



# EMPLOYEE HANDBOOK

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## The DCA Approach

At Duxton Capital (Australia) Pty. Ltd. ("DCA" or "Company"), we compete to be the leading global provider of financial solutions for demanding clients creating exceptional value for our shareholders and people. To ensure the highest level of integrity and consistency in all our actions, the following Employee Handbook has been developed. This document provides basic standards for all employees and should be read in conjunction with DCA's Code of Conduct.

We need to operate by our core values Performance, Innovation, Customer focus, Teamwork and Trust.

Concretely this means:

- We are committed to a result-oriented culture
- We are constantly challenging conventional wisdom and developing new solutions to meet customer requirements
- We place customers at the centre of our activities and they drive all that we do
- We benefit from the diversity of our people and our business by working together to achieve success
- We behave reliably, fairly and honestly

## Employee Dashboard

Every employee will be provided with log in details to DCA's Employee Dashboard. The cloud based platform enables employees and managers to track learning and development, administer leave, undertake dedicated online training modules and store employment related information including policies and procedures.

The Employee Dashboard is referred to through this employee handbook. The platform helps to create administrative efficiency and appropriate record keeping and storage of information.

## Probation

Employees commencing employment with DCA are ordinarily subject to a probationary period. Details of the probationary period are set out in your employment documentation. The length of the probationary period may differ from employee to employee depending on each employee's individual employment circumstances.

The purpose of the probationary period is to determine whether you are satisfied with the job offered by DCA and that you have the qualities necessary for, and are capable of, performing those duties assigned to you at the level of attainment required by the Company.

Continuation of employment beyond the probationary period is subject to the successful completion of the probationary period and the formal approval of the employee's manager.

## Salary and Payroll Administration

DCA employees are paid on a calendar month basis. Generally, salaries are credited to your nominated bank account on the second to last day of the month.

## Leave

DCA employees are subject to the Company's Leave Policy located on the Employee Dashboard. Generally leave guidelines are in accordance with the National Employment Standards.

Online leave forms are located on the Employee Dashboard.

## Expense Reimbursement

Expense reimbursements are subject to the Company's Travel and Expenses Policy which can be found on the Employee Dashboard. Expenses are lodged on the Expense Claim Form found on the Employee Dashboard.

## Mobile Phones

The use of company mobile phones is covered under the Travel and Expenses Policy located on the Employee Dashboard.

## Dress code

DCA adopts a 'dress for the day' code designed to provide a consistent professional appearance for clients and colleagues. Employee appearance reflects on the Company and staff must maintain a professional appearance and not offend customers, clients, or colleagues.

- Employees are expected to dress in business attire unless the day's tasks require otherwise – for example visits to farms/vineyards
- Employees must always present a clean, professional appearance
- Everyone is expected to be well-groomed and wear clean clothing, free of holes, tears, or other signs of wear
- Clothing with offensive or inappropriate designs or stamps are not allowed
- Clothing should not be too revealing

Managers are expected to inform employees when they are violating the dress code. Employees in violation are expected to immediately correct the issue. This may include having to leave work to change attire.

## Training

DCA understands the importance of supporting employee professional development to promote staff engagement and to ensure best business outcomes are achieved.

Employees, managers and Human Resources ("HR") should all collaborate to build a continuous professional development ("CPD") culture. It's an employee's responsibility to seek new learning opportunities. Managers have a responsibility to coach their teams and identify employee development needs. It is HR's responsibility to facilitate any staff development activities and processes.

A training budget is set each financial year to support professional development. In general, DCA encourages the following employee development aligning to business requirements:

- On-the-job training
- Job shadowing
- Job rotation
- Formal training sessions (individual or corporate)
- Employee coaching and mentoring
- Participation in conferences

Individual study agreements may be entered into by the Company and an Employee for study or training that involves a significant financial contribution by the Company. Examples may include participation in the Chartered Accounting Program or Chartered Financial Analyst studies. Study agreements will outline terms including payment of fees, study leave, repayment requirements if applicable and confidentiality.

### Process for requesting training

Employees wishing to participate in formal training incurring Company costs must submit a training request form on the Employee Dashboard for management approval.

### CPD and training records

All employees must record any training completed which is paid or unpaid to ensure the Company is capturing accurate data in relation to staff development. Training captured may include conferences, seminar, courses and other activities like lunch time sessions, webinars and breakfast events. Every employee has a learning profile where attendance at training and CPD activities can be recorded.

