



# Vortex Leisure

## VORTEX LEISURE LIMITED

### CODE OF CORPORATE RESPONSIBILITY



**Vortex Spas**



**Spa Store**



|   |          |
|---|----------|
| <b>Introduction</b>   | <b>2</b> |
| <b>Our 5 'C's</b>   | <b>2</b> |
| Care for our customers and each other with 5 star performance                               | 2        |
| Continually improve our products, systems & presentation through collaboration & innovation | 2        |
| Communicate accurately and honestly   | 2        |
| Celebrate & share our success   | 2        |
| Contribute to our communities   | 3        |
| <b>Compliance with Laws</b>   | <b>3</b> |
| Reporting violations  | 4        |
| <b>Fair Competition</b>   | <b>4</b> |
| <b>Bribery</b>  | <b>4</b> |
| <b>Data Protection</b>  | <b>4</b> |
| <b>General Conduct</b>  | <b>5</b> |
| Dress and Grooming  | 5        |
| Treatment of our internal and external customers  | 5        |
| Customer Service  | 6        |
| Health and Safety   | 6        |
| <b>Discrimination</b>   | <b>6</b> |
| <b>Harassment Policy</b>  | <b>6</b> |
| <b>Conflict of Interest</b>   | <b>7</b> |
| <b>Gifts and Gratuities</b>   | <b>7</b> |
| <b>Working Conditions</b>   | <b>7</b> |

## Introduction

---

As an international company, Vortex Leisure is obliged and committed to responsible and lawful conduct. We recognise that our company is part of society, and that high standards of corporate responsibility contribute to our economic success.

Inappropriate behaviour of even a single person may severely harm the reputation we have established, as well as the trust that is placed in us by our customers, employees, business partners and society as a whole. Therefore, we are all responsible for the reputation of our company.

The Vortex Leisure Code of Corporate Responsibility summarises the significant principles and rules that apply to all our activities. It states the company's expectations and all employees must adhere to these principles in their daily actions.

## Our 5 'C's

---

Our 5 'C's are the foundation stones of our business. They provide us with a framework within which we make decisions on both day to day issues and on the strategic direction of our businesses.

### Care for our customers and each other with 5 star performance

We recognise that our customers pay our wages. As such, we are committed to treating our customers with respect and giving them the highest level of customer service that we can provide.

Whilst caring for our customers is vitally important to us, caring for our teams is equally important. We maintain our employee engagement rating at more than 20% above the national average. We believe that a happy team leads to happy customers and we are yet to be proved wrong!

### Continually improve our products, systems & presentation through collaboration & innovation

The Japanese have the term 'Kaizen'. Loosely translated, this means continuous and never ending improvement.

This philosophy is at the core of our business. We talk about how our business improvement system is like painting the Sydney harbour bridge. You start at one end, get to the other end and then start back at the beginning.

Despite being recognised as a market leader in product development, systems and customer care, we can always do better. We are constantly chasing perfection.

It is an expectation that every employee offers regular suggestions on how we can improve our products, systems and presentation.

### **Communicate accurately and honestly**

For many of our customers, buying one of our products will be one of the biggest purchases they will ever make. We treat this fact with a great deal of respect. As such, we believe we have an obligation to communicate to our customers in as clear and concise way as possible.

### **Celebrate & share our success**

Our family of employees and contractors underpin our success. As such, we wish to reward their efforts beyond 'an honest day of pay, for an honest day of work'.

We are committed to ensuring that the wages and salaries of our employees are within the upper band of national average rates for each respective position. Furthermore, as a group we distribute between 5 and 7.5% of our profits to our team each year through a rather unique profit share system.

### **Contribute to our communities**

As a successful business, we feel we have a moral obligation to give back to our community. Who we contribute to is a decision made by our employees. They nominate and donate a sum each year from their profit share programme and we match that amount.

It is our intention to continue growing the amount we actively contribute back to the community each year.

## **Compliance with Laws**

---

Globally, Vortex Leisure will comply with the respective laws of all countries in which we conduct business. Our company has always been committed to this rule, irrespective of any potential commercial disadvantages this may cause. We expect the same commitment from our business partners. We would rather abandon any objective we could achieve than violate our legal obligations. If there are differences between national laws and the Code of Conduct and relevant international policies or guidelines, the more stringent regulations will be followed.

Each employee is personally responsible for complying with the law within his/her area of responsibility. This includes compliance with competition and consumer laws. Vortex Leisure will not indemnify its employees for any pecuniary penalty or legal costs incurred in any court proceedings in which employees are found to have knowingly or recklessly breached the Competition and Consumer Act 2010 (Cth).

## Reporting violations

Each employee is obliged to report any breaches of law or other applicable policies. To do so, employees should always consult their direct leader. However, if this is not considered appropriate in a particular case, the employee must report the violation to the next higher level of management.

An employee who witnesses a criminal act in the course of business must report the offence as set out above. Any statutory obligation of notification must also be observed. Employees reporting an offence in good faith must not be discriminated against. Any investigation of reported violations will be conducted with utmost confidentiality. Details on the informant will only be forwarded if the informant agrees, or if absolutely necessary to clarify the situation.

