

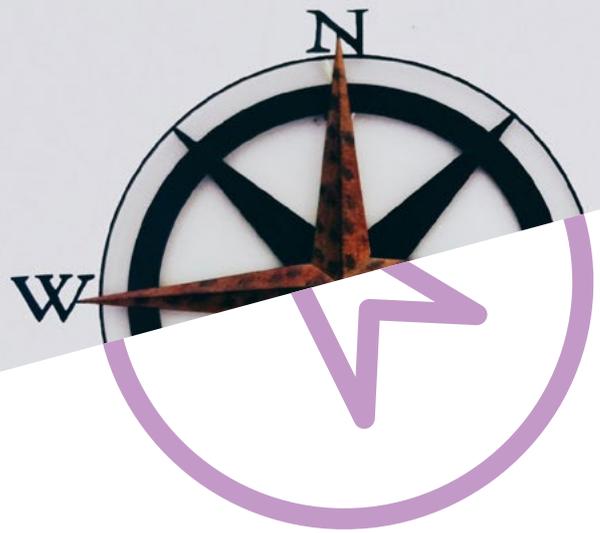
Policies & Guidelines



just.Gold

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Moral compass & values

Our moral compass guides everything we do.

Our Vision

Everyone should have access to opportunity to fully participate in society.

Our Mission

We connect and enable highly skilled professionals from disadvantaged groups to deliver accessible high-end services around the world. We do so by creating shared value ecosystems linking commercial and social purpose projects and clusters.

Our 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.



Editorial guidelines

Just Gold Digital Agency Pty Ltd- including our publications and social media pages (“Just Gold”, “we”, “us”, “our”) is committed to the journalist principles of:

- Honesty
- Fairness
- Independence
- Respect for the Rights of Others.

These principles are outlined in the Media Entertainment and Arts Alliance Journalist Code of Ethics, and particularly in the Australian Press Council journalist guidelines.

The Australian Press Council (“Press Council”, “Council”) guidelines that we have adopted include the following:

1. The General Principles

Accuracy and clarity

1.1. Ensure that factual material in news reports and elsewhere is accurate and not misleading, and is distinguishable from other material such as opinion.

1.2. Provide a correction or other adequate remedial action if published material is significantly inaccurate or misleading.



Fairness and balance

1.3. Ensure that factual material is presented with reasonable fairness and balance, and that writers' expressions of opinion are not based on significantly inaccurate factual material or omission of key facts.

1.4. 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 of General Principle.

Privacy and avoidance of harm

1.5. Avoid intruding on a person's reasonable expectations of privacy, unless doing so is sufficiently in the public interest.

1.6. 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

1.7. Avoid publishing material which has been gathered by deceptive or unfair means, unless doing so is sufficiently in the public interest.

1.8. Ensure that conflicts of interests are avoided or adequately disclosed, and that they do not influence published material.

2. Advisory Guidelines

When reporting we take into consideration the Press Council's Advisory Guidelines that can be found here: www.presscouncil.org.au/advisory-guidelines



3. Advertorials

'Advertorial' is the term for newspaper and magazine content that looks like editorial content but is published under a commercial arrangement between an advertiser, promoter or sponsor of goods and/or services and the publisher.

Such commercial arrangements may include payment for articles to be published and undertakings that editorial content will be published in exchange for, or as part of, an agreement to place an advertisement or provide a sponsorship.

'Advertorials' should be identified by such terms as "advertisement", "advertising feature", "special feature", "sponsored feature" and the like so that readers are not led to believe that their content is based on editorial news values free of commercial influences.



Privacy Policy

Just Gold is committed to the protection and respect of privacy, and takes its obligations under the Privacy Act 1988 (Cth) very seriously. As a result, we have implemented practices, procedures and systems to comply with our legal obligations and, in particular, to:

- maintain the confidentiality and security of personal information it collects and holds; and
- manage its systems, practices and procedures in an open and transparent way.

By “personal information”, we mean information or an opinion about an identified individual or about an individual who is reasonably identifiable from the information.

This Policy sets out how we handle personal information we collect and hold. This Privacy 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.

What is Personal Information?

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

Examples of Personal Information we may collect 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 when you contact us, subscribe to Just Gold, sign up for email news, enter a competition or respond to a survey.

Where reasonable and practicable to do so we will collect your Personal Information directly from you.

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.

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.

When we collect Personal Information 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 requested by us.

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: for example where you have elected to receive electronic direct mail from third parties; and
- 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.



