



# Code of Conduct

## 1. Introduction

Wynnum Manly Seagulls Rugby League Football Club Limited (**'Seagulls Football'**) is committed to ensuring an ethical culture exists across Seagulls Football.

The Code of Conduct (**'the Code'**) is underpinned by our core values of Greatness, United, Leadership, Loyalty, and Selfless. Adherence to the principles set out in the Code will contribute to the development of a positive culture that will maintain and enhance the integrity and reputation of Seagulls Football.

## 2. Purpose

The Code is a key element of the Seagulls Football administration framework and its purpose is to provide details of the minimum standards of conduct expected of management, staff, volunteers and players (**'Seagulls Football Representatives'**) in the performance of their duties, including their dealings with Seagulls Football Players, Officials, clients, and other stakeholders as well as each other.

Compliance with the Code is a condition of your appointment as a Seagulls Football Representative.

An effective Code will result in:

- a. A culture of integrity and compliance with relevant laws and industry standards;
- b. More effective management;
- c. Minimisation or elimination of liabilities;
- d. Protection and enhancement of the best interests, image and welfare of Seagulls Football, the Seagulls Football Club, Affiliated Clubs and the Game.

## 3. Scope

The Code sets out the minimum standards of conduct required from Seagulls Football Representatives in respect of legal, regulatory and industry compliance, as well as standards of acceptable behaviour and interaction with our stakeholders.

A stakeholder includes any person, company, government or non-government organisation that would have an interest in the Wynnum Manly Seagulls Rugby League Football Club



Limited normally through their dealings in the normal course of conducting its business with Seagulls Football. This would include but not be limited to the ARL Commission, Directors and employees, NRL, QRL, Wynnum Manly Leagues Club, Players, Club Officials, Clients, Government State and Federal, Auditors and Suppliers.

Social media refers to any online tools or functions that allow people to communicate and/or share content via the internet. This would include but not be limited to Facebook, Twitter, LinkedIn, Google+, Pinterest, Yammer, YouTube, Snapchat, Wikipedia, SMS, Skype, WhatsApp, Viber, Vimeo, Vine, Flickr, Online voting or polls, Public and private online forums and discussion boards, and any other online technologies that allow individual users to upload and share content.

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### **4. Responsible dealing with our Stakeholders**

Seagulls Football Representatives personal conduct and actions have a significant impact on our reputation and you are required to act in an honest, professional and responsible manner in line with Seagulls Football's policies, procedures and regulations that relate to your role. In your dealings with stakeholders you are required to act in both an ethical and fair manner in accordance with the following principles:

- You will at all times exercise due care and diligence in performing your duties and responsibilities.
- You will ensure that you communicate with all relevant and industry stakeholders appropriately and in a full, frank and timely manner.
- You will protect and efficiently use the property and assets of the Seagulls Football only for the legitimate business purposes of the Seagulls Football.
- You will adhere to our accounting policies and practices.
- You will not interfere with the Seagulls Football's external auditors in the performance of their duties, nor any other duly authorised person undertaking a review of the Seagulls Football's compliance systems. Such interference will be a breach of this Code and may also be a breach of the Companies Code.



## 5. Compliance with laws, Seagulls Football policies and procedures

You must comply, and promote compliance, with the laws and regulations that govern the operations of the Seagulls Football, and the Administration Framework of the Seagulls Football including this Code.

All Seagulls Football policies and procedures including those for the proper management of legislation can be made available upon request. If you are unsure of your responsibilities you should consult the Chief Executive Officer.

## 6. Avoid Conflicts of Interest

You must avoid, or properly manage, any circumstance that could result in a conflict of interest with, or be prejudicial to, the business of Seagulls Football and its stakeholders. More specifically;

- You shall not act in an official capacity in respect of any Seagulls Football game or competition in which you have a pecuniary interest;
- You cannot pursue an interest or other employment or business venture which directly or indirectly competes with the Seagulls Football without the written consent of the Chief Executive or, in his/her case, the approval of the Seagulls Football Board of Directors;
- You should ensure that your personal relationships and dealings with stakeholders do not put the integrity of your business relationship with them at risk;
- You must not accept commissions from service providers to the Seagulls Football or provide commissions or incentives to clients of the Seagulls Football;
- You must ensure that all gifts are free from obligation or expectations of favours and report any offers or receipt of gifts, valued in excess of \$200, to the Chief Executive Officer;
- A “gift” includes any invitations to sporting or entertainment events, travel, lodging, goods and services. All such invitations, regardless of value, must be reported to the Chief Executive Officer;
- You are not permitted to use the Seagulls Football’s property or information, or your position, for personal gain without the prior written approval of the Chief Executive Officer.