### Training Requirements for employee representatives and Responsible Managers

The training requirements for Representatives and Responsible Managers are as follows:

Role	Training Requirement
All Representatives	<p>Undertake continuing training to ensure:</p> <p>Maintenance of knowledge and skills appropriate for activities and responsibilities undertaken</p> <p>Update of knowledge and skills, especially in areas where there is continual change (e.g., legislation, regulatory policies and standards, economic and financial developments, new products and new market practices)</p> <p>Development of new knowledge and skills to assist with current role or roles contemplated in the near future.</p>
Responsible Managers	<p>Maintain and update their knowledge and skills to ensure their ability to provide organisational competence under the AFSL is maintained.</p> <p>Continuing training as per "All Representatives" above plus additional training on AFSL requirements as considered appropriate taking into account the role and knowledge of the Responsible Manager.</p>

The above training requirements include all relevant types of training and include but are not limited to compliance training. In addition to assisting in ensuring that the above requirements are met, compliance training is also an integral part of an effective compliance framework.

## Complaint Handling

The guideline below outlines a mechanism for reporting complaints in the workplace and the appropriate response to dealing with such grievances. DCA supports a culture that is open to feedback and actively provides transparency in its processes.

A grievance or complaint may be an expression of dissatisfaction as a result of the following:

- disagreements about the application of workplace policies
- performance or disciplinary action
- employee behavior including possible bullying and harassment
- disagreements about how work is allocated or managed
- any other perceived unfairness

This guideline should be read in conjunction with the Company's Whistleblowing Policy which deals with complaints associated with illegal, fraudulent or corrupt activities.

### Reporting a Grievance

If an employee wishes to report a complaint or grievance they can:

- Confront the person(s) involved and inform them that their actions, behavior, language was unfair, unreasonable, offensive, discriminatory and explain how it affected them, others or the work environment
- Speak to their manager about the complaint or grievance who may choose to informally speak to the person(s) involved
- The employee may wish to speak to Human Resources about their complaint or grievance
- The employee may wish to make a formal complaint in writing to their manager or Human Resources

The Company encourages complaints to be handled within the immediate work environment where possible.

### Formal Complaint Investigation

In the event a written formal complaint is submitted to a manager or Human Resources, the Company will investigate the complaint. Formal complaints will be investigated promptly, fairly and confidentially by Human Resources or an external investigator or mediator if deemed appropriate.

The investigation may involve the following:

- Providing the individual(s) who have been complained about, the opportunity to respond to the complaint
- Interviewing witnesses or persons involved
- Asking individuals to provide witness statement and/or
- Reviewing any relevant information or documentation provided or sourced

All employees will have the right to a support person during investigation discussions if requested.

A determination will be made about the probability of the complaint which may result in the following:

- Recommending additional training and development for employees or managers to assist in addressing the problem
- Monitoring the issue to ensure there are no escalation of issues
- Requiring an apology or undertaking that certain behavior or action stop
- Disciplinary action up to and including termination depending on the severity and/or
- Changing work arrangements

### **Confidentiality associated with a grievance**

Grievances and complaints will be treated confidentially. The Company will address complaints in a timely and confidential manner. Employee's will not be victimised because of raising genuine grievances.

It's important employees understand that in some instances, the Company has a legal obligation to conduct an investigation, for example cases that pose a threat to an individual's health and safety. As such, an individual's identity may be disclosed in the course of the investigation, and where possible the individual's permission to disclose their identity will be sought.

## **Disciplinary and Counselling**

DCA's disciplinary process is designed to ensure that the employee fully understand any areas of inadequate performance or behaviour and the specific improvements required to rectify the situation.

### **Informal Counselling – Early intervention**

Where performance or behaviour fails to meet DCA's expectations, or where a trend is emerging that could result in this outcome a manager will informally discuss their concerns with the employee in the first instance. It is recommended that early intervention occurs to provide the best chance of success for all parties. The manager will clearly identify the requirement for improvement and ways to support better performance. If there is no improvement, a formalised process will commence which should include the support from Human Resources.

### **Formal Counselling**

At all stages of formal counselling employees will be given the opportunity to respond to any allegations in a dedicated meeting or in the form of a written reply. If a meeting occurs, the employee will be offered the opportunity to have a support person present with them.

Formal performance or behaviour counselling may include the following actions:

#### **Verbal Warning**

When a manager provides a verbal warning, they will identify the area of concern and what is required to be improved. The manager will also state any particular timeframe for expected improvements to be met. The manager is to record the verbal warning by confirming the discussion via email and this is to be sent to the employee and Human Resources.

#### **Written Warning**

Similarly to a verbal warning, a written warning will identify any areas of concern, expected improvements and any review period associated with required performance. A written warning can be sent via letter or email and managers should engage with Human Resources when issuing a warning of this kind.

