture and reputation. It is unacceptable and will not be tolerated.

Some types of workplace bullying, discrimination and harassment are criminal offences. If you have experienced violence, assault and stalking you should report it directly to the police.

How bullying can affect your work

If you are being bullied, harassed or discriminated against at work, you might:

- be less active or successful
- be less confident in your work
- feel scared, stressed, anxious or depressed
- have your life outside of work affected, e.g. study, relationships
- want to stay away from work
- feel like you can't trust your employer or the people who you work with
- lack confidence and happiness about yourself and your work
- have physical signs of stress like headaches, backaches, sleep problems



What does not constitute Workplace Bullying, Discrimination or Harassment?

Managing staff does not constitute bullying, discrimination or harassment, if it is done in a reasonable manner .

Managers have the right, and are obliged to, manage their staff . This includes directing the way in which work is performed, undertaking performance reviews and providing feedback (even if negative) and disciplining and counselling staff .

Examples of reasonable management practices include:

- setting reasonable performance goals, standards and deadlines in consultation with workers and after considering their respective skills and experience
- allocating work fairly
- fairly rostering and allocating working hours
- transferring a worker for legitimate and explained operational reasons
- deciding not to select a worker for promotion, following a fair and documented process
- informing a worker about unsatisfactory work performance in a constructive way
- and in accordance with any workplace policies or agreements
- informing a worker about inappropriate behaviour in an objective and confidential way
- implementing organisational changes or restructuring, and performance management processes .



Steps to prevent Workplace Bullying, Discrimination or Harassment

Just Gold will take all reasonable steps to prevent bullying, discrimination and harassment through a risk management process . This process includes:

- identification of risk factors- these are things and situations which could contribute to bullying, discrimination and harassment such as the way in which staff are managed, or organisational change such as redundancies;

Just Gold will take all reasonable steps to prevent bullying, discrimination and harassment through a risk management process . This process includes:

- identification of risk factors- these are things and situations which could contribute to bullying, discrimination and harassment such as the way in which staff are managed, or organisational change such as redundancies;
- assessment of the likelihood of bullying, discrimination and harassment occurring from the risk factors identified and their potential impact on the workers or workplace;
- eliminating the risks, as far as reasonably practicable, or controlling, or minimising, them as far as reasonably practicable;
- reviewing the effectiveness of the control methods put in place and the process generally; and
- training workers about bullying, discrimination and harassment, how to deal with it and its impact on the workplace .



Reporting an incident

When you are being bullied or discriminated against it's important that you know there are things you can do and people who can help. You have the right to be in a safe workplace free from discrimination, violence, harassment and bullying.

If you feel that you have been bullied or discriminated against, you should not ignore it.

- Just Gold has a process for making a complaint and resolving disputes, which might include a warning, requiring the perpetrator to have counselling, a mediation process, or even firing the bully if the situation warrants.
- The person to talk to in the first instance is your supervisor/line-manager, unless they are the perpetrator.
- Keep a diary. Documenting everything that happens, including what you've done to try stopping it. This can help if you make a complaint.
- Get support from someone you trust.
- If you feel safe and confident, you can approach the person who is bullying, harassing or discriminating against you and tell them that their behaviour is unwanted and not acceptable. If you are unsure how to approach them, you might be able to get advice from a colleague or line-manager.
- If the situation has not changed after complaining to your line-manager, or if there is to at work you can get outside information and advice.



Bullying may also be discrimination if it is because of your age, sex, pregnancy, race, disability, sexual orientation, religion or certain other reasons.

Sexual harassment and racial hatred are also against the law.

We all have a moral responsibility to help create a positive, safe workplace. If you or someone in your workplace is experiencing harassment or bullying, there are steps you can take to solve it.

Breaches of this policy

Just Gold takes very seriously its commitment to providing a safe and healthy work environment, free from bullying, discrimination and harassment. All employees and contractors are required to comply with this policy.

If an employee breaches this policy, they may be subject to disciplinary action. In serious cases this may include termination of employment. Agents and contractors (including temporary contractors) who are found to have breached this Policy may have their contracts with Just Gold terminated or not renewed.

If a person makes a false complaint, or a complaint in bad faith (e.g. making up a complaint to get someone else in trouble, or making a complaint where there is no foundation for the complaint), that person may be disciplined and or have their employment termination.



Diversity & Inclusion Policy

Vision


Just Gold recognises its talented and diverse workforce as a key competitive advantage. Our ongoing success is a reflection of the quality and skill of people working with, and for, Just Gold. We are committed to seeking out and retaining the finest human talent to ensure ongoing engagement and performance.

Diversity management benefits individuals, teams, and the organisation as a whole, and Just Gold's stakeholders and customers. We recognise that each employee brings their own unique capabilities, experiences and characteristics to their work. We value such diversity at all levels of the organisation in all that we do.

Just Gold believes in treating all people with respect and dignity.

We strive to create and foster a supportive and understanding environment in which all individuals realise their maximum potential within the Company, regardless of their differences . We are committed to employing the best people to do the best job possible .

We recognise the importance of reflecting the diversity of our customers, stakeholders and community in our workforce . The diverse capabilities that reside within our talented workforce, allows Just Gold to anticipate and fulfil the needs of our diverse community, providing high quality strategy and services .



Just Gold is diverse along many dimensions. Our diversity encompasses differences in ethnicity, gender, language, age, sexual orientation, religion, socio-economic status, physical and mental ability, thinking styles, experience, and education.

We believe that the wide array of perspectives that results from such diversity promotes innovation and business success. Managing diversity makes us more creative, flexible, productive and competitive.

Recruitment

Just Gold recruits people from all backgrounds and experiences. We believe this will provide the Company, and our customers, with valuable knowledge and understanding of different diversities

Community Engagement

Just Gold recognises that there are distinct demographic groups that have long been disadvantaged.

We recognise that racism, ageism, sexism and other forms of discrimination are problems both for our organisation and society as a whole.

Just Gold is committed to tackling cultural stereotypes both within and outside our organisation.

Our Complaints and Compliment Policy and the Harassment and Bullying Policy provide procedures for any type of discrimination or harassment combined with follow-up steps to prevent future incidents.

