

# Our code



Proud to be **coles**

# What it means to be part of the team

At Coles, we have a way of working that helps ensure a productive, positive environment for our team, customers, suppliers, communities and everyone else we interact with.

We live by 'the Coles way', act lawfully and apply this code of conduct to everything we do.

The following pages detail the conduct and behaviour we expect from our team across all our businesses, spanning supermarkets, liquor, hotels and convenience.

With your support, we can ensure that Coles is a great place to work and shop – a Coles we can all be proud of!

**coles**

**coles**  
*liquor*

**coles**  
*express*

**BI-LO**  
WHY PAY MORE!

**CHOICE**  
LIQUOR  
SUPERSTORE

**Pick n Pay**  
**hypermarket**

**LIQUORLAND**

**VINTAGE CELLARS**

**spirit**  
HOTELS



A handwritten signature in black ink, appearing to be 'Ian McLeod'.

Ian McLeod  
Coles Managing Director

# The Coles way

As Coles team members, we understand what we stand for and what we want to achieve.

No matter where we work, we share a common purpose and approach, both in 'what we do' and 'how we do it'. We call this 'the Coles way'.

'The Coles way' is made up of four elements; our goal, our values, our circle for success and our ways of working.

## What we stand for, what we want to achieve.

### Our goal

What we want to achieve

**"To give the people of Australia a shop they trust,  
delivering quality, service and value."**

### Our values

What we believe in

- ① **Our customers come first – always!**
- 🕒 **We support each other to get things done.**
- 😊 **We take pride in the service we provide.**
- 🔄 **We constantly strive to do better.**

### Our circle for success

Our six point plan to deliver our goal



### Our ways of working

How we work together

- Lead effectively**
- Act collectively**
- Support consistently**
- Motivate universally**
- Care passionately**



# Our conduct

## Workplace behaviour, diversity and equal opportunity

Coles is committed to diversity and equal opportunity. We will recognise and appreciate the value of our differences, internally amongst team members and also externally amongst customers, suppliers, contractors and anyone we interact with in our work with Coles.

We will not accept harassment, sexual harassment, discrimination, bullying or any other inappropriate workplace behaviour.

### **I will:**

- Treat everyone that I interact with in the course of my employment with dignity, courtesy and respect.
- Contribute positively to an environment where team members and others I interact with can work and customers can shop without the distress or interference caused by harassment, sexual harassment, discrimination or bullying.
- Not unlawfully discriminate against people in the provision of our goods and services, and in all aspects of employment including recruitment, training, promotion, remuneration and benefits and termination of employment on prohibited grounds (such as age, gender, race, disability, religion, etc.).
- Not make any disparaging or untruthful remarks about Coles, other team members, customers, competitors, contractors or suppliers.
- Be aware of my association with Coles in online social networks and ensure my profile and related content is in line with this code of conduct.



## Safety, health and wellbeing

Coles will provide a working and shopping environment where team members and customers are safe. We do not accept behaviour that risks the safety of team members, customers, suppliers, contractors or anyone we interact with in our work. This includes physical and psychological violence or harm, or threats of violence or harm.

### **I will:**

- Behave in a way that ensures my safety and the safety of others. I will not put the safety of others or myself at risk.
- Follow all safety requirements.
- Attend fit for work and not under the influence of alcohol or other drugs/substances, and comply with the drug and alcohol policy in my area of the business.
- Maintain personal grooming/presentation standards.
- Not possess or traffic unauthorised alcohol, weapons or illegal drugs at work.
- Not smoke on company premises except in designated areas.
- Abide by the laws and regulations and company policies related to service of alcohol and sale of tobacco.

## Fair trading

We will provide customers with the confidence that we will always be open, honest, ethical and trustworthy in all our dealings with them.

### **I will:**

- Deal openly and honestly with customers.
- Follow safety and product information standards and action product withdrawals and recalls.
- Honour customers' rights to a refund or exchange.
- Work with suppliers of goods and services in a constructive and fair manner.
- Deal fairly and honestly with suppliers and not use undue pressure, coercion or unfair tactics.
- Interact with competitors in a fair and reasonable manner.
- Deal fairly with competitors and not influence or restrict their dealings.
- Not enter into any discussions or agreements with competitors regarding prices, discounts or sales.
- Not misuse our position to restrict competition in the marketplace.

## Conflict of interest

Situations can sometimes arise where a team member has interests which conflict with those of Coles. For example, a conflict of interest exists where a team member makes a Coles business decision, or influences a decision, that provides a personal benefit to themselves or a related third party such as a partner, relative, business or associate.

For example, it would be considered a conflict of interest for a buyer to have independent contract or trading discussions involving a supplier with family connections. Similarly, it would also be considered a conflict of interest for a Store Manager to give preferential treatment (e.g. roster hours) to a family member in their employment.

Coles recognises there is potential for a conflict of interest in a range of situations involving team members, customers, suppliers and other parties, and will work with team members to resolve potential or actual conflicts of interest.

### **I will:**

- Declare any actual, perceived or potential conflict of interest to my line manager.
- Ensure other employment does not impair my ability to perform my role for Coles.
- Not accept gifts from customers, agents, contractors or suppliers.
- Only accept entertainment where it is an essential part of doing business, an existing business relationship exists, and my line manager has approved it.
- Only purchase merchandise direct from suppliers when it is an approved business requirement.
- Not offer or accept a bribe or engage in fraud.

## Confidentiality of information

Information is considered confidential when it is not readily available to the public. The majority of information used throughout Coles is confidential. If you are in doubt, treat information as confidential. Coles will not accept the unauthorised disclosure of confidential information.