In the event that a conflict of interest arises, you are to immediately inform the Chief Executive Officer who will take action to protect the Seagulls Football and, depending on the circumstances, may require you to no longer participate in the transaction, decision or activity while the conflict exists. Disclosure may also be made to both internal and third parties affected by the situation.

## 7. Confidentiality and Privacy

You agree not to, whether during the term of your employment or after its termination, use or disclose to any person any confidential information or trade secret of the Seagulls Football, except insofar as it is reasonably necessary to enable you to fulfil your obligations as an employee. Confidential information may include Seagulls Football Players, Club Officials, clients, employees or other stakeholder records or information on business dealings.

Breaching the Seagulls Football's privacy policy may be in violation of State and Federal legislation and may have a serious impact on the credibility and standing of the Seagulls Football reputation and also on you as an individual.

## 8. Media Contact and Public Statements

The Chairman and Chief Executive, or in their absence, their designated deputies are the only Seagulls Football officers authorised to make public announcements on the behalf of the Seagulls Football. You are not permitted, unless authorised by the Chief Executive, to make public statements about any aspect of the Seagulls Football, its operations or employees.

Should anyone attempt to pressure you to make public statements under no circumstances are you to make any statement and, advise them to contact the Chief Executive. In this circumstance you should immediately advise the Chief Executive Officer of the incident.

## 9. Social Media

The Chief Executive, Commercial Officer and Administration Officer, or in their absence, their designated deputies are the only Seagulls Football officers authorised to make social media announcements on the behalf of the Seagulls Football.

You are not permitted to make announcements on behalf of the Seagulls Football on social media.

Seagulls Football acknowledges the enormous value of social media to promote the Seagulls Football and celebrate the achievements and success of the people involved in the Seagulls Football.



You are expected to conduct yourself appropriately when using social media to share information related to the Seagulls Football.

Social media posts, announcements etc:

- Must not use offensive, provocative or hateful language
- Must not be misleading, false or injure the reputation of another person
- Must not contain material which is in breach of laws, court orders, undertakings or contracts
- Must not disclose confidential information of the Seagulls Football
- Should respect and maintain the privacy of others
- Should promote the Seagulls Football in a positive way.

## 10. Whistle Blower Procedure and Protection

If, in good faith, you have reasonable grounds to suspect unlawful or unethical behaviour you are required to report in writing or, if in doubt, to initially discuss the issue with either the Chief Executive Officer or the Seagulls Football's auditor. Under no circumstances should you confront the individual(s). By following this process, confidentiality will be maintained and the matter investigated promptly and impartially.

If you have reported such behaviour you will not be disadvantaged in any way and you will be protected by Seagulls Football. Officers of Seagulls Football to whom suspected breaches of the Code are reported, are required to keep the matter confidential, report the matter to the appropriate authority and to protect the person concerned from any harassment or discrimination.

## 11. Monitoring Compliance

Seagulls Football as part of its compliance review will, monitor the application of the Code and you will be assessed on your compliance to the Code in performing your daily duties. The level of compliance will be reviewed and summarized annually in your performance review.

## 12. Interpretation of and your input to the Code

Should you require any assistance in the understanding or interpretation of the Code please direct your enquiry to the Chief Executive Officer. Your input to the Code is welcomed.



## 13. Your Responsibilities and Consequences

It is your responsibility to carry out your duties in a manner that is consistent with the words and intent of this Code. The contravention of this Code is a serious matter; it may result in disciplinary action including termination and or civil and/or criminal proceedings.

## 14. Maintenance and Review

This Code will be reviewed annually by the Seagulls Football Board of Directors to ensure it remains consistent with the objectives of the Seagulls Football and is both effective and efficient.

## 15. Communication of the Code

The current approved document is held on the Seagulls Football common drive and can be made available upon request to all employees. All new employees will be advised of, and have the Code explained to them, during their induction process. Any changes to this Code will be communicated to all employees by the Chief Executive Officer.

## 16. Document Management

| Unique Identification Number | Version | Release Date | Description           | Author      |
|------------------------------|---------|--------------|-----------------------|-------------|
| -                            | 1       | 27/04/2018   | WMS – Code of Conduct | Hanan Laban |

## 17. Authorisation

Complied by: Hanan Laban (Chief Executive Officer)

Reviewed by: WMS Board of Directors

Approved by: WMS Board of Directors