Editorial Guidelines

Just Gold Digital Agency Ltd (Just Gold), including our publications, social media and digital channels, and related entities, is committed to the fundamental journalistic principles of honest, fairness, independence and respect for the rights of others.

We are guided by the Media Entertainment and Arts Alliance Journalist Code of Ethics¹ and comply with the Australian Press Council's advisory guidelines for print and digital media outlets.

We abide by the Australian Press Council's general principles of:

Accuracy and clarity

- Ensure that factual material is accurate and not misleading and is distinguishable from other material, such as opinion.
- Provide a correction or other adequate remedial action if published material is significantly inaccurate or misleading.

Fairness and balance

- Ensure that factual material is presented with reasonable fairness and balance, and that expressions of opinion are not based on significantly inaccurate factual material or omission of key facts.
- Ensure that where material refers adversely to a person, a fair opportunity is given for subsequent publication of a reply if that is reasonably necessary to address a possible breach.

¹ For a copy of the Code of Ethics, please see: <https://www.meaa.org/meaa-media/code-of-ethics/>



Privacy and avoidance of harm

- Avoid intruding on a person's reasonable expectations of privacy, unless doing so is sufficiently in the public interest.
- Avoid causing or contributing materially to substantial offence, distress or prejudice, or a substantial risk to health or safety, unless doing so is sufficiently in the public interest.

Integrity and transparency

- Avoid publishing material which has been gathered by deceptive or unfair means, unless doing so is sufficiently in the public interest.
- Ensure that conflicts of interests are avoided or adequately disclosed, and that they do not influence published material.

Advertorials

Just Gold is committed to disclosing and clearly identifying any editorial content that is published under a commercial arrangement with an advertiser, promoter or sponsor of goods and/or services.

Complaints

If you have a complaint about our editorial content, please refer to our complaints policy. Complaints should be made via email to complaints@justgold.net or sent to:

Just Gold Digital Agency
3 Albert Coates Lane, Melbourne
VIC 3000



FOR THE
WORLD

Environmental Sustainability Policy

Introduction

The Earth's environment is under severe stress from uncontrolled human activity, threatening the survival of our society and the performance of Just Gold's mission. The United Nations states that climate change is one of the defining challenges of our time, noting that:

From shifting weather patterns that threaten food production, to rising sea levels that increase the risk of catastrophic flooding, the impacts of climate change are global in scope and unprecedented in scale. Without drastic action today, adapting to these impacts in the future will be more difficult and costly.¹

Just Gold knows that we must work to preserve the environmental sustainability of the planet, at all levels of its operations – in its own practice, as a participant in a community of practice, and as a participant in the Australian social discourse.

¹ For further information, please see: <https://www.un.org/en/sections/issues-depth/climate-change/>



Just Gold aspires to minimise our impact on the environment and maximise the effective use of resources. We strive to achieve this by increasing communication and awareness of our efforts in accordance with this policy and fostering responsible environmental behaviour amongst staff, volunteers, and users at all levels.

Just Gold is committed not only to complying with applicable law in all of its operations but to minimise risks and impacts through the development of robust and documented systems to implement, measure, monitor, and disseminate excellent environmental performance both within its operations and to the broader community.

Purpose

This Environmental Sustainability Policy aims to integrate a philosophy of sustainable development into all the organisation's activities and to establish, and promote, sound environmental practice in all our decisions and operations.

Policy

Just Gold commits itself to minimising our impact on our environment through:

- Providing a safe and healthy workplace



- Having an environmentally sustainable aware culture, where responsibility is assigned and understood through ongoing discussion, education and leading by example.
- Being an environmentally responsible neighbour in our community through mindful practices.
- Leasing space in shared workspaces in 6 star buildings that minimise our environmental footprint.
- Operate a paperless office, with digital first procedures.
- Participating in broader community efforts to improve environmental protection and understanding.
- Taking steps to improve environmental performance continually by considering and reviewing our environmental impact at the beginning and completion of each project to ensure that we seek to continually improve.
- Conducting rigorous audits, evaluations, and self-assessments of the implementation of this policy on an annual basis.
- Working with suppliers who promote sound environmental practices; and
- Enhancing awareness among our employees, volunteers, and users – educating and motivating them to act in an environmentally responsible manner.
- Considering sustainability opportunities when purchasing consumables.
- Conserving natural resources by reusing and recycling wherever possible.
- Using, in our own operations, processes that do not adversely affect the environment.
- Ensuring the responsible use of energy throughout the organisation by reducing energy use and purchasing green/renewable energy, whenever possible.



Our Offices

Sustainability and environmental consciousness are part of the building blocks that make up The Commons, Just Gold's chosen Coworking space. We chose to work in The Commons because they are a certified Bcorp, and have implemented a list of great environmental policies and practices including:

- Investing in carbon offsets and 100% renewable energy with solar and wind technologies.
- Actively working towards carbon neutrality
- Recycling & Paper Bins
- No single-use plastic within all our locations
- Biophilic design and indoor plants to absorb more CO2
- Encourage alternative modes of transportation
- Coffee ground recycling
- Locally sourced supplies
- Events and educational resources for sustainability
- Recycled printer cartridges
- LED lights that work on sensors

Working from Home

We encourage work practices and processes that enable flexibility, while ensuring our operational needs are met and our projects are delivered on time.



Just Gold expects that remote working arrangements should not impact our commitment to reducing our carbon footprint. This policy aims to assist staff and stakeholders with making environmentally conscious choices when working for, or with, Just Gold.

Practices

When working remotely Just Gold suggests you follow the below practices to reduce environmental impact.

- Temperature- for energy efficiently it is recommended you keep the temperature between 25 to 27 degrees for cooling in summer, and around 18 to 20 degrees for heating in winter.
- Screen brightness- Reduce power use by keeping your screen brightness set at a moderate level.
- Turn off and unplug all electronic devices at end of day. This helps save the planet, your electricity bill, and is great for setting a work life balance.
- Just Gold is a digital first, paperless agency, however if you need to use paper in your home you should reach for recycled, natural products.