### **I will:**

- Keep Coles' information confidential except where disclosure is authorised or required by law.
- Use only my own systems log-on ID and password, and not provide them to another user.
- Use confidential information solely for authorised purposes. I will not use it inappropriately to gain an advantage for myself or someone else, or to cause detriment to Coles.
- Refer requests for information from the media to Corporate Affairs.
- Refer requests for information from investors to Wesfarmers Investor Relations.



## Privacy

Coles is committed to ensuring the privacy of individuals and safeguarding the personal information provided by team members, potential team members, customers, suppliers, contractors and anyone else we interact with in our work with Coles. We will not accept collection, use or disclosure of information for anything other than the purpose for which it is required.

### **I will:**

- Respect and maintain the privacy of individuals.
- Respect information I have or know about team members, customers, suppliers, contractors and anyone else I interact with in my work with Coles.
- Collect, retain, store and disclose information appropriately.

## Company resources

Coles will not accept deliberate or reckless damage to, or the theft or misuse of its resources, or the resources of others who we interact with in our work with Coles.

Resources include: stock, money, equipment, stationery, files, data, records, computer hardware and software, intellectual property and company work time.

### **I will:**

- Use company resources for the purpose intended.
- Abide by copyright and trademark laws, including company logos.
- Maintain accurate business records, including work attendance, merchandise and accounting records, and not falsify them.
- Enter into agreements with external parties to the extent that I have the authority and approval to do so.
- Use my team member discount privileges in accordance with their terms of use.
- Place stock on hold appropriately: not in order to purchase it at a lower price on a later date.
- Process markdowns correctly and not take or give unauthorised markdowns.
- Pay for company stock or assets before consuming them or leaving the workplace with them.
- Process transactions, including discount vouchers and loyalty programs such as FlyBuys, correctly and not process my own transactions, or transactions for friends or family.
- Not return stock and receive a greater refund than the amount originally paid for the stock.
- Not remove testers, bonus stock or samples from the workplace without authorisation.
- Report any knowledge of misuse or theft of company resources.



# Our responsibilities

## Everyone

At work and work-related social situations, or any situation where you are representing Coles:

- Embrace and act in accordance with this code.
- Make truthful statements, promises or commitments that you and Coles are able to meet.
- Fulfil your contract of employment.
- Learn about and comply with Coles policies and procedures, and all relevant laws.
- Role model and share your knowledge about this code with other team members.
- Raise situations you think could be in breach of the code with your line manager and encourage others to do the same.
- Keep the code of conduct accessible for ongoing reference.
- Protect the reputation of all Coles businesses.

## Leaders

In addition to everyone's responsibilities, managers are expected to:

- Lead by example and comply with this code, company policies and all laws that apply in your area of responsibility.
- Build team members' knowledge of and compliance with this code, company policies and all relevant laws.
- Provide an environment where team members can raise their concerns and discuss them openly without fearing or experiencing negative consequences.
- Manage behaviour that is inconsistent with this code.
- Lead and manage team members in accordance with this code and the Coles way.



# Reporting a breach

If you genuinely believe that conduct in breach of this code has occurred, please raise your concerns with a manager, or if the breach involves your line manager, please raise it with their manager. There may be occasions when a team member has used this process and the conduct has continued.

In these instances, the **Line Manager Advisory Centre** can provide information, advice and assistance for team members with code of conduct concerns or other HR issues. In addition, **StopLine** is an independent and confidential reporting line that team members, suppliers and others can use to report theft, fraud or other serious trading breaches.

Team members can make confidential calls and remain anonymous if they wish.

**Line Manager Advisory Centre** telephone 1300 726 547

**StopLine** telephone 1300 304 550

## **An advisor will:**

- Provide information about the different ways your concern can be resolved, including helping you provide feedback, where relevant.
- Explain the resolution process.
- Keep your details confidential, on a need-to-know basis. This means that they will be shared only with people who need to know them to resolve the concern.
- Arrange for the appropriate area of the business to manage your concern and advise you of the outcome. This could be a manager in your business, the Line Manager Advisory Team, or another Coles support function. The person responsible will advise how long it is likely to take and explain the steps that will be followed.

## **Supporting team members who report a breach**

Coles will not accept conduct that results in a team member fearing or experiencing negative consequences as a result of raising a genuine concern. If you experience negative consequences or believe you are being treated differently as a result of raising a concern, please contact the Line Manager Advisory Centre for assistance.





## Breaches of the code

Coles treats breaches of this code seriously.

If you breach this code, or assist someone else to do so, the breach will be investigated. If it is determined that a breach has occurred, Coles will address the behaviour in line with the circumstances of the individual case. This could include coaching a team member or disciplinary action, which ranges from a warning to termination of employment without notice.

There are some breaches of this code that Coles considers serious misconduct and will not tolerate. Serious breaches are likely to result in termination of employment.

Some examples are:

- Serious harassment, sexual harassment, discrimination or bullying.
- Serious safety breaches, including physical or psychological violence or threats of violence.
- Misleading or defrauding Coles.
- Theft.
- Actions resulting in serious damage of Coles property.
- A serious breach of Coles work and procedures or the law.

### Getting advice

Your line manager is your most direct source of information and action and will be able to assist you to access policies. Specific policies provide detailed explanations of Coles standards across a range of areas and are available on Connect via People Online.

Your line manager will also be able to clarify how this code applies to you in a specific situation, or direct you to someone who can assist.

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telephone 1300 726 547

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