#### **Final Written Warning**

There may be circumstances concerning an employee's performance and/or conduct where a manager may decide to proceed directly to a final written warning instead of issuing a verbal warning or written warning. Human Resources must be engaged if a manager wishes to proceed to a final warning.

The final written warning must indicate that termination of employment may be necessary should the employee not meet the acceptable standards required.

## Termination of Employment

Termination of employment may occur where an employee's performance and/or conduct has failed to meet the required standard or if misconduct occurs that is so serious as to warrant proceeding directly to dismissal.

If after due consideration it is decided to terminate the employment of the employee, approval must be obtained from either the Chief Executive Officer or Group Chairman.

## Workplace Health and Safety

DCA recognises the need to take all practical action to safeguard the health, safety and welfare of our employees, client, contractors and visitors. We also recognise the importance of adhering to all relevant legislation. As such the Company will:

- Contribute to making the workplace a safe and healthy place and foster a safety practices
- Create a safe working environment and provide safe systems at work
- Ensure plant and substances be in a safe condition
- Provide any information, instruction, training and supervision as are reasonably necessary to ensure that each employee is safe from injury and risks to health

All employees, contractors and visitors are responsible for their safety and wellbeing. We therefore actively encourage everyone in the workplace to be involved in the identification, assessment and control of workplace hazards to ensure risks are reduced or eliminated. We rely on your input and cooperation to ensure our "WHS" processes are relevant and effective by:

- taking reasonable care to protect your own health and safety at work
- ensure you do not endanger any other person through any act or omission at work
- ensure the correct use of equipment provided for health and safety purposes

## Workplace Bullying and Harassment

DCA is committed to providing a workplace free from bullying, and harassment.

The Company has a zero tolerance to bullying and harassment and actions of this kind are not a part of the Company's culture. Company violence of any kind will also not be tolerated.

Examples of bullying include but are not limited to:

- the persistent use of abusive and offensive language
- continual criticism or insults
- persistent teasing or jokes
- purposely excluding others from work commitment or events
- setting unreasonable deadlines
- encouraging others to socially exclude an individual
- lying or spreading rumors about others

Examples of harassment include but not limited to:

- telling insulting jokes about a particular racial group
- sending explicit or sexually suggestive emails
- displaying offensive or pornographic posters or screen savers
- making derogatory comments or taunts about someone's race or religion
- asking intrusive questions about someone's personal life



Workplace bullying and harassment can be unintended where actions, which although are not intended to humiliate, offend, intimidate, distress or physically hurt, did cause and should reasonably have been expected to cause that effect. Therefore, what matters is the effect of a worker's behaviour, not whether there was a specific intent to bully or exert harassment.

#### General principles and definitions

**Bullying:** is repeated, persistent, unreasonable behaviour by one or more people, directed towards an employee, or a group of employees, that creates a risk to their health and safety.

**Unreasonable Behaviour:** means behaviour that a reasonable person, having regard to all the circumstances, would expect to victimise, humiliate, undermine or threaten; behaviour includes actions of individuals or a group, and may involve using a system of work as a means of victimising, humiliating, undermining or threatening.

**Harassment:** is unwelcomed or unreciprocated behaviour which makes a person feel intimidated, offended, or belittled in the workplace. Harassment is a form of unlawful discrimination. Harassment based on race, colour, sex, religion, political opinion, national extraction, social origin, age, medical record, criminal record, marital or relationship status, impairment, mental, intellectual or psychiatric disability, physical disability, nationality, sexual orientation, and trade union activity is also unlawful under Commonwealth laws and harassment such as physical assault can be a criminal offence.

**Sexual Harassment:** is unwelcome conduct of a sexual nature, which offends, humiliates or intimidates the person at which it is directed, regardless of intent. The behaviour may occur either at the workplace, or outside the workplace at workplace-related functions. The respective genders of the two parties is not relevant.

#### Responsibilities of Managers and Employees

**Managers:** will lead by example and will intervene when they witness bullying or harassment of any kind. They will take any complaints seriously and deal with them in a prompt, confidential and fair manner or escalate them to Human Resources if required.


**Employees will ensure:** they comply with this policy and treat others in a professional, courteous and respectful manner. Employee's must treat harassment, discrimination and workplace bullying matters seriously and report instances of this kind in a prompt and confidential manner.

**Human Resources will:** provide bullying and harassment awareness training and provide an appropriate framework for dealing with associated matters.