Products

- Bamboo office supplies
- Recycled paper
- LED lights



Suppliers

- Consider switching your super fund to a sustainable investment portfolio. Ethical Super, Future Super and UniSuper have some of the best available options.
- Always aim to buy local, it reduces carbon miles and supports the economy we live and work in. Locally-sourced suppliers Just Gold uses include- Who Gives a Crap toilet paper, Almo Milk, Thank You hand soaps, and Kua coffee.
- Karst Stone Paper- A Bcorp creating sustainable notepads, planners, and office supplies.
- OnyaLife- A Bcorp producing plastic-free alternative lunchboxes, coffee cups, and water bottles.

Reduction Targets

- Just Gold is committed to reducing our environmental impact through the previously mentioned policies and procedures. This policy is regularly reviewed to ensure guanidine remains relevant.
- By end of financial year 2021/22 Just Gold aims to have increased use of environmentally friendly suppliers to 50%.
- Just Gold aims to increasingly promote environmentally friendly practices, products and suppliers across our social media presence and use our reach to advocate for carbon reduction.



Production Guidelines

All contractors working on Just Gold productions must completed an induction and ensure they are familiar with Just Gold's Code of Conduct and policies and guidelines.

Code of Conduct

We have adopted the Victorian Screen Industry Code of Conduct¹ to ensure we comply with industry best practice for film shoots.

The Code provided a comprehensive guide to all aspects relating to film production and the expectations and obligations of crew members. It includes a handy checklist provides a summary of some key activities that need to be considered and actioned as early as possible in the production process, including:

- relevant permit applications and authorisations.
- insurances and a relevant safety plan to ensure the safety of employees and all other parties and compliance under work health and safety laws
- advance notification of proposed filming to activities to traders, residents and other interested parties
- relevant permits and compliance for working with children or animals.

¹ For further information, please see: https://www.film.vic.gov.au/images/uploads/Code_of_Conduct_-_PDF_for_web.pdf

- ensuring crew are qualified to carry out the duties they have been employed to do and are aware of their responsibilities under the law and within the context of the code
- non-residents right's to work in Australia.

Filming on location, be it in the public domain or on private property, places a special obligation on every individual engaged by or connected with JG screen production, to be courteous, considerate and accommodating to the needs of others in the vicinity of any screen production activity.

COVID-19 Safety measures

- While working on a production on location or in studios, Just Gold follows the latest Australian Screen Production Industry's COVID-Safe Guidelines¹ to minimise the risks of exposure.
- Anyone working on or participating in a Just Gold shoot must follow social distancing measures and safety precautions, as instructed, and outlined in these Guidelines.

¹ Please see <https://www.screenaustralia.gov.au/covid-19-support> for further information.





Risk Management Policy

Responsibilities

It is the responsibility of the Directors, with the assistance of the Company Secretary and the CEO to carry out ongoing risk management analyses of Just Gold, including specific projects, and to take appropriate measures to manage and mitigate risk.

Purpose

This Just Gold Risk Management Policy describes our commitment to and objectives around managing risks. It explains how responsibility for managing risks is distributed between officers and committees of the organisation.

Scope

Just Gold manages our risk through an effective risk management framework and relevant processes to mitigate potential negative outcomes and to better realise sustainable opportunities present in the organisation's operations.



Just Gold

- recognises risk management as an integral part of good management practice and decision making;
- creates and maintains a risk management environment that enables Just Gold to deliver high quality services and meet performance objectives in line with our principle of seeking continuous improvement with focus on positive social change
- ensures resources and operational capabilities are identified and deployed responsibly and effectively.
- demonstrates the application of the risk management process of identifying, analysing, evaluating and treating risks, as detailed in the Risk Management Standard, AS/NZS ISO 31000:2009¹.

It is the policy of Just Gold that our Risk Management Framework provides an effective process for the identification, analysis and management of both negative and positive impacts on physical, social and economic capital.

This policy will support sustainability and safeguard assets, infrastructure, people, finances and reputation.

¹ Please refer to "Risk management — Principles and guidelines" <https://www.iso.org/standard/43170.html>



How we approach risk

- Our risk appetite indicates the amount of risk exposure, or potential adverse impact from an event that Just Gold is willing to accept in pursuit of its objectives. Once the risk appetite threshold has been breached, risk management controls and actions are required to bring the exposure level back within the accepted range.
- Just Gold has a level of risk appetite that it tolerates which is low, medium and high risks as detailed in the below table. We use this approach when determine and analysing risks, at a Company and project level.

Risk Rating	Minimum Treatment required	Description
Very High Risk	Reject and avoid or mitigate	Immediate action required in consultation with a Director to either avoid the risk entirely or to reduce the risk to a low, medium or high rating
High risk	Accept and mitigate	These risks need to be mitigated with actions as required and managers need to be assigned these risks
Medium risk	Accept	Manage by specific monitoring or response procedures
Low risk	Accept	Manage by routine procedures

Responsibilities

It is the responsibility of the CEO to ensure that:

- a comprehensive risk matrix is in place for the Company that takes into account the risk appetite of the Directors;
- effective risk management procedures are in place, applicable to all relevant areas of risk;
- risk management procedures are reviewed annually or following a significant event;
- recommendations arising out of the risk management process are evaluated and, if necessary, implemented; and
- Directors, Committee members, employees, contractors and volunteers are aware of all applicable risks and familiar with Just Gold's risk management procedures.
- risk management checklists are in place and are reviewed regularly to ensure that no risks have been overlooked or have ceased to be relevant;
- procedures are in place to avert the risk or, if that is not possible, to mitigate its impact; and
- copies of up-to-date risk management checklists are kept in a central Risk Management Register.

Managing Risk

1. The CEO has the ultimate responsibility for ensuring that risk is managed across Just Gold.
2. The CEO and Directors are responsible for monitoring the corporate implementation of the Risk Management Policy with reference to the Risk Appetite.

3. The Director, Emerging Media and Social Impact is responsible for overseeing the development and maintenance of the Occupational Health and Safety culture, framework and systems throughout Just Gold, including training and awareness, monitoring corporate risk management performance and management reporting.

4. The CEO and Directors are responsible for reviewing Just Gold's approach to risk, in particular, risks associated with the core activities of work, specifically individual projects.

This includes, but is not limited to, the overall risk management plan, ensuring that periodic assessments are undertaken, control measures are established and their effectiveness is regularly monitored and reviewed.