You can contact us by email or phone using the contact details below. We undertake to respond within 30 days. If the request or complaint will take longer to resolve, we will provide you with a date by which we expect to respond.

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, weblogs and other communication information).

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.

The information thus 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.

Cookies and other similar technologies help us serve relevant ads to you more effectively. They also help us collect aggregated audit data, research, and performance reporting for advertisers. Pixels enable us to understand and improve the delivery of ads to you, and to know when certain ads have been



shown to you. Since your web browser may request advertisements and web beacons directly from ad network servers, these networks can view, edit or set their own cookies, just as if you had requested a web page from their site.

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, interest-based advertising. We may track your response to our advertisements, emails and content, determine your ability to receive HTML-based email messages, learn how many users open an email, and allow our service providers to compile aggregated statistics about an email campaign that we are running. This information may be shared, only when anonymised, with third parties to assist them in understanding the performance of advertising in our services.

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 such other sites. When you follow a link to another website, we advise you to read their privacy policy.

Privacy Enquiries and Complaints

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

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



Complaints

Just Gold Digital - including all our publications and social media pages (“Just Gold”, “we”, “us”, “our”) takes complaints about our editorial performance very seriously.

Editorial complaints generally need to be about our content or social media posts.

You will need to tell us where and when you saw or read the content you are complaining about and why you feel it did not comply with our editorial standards.

How to lodge a complaint

Email: Send your email to complaints@justgold.net

Mail: Send your letter to Just Gold Digital Agency, The Commons QV, 3 Albert Coates Ln, Melbourne 3000 VIC

The best way to lodge your complaint is via email.

- Please provide a valid email address, so that you can receive a reply
- Please tell us which content you are complaining about – for example, the social media platform the content was on, the type of content (interview, review, article, social media post, report/share, comment by any of our social media pages or employees, live event etc.), the title and the date and time it was posted or published.
- Please outline the nature of your concerns – if you are alleging a breach of our Editorial Policies, tell us which standards you believe have been breached and your reasons for coming to this view.

- Please also note that we expect our readers to correspond with us in good faith and the same courteous terms they would expect to receive in reply. Offensive or abusive correspondence will not receive a response from any of our pages or publications.

What will happen to your complaint

If your complaint is about a matter of personal taste or preference, we will note your concerns. We might also ask the editor responsible for the content to provide you with a response.

If your written complaint relates to our editorial standards (as set out in our Editorial Policies) and identifies a specific item of our content as possibly breaching these standards, we will review carefully.

Please note that we do not accept a complaint if it is received more than 3 months after the content was published on our platforms. We usually respond within 30 days of receiving your complaint. We review the content that you have complained about and assess its compliance with our editorial standards.

We take into account other relevant material, and we write to you and advise of our findings. Where applicable, we also advise of any remedial action that will be or has already been taken. If your complaint is covered by our Editorial Policies, we will also advise you of your option to refer the matter to the Australian Communications and Media Authority.

If you were expecting a response and have not received one, please contact impact@justgold.net or call us on (03) 9028 5800 during business hours (AEST).



If you are not satisfied with our handling of a complaint covered by our Editorial Guidelines, you can refer your complaint to the Australian Communications and Media Authority (ACMA).

About ACMA

ACMA is an independent federal statutory authority responsible for the regulation of free-to-air radio and television, pay TV, digital broadcasting and internet content in Australia.

You can telephone ACMA (toll-free) on 1800 226 667 or write to ACMA at PO Box Q500, Queen Victoria Building, NSW 1230. The ACMA website is available at www.acma.gov.au.

Correction of errors

When errors occur, we accept responsibility and act promptly and appropriately per our Editorial Policies and Moral Compass. Corrections will be made in a timely manner and in a form most suited to the circumstances.

You can request a correction by sending an email complaints@justgold.net

Legal matters

In regard to legal matters, please contact Just Gold Digital Agency PTY LTD, The Commons QV, 3 Albert Coates Ln, Melbourne 3000 VIC



Conflict of interest policy

1. Purpose

The objective of this policy is to ensure that actual, potential and perceived conflicts of interests (“conflicts”) are identified and managed effectively. Just Gold Digital Agency Pty Ltd (“Just Gold”, “we”, “us”, “ours”) is committed to identifying, declaring and managing conflicts.

Just Gold may amend this policy from time to time without notice in its absolute discretion.

Any person to whom this Policy applies who breaches this Policy or who coerces, encourages or assists another person to breach this policy may be subject to disciplinary action.

2. Scope - Who does the Policy apply to?

The policy applies to you if you are employed by Just Gold (whether full-time, part-time, casual or temporary) or if you are a contractor to us. It applies no matter what level of seniority and no matter what length of service.