## Fair Competition

---

We are committed to the principle of fair competition and will act in compliance with any laws for the protection of competition. All employees are obliged to adhere to relevant competition laws, and illegal exchange of information, price fixing and market-sharing agreements with competitors or suppliers must not occur. We explicitly oppose espionage, theft and use of other illegal methods to gain information on competitors or their business activities.

## Bribery

---

Vortex Leisure does not under any circumstances tolerate acts of bribery. Relationships between Vortex Leisure and its subsidiaries and public officials, companies and private parties must be established in a manner in which any suspicion of corruption is avoided. We therefore do not permit the offering or granting of any form of favour that may be interpreted as an attempt to exert influence.

## Data Protection

---

Protecting the personal data of our employees, customers and business partners is of high importance to us and will not be shared with third parties without express permission being granted. Therefore, personal data is only collected, stored or processed if required for predefined, unambiguous purposes, compliant with the law. Data is secured by both technical and organisational measures. Employees must follow any data protection rules that apply to their area of responsibility to the best of their ability.

## General Conduct

---

While on duty as employees, our behaviour should be such that it contributes to a productive and harmonious workplace and reflects favourably on us and our vocation.

This can be achieved by:

- Following our 5C's
- Dealing fairly and honestly with each other, our customers, suppliers, contractors and competitors
- Handling all customer contacts professionally and courteously
- Complying with any legislative, industrial or administrative requirements, and any lawful orders from persons in authority
- Maintaining and developing knowledge of our fields of expertise
- Exercising our best judgment
- Making decisions fairly and without bias using the best factual information available
- Implementing or abiding by the company's policies and procedures
- Acting responsibly when becoming aware of any unethical behaviour or wrong-doing by any other employee
- Not harassing, bullying or discriminating against other employees
- Reporting to work as required and when an absence is unavoidable, promptly notifying the appropriate person of the reason.

## Dress and Grooming

All of our employees are ambassadors for our company. We expect employees to manifest the company's image by maintaining neat and clean standards of grooming and attire at all times.

## Treatment of our internal and external customers

Our employees are expected to deliver exceptional value and service to both our external and internal customers by conducting themselves with integrity and in a manner that ensures:

- External and internal customers are provided with the products and services they want, and when they want them, at the highest possible level of our 5 star customer care
- All decisions and actions are evaluated against our vision and 5C values
- All decisions and actions are evaluated in terms of their impact on customers
- There is a safe and friendly environment at all times for our employees and customers.

## Customer Service

- We have specific standards by which all staff must abide to ensure customers expectations are met. The standards in dealing with our external customers are as follows:
- Convey a positive image by wearing the corporate uniform if supplied, projecting a positive attitude, using a pleasant and courteous tone of voice and smiling during the interaction
- Acknowledge all customers who enter our stores in a timely manner
- Use the correct telephone answering technique
- Comply with the Company's housekeeping standards to provide a clean and safe environment.

## Health and Safety

The health and safety of our employees is of immense importance. We therefore invest in creating safe working conditions and have work health and safety integrated into all areas of our operations. All employees must adhere to our safe working arrangements at all times, and must immediately report and/or fix any deficiencies within their respective area of responsibility. All managerial staff must support their employees in complying with these obligations.

## Discrimination

---

Under the Equal Employment Opportunity and the Affirmative Action Policy, the Company is committed to providing all employees with equal opportunity. Discrimination or harassment based on sex, national origin, race, religion, marital status, sexual preference, pregnancy, political conviction, physical or intellectual impairment or other factors unrelated to legitimate business interests will not be tolerated.

## Harassment Policy

---

Vortex Leisure and its subsidiaries are committed to providing all employees the opportunity to pursue excellence in their professional endeavours. This can only exist when each employee is assured an atmosphere of mutual respect, one in which he or she is judged solely on criteria related to job performance. It is Vortex Leisure policy to maintain a work environment which is free from any form of harassment (sexual, physical or emotional). Our company fully subscribes to the laws which forbid such conduct in the workplace and will not tolerate offensive, humiliating, coercive, intimidating or harassing behaviour from anyone in our employ. This responsibility extends not only to all co-workers, but also to all people with whom we deal in conducting our business on behalf of the company.

Vortex Leisure will treat all complaints of harassment seriously, and ensure they are dealt with promptly, impartially and confidentially. If harassment is found to have taken place, appropriate disciplinary action will be taken.

## **Conflict of Interest**

---

Our basic belief of respect for the individual entails a strict regard for the privacy and dignity of each employee.

The Company will therefore not routinely involve itself in the private lives of its employees. However, a conflict of interest may arise where an employee engages in activities or advances personal interests at the expense of the Company's interests or the interests of other employees.

## **Gifts and Gratuities**

---

Employees should not accept gifts from a competitor or from anyone having or seeking business with the company.

Participating in business related functions, including accepting lunches or other meals with a supplier or competitor is a permissible business practice. However care should be taken to ensure these functions have an underlying business purpose and their value and frequency is not excessive.

## **Working Conditions**

---

The company will provide a safe, healthy and productive working environment. The abuse of prescription drugs or the use or possession of illicit drugs is not acceptable. Neither is the consumption of alcohol, where it affects customer service, other employees, work performance, public relations, safety or where it violates the law.

Smoking on Company premises is only permitted in designated areas. Any conduct, which is intimidating or offensive to our customers, suppliers, contractors, competitors, the public or other employees, will not be condoned.