5. Each Project Manager/Contractor is accountable for implementing the risk management policy through appropriate actions in their area of responsibility.

6. All employees, consultants, contractors and service providers are responsible for applying risk management practices in their area of work and ensuring that Just Gold management are aware of all types of risks. This extends to recommending suitable plans to manage risks and obtaining appropriate approval prior to action.

Specifically, the CEO shall carry out risk assessment, involving:

- identifying the risks attached to every element of the operation and the likelihood of that risk eventuating;
- identifying practices to avert those risks;
- identifying practices to mitigate the effects of those risks; recording those risks, those precautions and those remedies in the form of deliverable checklists;



- ensuring Just Gold has available to it all relevant risk management checklists; and
- undertaking reviews of Just Gold's risk profile annually, including identification of additional risks.

Responsibilities of employees, contractors and volunteers

It is the responsibility of all employees, contractors and volunteers to:

- familiarise with Just Gold's risk management procedures;
- actively observe of those risk management procedures; and
- inform the CEO if they become aware of any risk not covered by existing procedures.

Legislative context

The Australian and New Zealand and International Risk Management Standard AS/NZS ISO 31000:2009.¹

Definitions

Risk Management is the coordinated activities to direct and control an organisation with regard to risk. It relates to all aspects of the organisation's operations and practice.

Risk is the effect of uncertainty on objectives. It is measured in terms of a combination of the likelihood of an event and its consequence.

¹ For further information, please see: <https://www.iso.org/standard/43170.html>



Social Media Policy

Introduction

The Directors, CEO and employees of Just Gold are committed to ensuring that its engagement activities with third parties are carried out in a way that represents Just Gold appropriately and supports the strategic objectives of the Company, including engagement with customers, government agencies, private companies, the community, politicians and other stakeholders.

This policy sets out the principles and methods to be used for engagement.

Purpose

The purpose of this policy is to establish the framework and guidelines for engagement between the Just Gold and third parties.

This policy aims to:

- Ensure all Just Gold engagement activities align with the principles and Moral Compass of Just Gold.
- Support the development of strong relationships with customers, key stakeholders and partners.
- Guide effective engagement activities with customers and other stakeholders.



- Guide staff on their roles and responsibilities in engaging with third parties.
- Provide tools and guidelines to manage these activities.

This policy applies to all Just Gold personnel at all levels of the Company.

Roles and responsibility

Role	Responsibility
Directors	The Directors provide oversight and strategic direction to guide the development of these arrangements and the strategic priorities that they reflect.
CEO	The CEO is the media spokesperson. Other staff may be invited by the CEO to undertake media activity from time to time.
Employees and contractors	All staff are responsible for following this policy or escalating activities to the appropriate team member as required.

Principles

All Just Gold engagement activities should follow these principles:

- Reflect Just Gold strategic objectives and policy positions.
- Respect audience knowledge and perspectives.
- Be approved by the CEO or delegated officer.
- Use a professional tone and be clear, concise and avoid jargon where possible.



Forms of Engagement

Events

Just Gold delivers a number of events each year. All events should be guided by the following principles:

- Reflect Just Gold principles and Moral Compass.
- Respect audience knowledge and perspectives
- Be relevant, unbiased, evidence based and timely

Website

The Just Gold website provides information about our Company, our projects and programs, news, funding, jobs and events.

The website is managed by the CEO. Content on the website must be approved by the CEO and directors before publication.

Website content differs from published material in that research has shown people scan pages rather than reading them word for word, therefore web content should be guided by the following principles:

- Aim to meet WCAG 2.0 guidelines for website accessibility.
- Use plain English and short sentences.
- Aim for 50% less text than conventional publications.
- Use bulleted or numbered lists to display key points.
- Put the most important information first.
- Key words should be tagged to facilitate search engine optimisation



Publications

All publications require the approval of the CEO prior to release.

E-bulletins and other promotional emails

Just Gold sends a variety of e-Bulletins and promotional emails to its customers and stakeholders.

Each of these has a specific purpose, for example to promote events, but all are guided by the following principles:

- Information in the emails should be of interest and relevance to the recipients; and
- Activity must be carried out in accordance with the Australian Privacy Principles with reference to the Just Gold Editorial Complaints Policy and the Just Gold Customers and Stakeholders Privacy Policy.

Social Media

All material published to these platforms must be approved by the CEO before publication.



Formal correspondence

Formal or official correspondence is correspondence which:

- Makes a commitment on behalf of the Just Gold, e.g. initiates or agrees to a contract, partnership, or invitation; or
- Makes representation on behalf of the Just Gold, e.g. outlines the Company's position on an issue to a stakeholder.

Due to its nature such correspondence may impact the Just Gold's reputation, therefore should be prepared in accordance with the following guidelines:

- Be issued on Just Gold letterhead;
- Utilise formal language and correct addressing conventions;
- Be sent via email followed by a hardcopy in the post; and
- Be signed by the CEO.

Communication Plan

An annual communication plan will be developed for endorsement. It comprises:

- An analysis of current strengths, weaknesses, opportunities and threats in Just Gold's engagement with key partners.
- A stakeholder and customer engagement matrix.
- Detailed plans for actions to address opportunities and challenges, including measures of success.

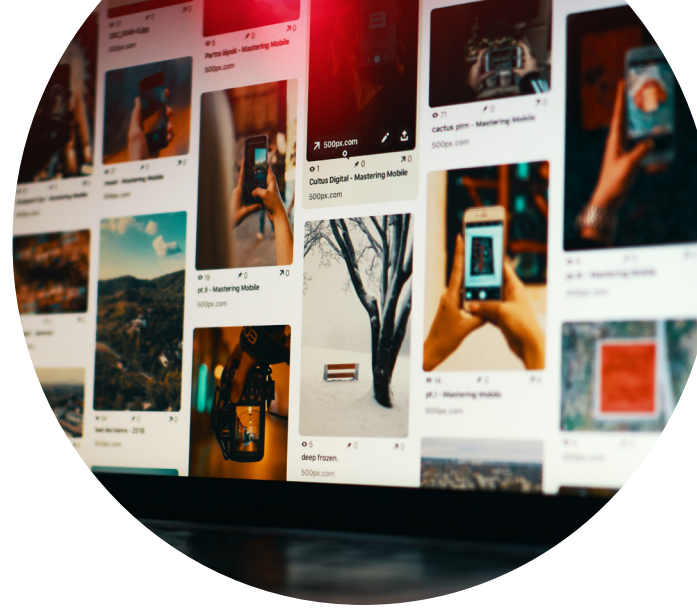


Responding to a crisis

A media crisis at Just Gold includes, but is not limited to, risks associated with socialmedia and general media.