3. What is a conflict of interest?

3.1. Definition

Conflicts arise when two or more competing interests are involved in the same situation. Examples include, but are not limited to, conflicts between employees and a customer, conflicts between employees and Just Gold, conflicts between a customer and Just Gold or conflicts between different customers or groups of customers.



ASIC Regulatory Guide 181 (Licensing: Managing Conflicts of Interest) defines a Conflict as follows: "Conflicts of Interest are circumstances where some or all of the interests of people (clients) [i.e. customers] to whom a licensee (or its representatives) provides financial services are inconsistent with, or diverge from, some or all of the interests of the licensee or its representatives.

3.2. Types of Conflicts

A Conflict may be actual, potential or perceived:

ACTUAL CONFLICT — an activity that causes a Conflict;

POTENTIAL CONFLICT — an activity that could give rise to an actual or perceived Conflict, either at the time of the activity or at some time in the future; or

PERCEIVED CONFLICT — an activity or transaction of which a third party could reasonably form the view that a Conflict currently exists or may exist at some time in the future.

Examples of when conflicts arise:

- (a) A manager decides to hire an applicant who is a family member or friend of the manager;
- (b) An employee enters into a purchasing, supply or other contract on behalf of Just Gold with another entity in which the employee holds a financial interest;
- (c) A person is required to represent or serve the interests of two or more clients whose interests are in conflict;



(d) A person is in possession of confidential information about one customer and is required to take on another project or role where there is an actual risk of that confidential information being disclosed without the customer's permission; and

(e) A conflict may exist even if you endeavour not to be, or believes that you will not be, influenced by the conflicting interest or duty.

The above list contains examples only and accordingly is not intended to limit the range of circumstances in which a conflict arises. 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:

(f) An actual conflict of interest is an actual conflict between your duties or between your duty and your private interest(s);

(g) A potential conflict occurs when there is a possibility that a conflict of interest might arise in the future; and

(h) A perceived conflict occurs when there is a reasonable perception that there could be a conflict of interest.

4. Procedure for identifying, declaring and reporting conflicts

4.1. Identify conflicts

You are required to actively consider whether any actual, potential or perceived conflict of interest arises in the course of your employment or contract. If you are unsure about whether there could be a conflict, you should speak to the Directors.



4.2. Declaring and reporting conflicts

You are required to declare all conflicts that affect you to the Directors.

- (a) making hiring or promotion decisions;
- (b) conflict between consulting activities and procurement of goods, works or services; and
- (c) conflict among consulting assignments

4.3. Declaring and reporting conflicts

You are required to declare all conflicts that affect you to the Directors. You must notify the Directors as soon as practicable 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.

4.4. Register of conflicts

The Directors are responsible for recording all declared conflicts into a register of conflicts. The Directors are also responsible for recording reported conflicts considered by the Directors as constituting conflicts. The register of conflicts should include 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.

4.5. Confidentiality of disclosures

Access to the information of the full register is restricted to the Directors of the company.

4.6. Procedure for managing conflicts

The Directors are responsible for managing conflicts. The appropriate action to be taken in effectively managing conflicts will depend on the particular circumstances of each case. The focus should be on resolving conflicts, where possible.

The Directors are required to exercise their discretion to determine and implement the most appropriate action for effectively managing the conflict of interest in each case.

The Directors must also state the reasons for the management action taken including any subsequent changes to action taken.

The following non-exhaustive factors should be considered in determining the appropriate management action to be taken:

- (a) Options to resolve the conflict of interest;
- (b) The significance and consequence of the conflict of interest including likely impact on [the company's] business and reputation;
- (c) The impact of the proposed management action on the conflicted employee and other key stakeholders;



(d) The extent of the conflicted employee's involvement in the relevant decision making process;

(e) Whether another person is capable of carrying out the duties of the employee.

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

(f) 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.

(g) 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.

(h) 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, the decision-making responsibility may be temporarily transferred to another person until the conflict of interest no longer exists.

(i) Other action - 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:

(i) Appointing an independent person to supervise the decision-making process;

(ii) Requiring you as the conflicted person to leave the room while discussions take place;



(iii) Restricting your access to information; and

(iv) Withdrawing you from participating in key or critical decisions.

The Directors should continue to monitor the conflict of interest and, if appropriate (because, for example, the relevant circumstances change), change the management action initially taken.

Policy Updates

This Document may change from time to time.

This Document was last updated on 1 June 2020.



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