A social media crisis may include the following:

Type	Description	Action
Human error	An employee unintentionally uploads a post (i.e. personal photo, opinion etc) which does not meet the Company's social media usage guidelines.	<ul style="list-style-type: none">• Post to be recorded (screenshot)and deleted by Communications Coordinator/ Events & Communications Coordinator.• Employee to be informed of error. CEO to be notified.• Post to be recorded (screenshot)and deleted by Communications Coordinator/ Events & Communications Coordinator.• Employee to be informed of error. CEO to be notified.



Privacy settings

Social media accounts may fall prey to hackers by uploading fraudulent posts to followers or misconstruing the Company's message

- Post to be recorded (screenshot) and deleted by CEO.
- Breach to be reported to social media platform.
- Social media post to be made notifying followers of the hack and that steps have been taken to rectify the issue, with the social media platform notified.

Defamatory posts

Discussions on social media accounts must remain within acceptable boundaries regarding confidentiality and privacy, relevance to the topic and discriminatory and offensive content.

Occasionally social media posts from followers and other users may fall outside these boundaries.

Post to be recorded (screenshot) and deleted by CEO. The person who posted the comment to be informed that the post has been removed.

For Facebook, the following script to be used in a direct message:

I am writing to you to let you know that I have removed your comment on our Facebook page.

Please refer to the Just Gold Facebook Guidelines in the “About” section under “Company Overview”.

If you require further clarification, please do not hesitate to contact me.

For Twitter and LinkedIn, the following script to be used in a direct message:

I am writing to you to let you know that I have removed your comment on our page. Posts must remain within Just Gold’s acceptable boundaries.

If you require further clarification, please do not hesitate to contact me.





Wellbeing Policy

Goals

To build and maintain a workplace environment and culture that supports healthy lifestyle choices and wellbeing for the Just Gold team.

To increase knowledge and awareness of health and wellbeing issues and healthy lifestyle behaviours.

To facilitate the team's active participation in a range of initiatives that support health and wellbeing.

Objectives

- To encourage the team to be more physically active by making provisions in the workplace for activity opportunities (including reducing sitting time where relevant and practical).
- To provide healthy eating choices in the workplace through addressing healthy physical settings, such as food storage and preparation; food access and supply; and education.
- To promote a smoke-free workplace environment.
- To promote staff social and emotional wellbeing through workplace practices and policies, including encouraging the use of the Employee Assistant Program when required.
- To provide access to information and resources that increase worker knowledge and awareness around key health areas, including the risk associated with alcohol consumption.



Responsibility

Everyone in the workplace has a responsibility to promote and maintain a healthy workplace. Team members are actively encouraged to:

- Understand this policy and seek clarification from management when required.
- Consider this policy while completing work-related duties and at any time while representing the Company.
- Support fellow team members in their awareness of this policy.
- Support and contribute to providing a safe, healthy and supportive environment for all workers.

The CEO and Directors have responsibility to:

- Ensure all team members are made aware of this policy.
- Actively support and contribute to the implementation of this policy, including its goals and objectives.
- Manage the implementation and review of this policy

Whistleblower Policy

Objectives

Just Gold is committed to the highest standards of conduct and ethical behaviour in all our activities, and to promoting and supporting a culture of honest and ethical behaviour, compliance and good corporate governance.

Directors, employees, volunteers and contractors are expected to report any instances of suspected unethical, illegal, fraudulent or undesirable conduct involving Just Gold business.

Just Gold will ensure that those persons who make a report shall do so without fear of intimidation, disadvantage or reprisal. .

Aims

The aim of this policy is to:

1. encourage the reporting of matters that may cause harm to individuals or financial or non-financial loss to Just Gold or damage to its reputation;
2. enable Just Gold to deal with reports from whistleblowers appropriately, will protect the identity of the whistleblower and provide for the secure storage of the information provided;
3. establish the policies for protecting whistleblowers against reprisal by any person internal or external to Just Gold;
4. help to ensure Just Gold maintains the highest standards of ethical behaviour and integrity.



Reporting of concerns

Where an individual linked to the Just Gold believes in good faith on reasonable grounds that any other member of the Board, Committee, employee, contractor or volunteer has breached any provision of the law or has behaved in a manner that is in conflict with Just Gold policies or unethical in any way, that person must report their concern to:

- their supervisor: or, if they feel that their supervisor may be complicit in the breach,
- the CEO: or, if they feel that the CEO may be complicit in the breach
 - another director;

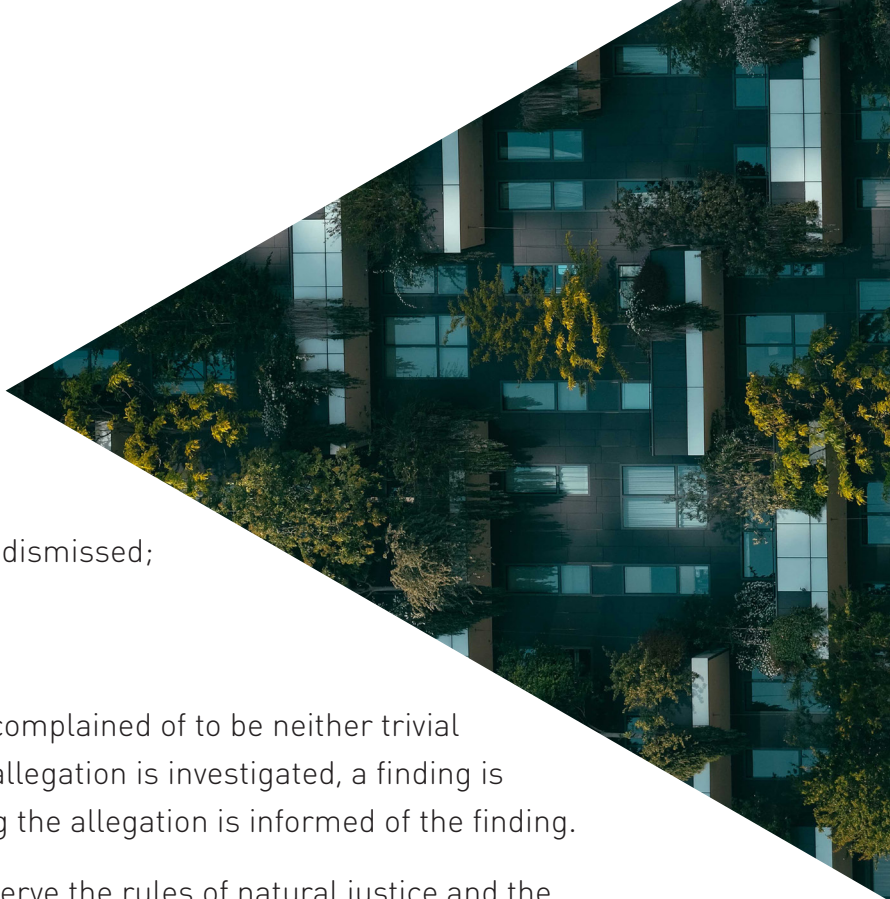
- a person or office independent of the Company nominated by the Company to receive such information, or
- the duly constituted authorities responsible for the enforcement of the law in the relevant area, such as the Victorian Police Service.

The person making their concern known shall not suffer any sanctions from Just Gold

- on account of their actions in this regard provided that their actions
- are in good faith, and
- are based on reasonable grounds, and
- conform to the designated procedures.

Any person within Just Gold to whom such a disclosure is made shall:

- if they believe the behaviour complained of to be unquestionably trivial or fanciful, dismiss the allegation and notify the person making the allegation of their decision in writing.



They must also keep a written record of the complaint and the reasons that the complaint was dismissed;

OR

- if they believe the behaviour complained of to be neither trivial nor fanciful, ensure that the allegation is investigated, a finding is made, and the person making the allegation is informed of the finding.

Any such investigation shall observe the rules of natural justice and the provisions of procedural fairness.

What is reportable conduct?

A person may make a report under this policy if they believe that a Board, Committee, employee or volunteer, contractor, supplier, tenderer or other person who has business dealings with Just Gold has engaged in conduct (Reportable Conduct) which:

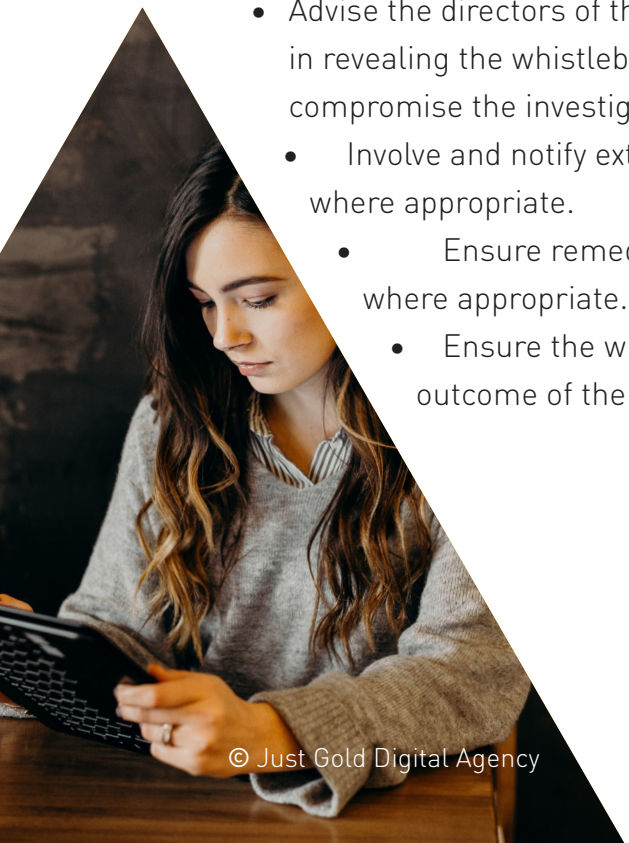
- is dishonest, fraudulent or corrupt activity;
- is illegal activity (such as theft, drug sale or use, violence, harassment or intimidation, criminal damage to property or other breaches of state or federal law);
- is unethical or in breach of Just Gold policies (such as dishonestly altering company records or data, adopting questionable accounting practices or willfully breaching other policies or procedures);
- is potentially damaging to Just Gold such as unsafe work practices, environmental damage, health risks or abuse of Just Gold's property or resources;
- amounts to an abuse of authority;

- may cause financial loss to Just Gold or damage its reputation or be otherwise detrimental to Just Gold's interests;
- involves harassment, discrimination, victimisation or bullying; or
- involves any other kind of serious impropriety.

Whistleblower process

When a whistleblower disclosure is received the CEO will:

- Appoint an appropriate person to look after the welfare of the whistleblower (Whistleblower Protection Officer).
- Appoint an appropriate person from either inside or outside of Just Gold to investigate the allegations in the disclosure.
- Ensure the investigation is conducted in a fair and timely manner and confidentiality is maintained.
- Ensure there are no reprisals, harassment, discrimination, or victimisation of the whistleblower.
- Ensure that all practicable steps are taken to protect the identity of the whistleblower where the whistleblower has sought anonymity.
- Advise the directors of the whistleblower disclosure but exercising discretion in revealing the whistleblower's identity and the level of detail where it may compromise the investigation.
- Involve and notify external parties, such as police or another agency, where appropriate.
 - Ensure remedial action is taken, including disciplinary action, where appropriate.
 - Ensure the whistleblower is provided with information on the outcome of the investigation where reasonably practicable.



Protection of whistleblowers

Just Gold will take all practicable action to ensure a whistleblower is not disadvantaged by having made a report of misconduct in good faith. This includes protection from:

- Any form of harassment or discrimination.
- Current or future bias.
- Dismissal or demotion if they are an employee.

A Whistleblower Protection Officer will be appointed to look after the whistleblower's interests. Where a whistleblower believes that they have been victimised, disadvantaged or discriminated against, they have a right of review by the Whistleblower Manager.

Just Gold has no power to offer any person immunity against criminal prosecution.

Management of the person/s against whom the disclosure has been made

Just Gold recognises that persons against whom disclosures are made and investigated under this protocol must also be supported during the handling and investigation of disclosures. Just Gold will afford procedural fairness to the person against whom a disclosure has been made as well as making EAP accessible to the person(s).

What a whistleblower needs to disclose:

Before making a disclosure through the whistleblower program the employee must have first satisfied themselves that there is reasonable evidence to justify their concerns. The more evidence they can provide the greater Just Gold's ability to investigate.

The individual should be able to provide information on all or most of the following:

- what/how they believe the misconduct has occurred; and
- at least some of the people involved in the alleged misconduct; and
- when the alleged conduct occurred.

Anonymity

When making a whistleblower report the employee can remain completely anonymous, although they should be aware that this may preclude Just Gold's ability to properly investigate the matter and prevent Just Gold being able to provide feedback to the employee with respect to the outcome of the investigation.

Alternatively, the whistleblower can provide their name and contact details to the Whistleblower Manager and request that their details be kept confidential. Where a whistleblower requests anonymity, Just Gold will, as far as reasonably possible, protect the person's identity unless they are legally required to disclose it.

Information received from a whistleblower will be held in the strictest confidence and will only be disclosed to a person not connected with the investigation if:

- The whistleblower has been consulted and consents in writing to the disclosure; or
- Just Gold is legally required to do so.



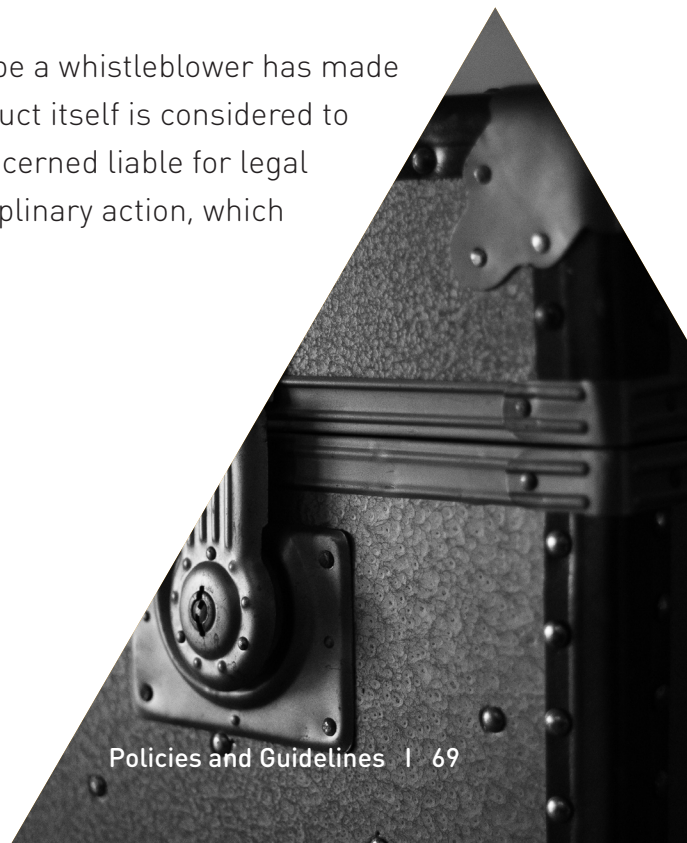
All files created with respect to a whistleblower disclosure and investigation will be kept securely.

The whistleblower will be advised if matters change in a way that affects Just Gold's ability to protect the person's identity. Just Gold will give the person as much warning as reasonably possible if it appears likely that the whistleblower's identity will become known.

- However, even if the identity of a Whistleblower is known or becomes known, Just Gold will continue to ensure that all reasonable steps are taken to protect the Whistleblower from reprisal.
- At the time of making a disclosure, the Whistleblower can request a meeting in a discreet location away from their workplace or from Just Gold.
- Others who know of or suspect that another person has made a disclosure under this protocol should protect and maintain the confidentiality of that person. Staff members who breach confidentiality in relation to a known or suspected disclosure will be subjected to disciplinary proceedings, which may include summary dismissal.

False or Malicious Disclosures

Where it is shown that a person purporting to be a whistleblower has made a false and/or malicious report, then that conduct itself is considered to be a serious matter and render the person concerned liable for legal action, or if they are an employee, then to disciplinary action, which may include summary dismissal.





Working With Us

Overview

We love what we do. We strive to create a flexible, dynamic and supportive workplace culture where our people, and those we work with, are motivated and committed to achieving positive and sustainable outcomes for our organisation and the meaningful work we do.

We live by our guiding values. We act with integrity, honesty and fairness. We expect our team to treat all others with courtesy and respect and behave in accordance with our values, policies and Code of Conduct.

Just Gold expects our people to take personal accountability for their actions and understands their role and obligations in complying with all applicable laws and codes of practices and contributing to a safe, respectful and inclusive workplace.

Our Workspace

We choose to work in a creative shared workspace conducive to collaboration, growth and innovation. The Commons' flexible office environment suit the agile way we work – from home or a café or on the train or on a plane.

Just Gold is also leading the way in the modern virtual workplace by creating a flexible online platform accessible to our employees, contractors and partners.



Whether you work with us at The Commons or offsite at production studios, event venues client workplaces or virtually, you must follow our guiding principles, policies and procedures.

COVID-19 Safety Measures

Just Gold is following all precautions and Government health directives to ensure we minimise risk of COVID-19 infection for those who work with us.

Our shared workspace at The Commons provides a COVID-safe environment that goes above and beyond the recommended sanitation standards and has plenty of space to maintain physical distancing requirements.

We all need to take responsibility to ensure that our acts or omissions do not result in another person at our workplace contracting COVID-19. These include:

- Do not come into the office or external workplace if you are experiencing any symptoms consistent with COVID-19 or feel unwell.
- Follow all directions and instructions given in relation to minimising or eliminating the risk of COVID-19 at work.
- Follow physical distancing and hygiene protocols and any other applicable orders/directions given under public health and emergency management legislation.
- Report any suspected or confirmed case of COVID-19 to Just Gold Directors.
- Use PPE as instructed, if applicable.
- Take reasonable care for your health and safety outside the workplace (in respect of COVID-19 transmission) for the duration of an assignment or shoot.

Special safety measures are in place for all film productions during COVID-19 to safeguard our team and collaborators (see *Production Guidelines*).



Flexible Work

We get it. We recognise that flexible work arrangements produce significant benefits for everyone. They help providing a better work/life balance and promote diversity and inclusion in the workplace.

We encourage work practices and processes that enable flexibility, while ensuring our operational needs are met and our projects are delivered on time and to the high standards we expect.

- We will actively work with you to find solutions to requests for flexible working arrangements where possible.
- We support family-friendly practices and flexible hours arrangements for parents and carers.
- As long as the job gets done, we don't care where and when you work.
- If you have any special requests or needs, raise them with a Just Gold

Attendance

Being able to depend on your team is paramount at Just Gold. It is essential to the efficient workflow and productivity and to the success of our business.

We understand there are times you will be unable to work, if you are sick or have a child to look after or a family emergency to deal with. We expect you to make every effort to consider the impact of any absences, especially when they affect your colleagues and our ability to deliver

- We expect you to be punctual and follow the scheduled working hours you and Just Gold have agreed on.
- If you face an emergency that prevents you from coming to work, you must contact a JG Director or colleague as soon as possible.



- You cannot be uncontactable for any lengthy period of time.
- Repeated late attendance or absence from work without a valid reason or proper notification may lead to termination of employment or engagement with Just Gold.

Occupational Health & Safety

Our objective is to provide a safe and healthy working environment and minimise any risks to the health and safety of our clients, partners, audiences and members of the public.

Just Gold is committed to complying with all occupational health and safety laws relevant to the conduct of our business activities.

All our team has a duty to take reasonable care for their own health and safety and in the workplace, ensuring they don't put others at risk.

Drugs & Alcohol

Just Gold has a zero-tolerance policy for use of alcohol and other drugs in the workplace.

We expect our people to present to work in a fit state to do their job. Turning up hungover from the night before or coming down from drugs can make it dangerous to be at work – as well as make you unproductive, tired, irritable and moody and not fun to work with.



Alcohol and drug use (including prescription and illegal drugs) becomes an occupational health and safety issue when your ability to exercise judgment, coordination, motor control, concentration and alertness at work is impaired.

- Do not consume or use alcohol, drugs or any other substances in the workplace that could affect your ability to work in a safe and efficient manner and put you or others at risk.
- Tell a Just Gold Director if you are taking prescription or over-the-counter medications that may impair your performance, to ensure we manage any associated risks (your personal information will be treated in the strictest confidence).
- Tell a Just Gold Director if you are taking prescription or over-the-counter medications that may impair your performance, to ensure we manage any associated risks (your personal information will be treated in the strictest confidence).
- If you are concerned that a co-worker's alcohol or drug use is affecting their work or the safety of others, you have obligation to notify a Just Gold Director.
- Anyone driving vehicles must have a zero-blood alcohol concentration.
- If you are working at events where alcohol is being served, you may not drink during your shift.

If you need support dealing with alcohol or drug-related issues, speak to a Just Gold Director or seek advice from the Australian Drug and Alcohol Foundation¹, which can provide information and referrals to support services.



Working with children

Just Gold projects that involve participation or employment of children are required to comply with all relevant legislation and obtain all applicable consents, permits and permissions. This includes:

- Obtaining parental consent if the project or artwork involves working with a child under the age of 15
- Obtaining applicable permits for children who will be employed
- Obtaining working with children checks for all adults who will be involved in child related work, prior to that work starting.

All employees and contractors engaged in child-related work are required to provide proof of or apply for a Working with Children (or other relevant state-based) check.

Social Media & Public Comment

We are all very passionate about what we do at Just Gold. We love showcasing our work and encourage you to spread the word about your work with us on your social media channels – when the time is right.

We work with a range of clients that rely on our discretion and confidentiality. To avoid any problems or misunderstandings, follow these guidelines when posting anything about your work with Just Gold on your personal or business social media channels or any other form of online or public discussion:

- Do not comment on or publish photos of work you are doing with Just Gold during the course of a contract or once it is completed, unless you have prior approval or are sharing a public post from our channels.



- Please act responsibly with the information you are entrusted with. If you have signed a confidentiality agreement you are expected to respect client confidentiality and follow it.
- Only Just Gold Directors are official spokespersons for Just Gold, so you must make clear in any public forum that you are speaking for yourself and not on behalf of Just Gold.

Please also see our *Social Media Policy*

Complaints

Our staff and contractors have the right to work in a safe working environment and to be treated with dignity and respect.

If you have a problem, concern or grievance about your work, co-workers or workplace please contact a JG Director. All complaints will be considered with sensitivity and respect and will be responded to quickly and appropriately.

Please see our *Complaints and Compliments Policy*.

Conflict of Interest

Just Gold operates with transparency and our policies and procedures aim to ensure that any actual, potential and perceived conflicts of interest are identified and managed effectively. We expect our team to take reasonable steps to avoid real or apparent conflicts of interest to minimise any adverse impact on our business.

Please see our *Conflict of Interest Policy*.



Our Content

Editorial Standards

Just Gold upholds the highest standard of editorial integrity in our publications and social media pages, podcasts and digital platforms. We are committed to the fundamental journalistic principles of honesty, fairness, independence and respect for the rights of others. Our editorial policies are guided by the relevant industry code of ethics and advisory guidelines.

We expect our team to follow these principles and guidelines when producing Just Gold content.

For further information, please see the *Just Gold Editorial Guidelines*.

Brand guidelines

Just Gold's Brand Guidelines provide resources, guidance and information on using Just Gold's brand mark and guide every piece of visual content the brand creates. Our brand guidelines are the essential reference point, ensuring we always represent a cohesive and compelling message.

For further information, please see the *Just Gold Brand Guidelines*

@wearejustgold

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