#### What does not constitute bullying and harassment

It is important all employees and managers are aware that management action which occurs in a fair and reasonable manner does not constitute bullying. Such actions include, but are not limited to:

- Performance management processes
- Constructive negative feedback or provision of performance or career advice
- Reasonable disciplinary action
- Legitimate action taken to transfer or retrench a worker
- A decision not to provide a promotion or acting appointment based on the worker's capability
- Allocating work in compliance with legitimate needs, systems and policies
- Business processes, workplace change or restructuring



### **Reporting Bullying and Harassment**

In the event an employee is experiencing bullying and harassment or witnesses this occurring within the Company, the first step should be to approach the individual who behaved inappropriately and let them know that their behavior is unacceptable and ask them to stop.

If the employee feels uncomfortable approaching the individual or if there is no positive result from the confrontation, the employee should report their grievance to their manager and if this is not appropriate to the Human Resources Manager.

Formal complaints of bullying and harassment will be investigated in line the company's complaint handling guideline. No one who reports bullying will be victimised and reports will be investigated in a timely, fair and confidential manner.

### **Consequences of bullying and harassment**

An employee who is found to have breached this guideline will be subject to disciplinary action up to and including termination of employment.

### **Alcohol and Drugs**

Employees are not permitted to work whilst intoxicated or under the influence of illicit drugs. A breach of this guideline will be regarded as a serious breach of an employee's obligations under their contract and may result in disciplinary action up to and including summary dismissal.

DCA has obligations with respect to the health and safety of all its employees and patrons.

No illegal drugs are allowed on the premises of DCA or any other business in connection to the Company.

## Fire Evacuation

In the event of a building fire, employees must make their way to the closest exit and safely congregate in the assembly area which is at Stirling's Steam Roller Park where a headcount will take place.

DCA will ensure the following

- a fire warden is appointed and adequately trained to deal with a fire and the evacuation of persons from the workplace in the event of an emergency
- Evacuation plans are available to staff outlining routes of escape and assembly points for employees and other occupants of the workplace
- The induction system for new workers includes adequate fire and evacuation training
- All new workers are provided a building orientation and shown evacuation process
- Each piece of fire fighting equipment is regularly checked and fully maintained and available for use as coordinated by the Office Manager



## Bushfires

### Understanding Bushfire Danger

Fire Danger Ratings are issued by 5pm daily during the fire season by the CFS. These ratings are determined in conjunction with Bureau of Meteorology (BOM). Ratings include: No fire Danger Rating, Catastrophic, Extreme Severe, Very High, High and Low Moderate.

### Travel during bushfire danger

Employees must consider travel arrangements carefully during severe, extreme or catastrophic fire danger days. Employees should consider their travel route or client's travel route and reschedule any meetings if not critical to business. Under no circumstances should employees drive through bushland during severe, extreme or catastrophic danger days for work purposes. An example would be driving to Kaesler Vineyard or Lenswood Apples through the Adelaide Hills from Stirling.

If a bushfire occurs whilst travelling, employees must make their way to a safer place immediately and notify their manager of their whereabouts as soon as practicable. Safer places are generally in Adelaide metropolitan area, outer suburbs and rural settlements. If travelling to a safer place is not possible, limited protection can be found at a last resort refuge which may be an oval or building in rural areas.

Employees must familiarise themselves with the CFS – Your Guide to Bushfire Safety on the Employee Dashboard which includes:

- Where to find warnings and updates
- During a fire, what to expect? What you might feel and disruptions to services like electricity, water and mobile phone coverage
- The importance of covering up with natural fibres to help avoid the risk of radiant heat
- How bushfires behave for example, embers, wind and wind change
- What to do if caught in a car or building during a bushfire

### Active Bushfire Danger

In the event of a bushfire threatening the Mt Lofty Ranges district, employees must make their way to a safe place immediately. Stirling is considered a safer place in the Mount Lofty Ranges district. Any manager can approve an employee's departure during threat of a bushfire but the employee must only decide to leave after making sure they consider the dangers of entering an area where fire is burning in close proximity. The employee must also notify their manager when leaving site.

## Incident Reporting

DCA is committed to maintaining a high standard of workplace health, safety and welfare in order to minimise the risk of an accident or injury occurring at work. If an incident or near miss occurs, timely reporting and investigation enables the Company to quickly act and take corrective action to address any hazards or incidents identified.

In the event of a workplace injury or accident or a “near miss” incident, DCA may investigate the incident in order to ascertain its cause and take the necessary steps to prevent a recurrence. Employees must comply with the below accident or injury reporting requirements:

- Once the injury or ‘near miss’ has been reported by the employee(s), it is the responsibility of the Manager to determine whether an investigation is required. If an investigation is required the following must occur:
- Investigate and complete an “Accident/Near Miss Report Form”
- Inform the directors of the incident as soon as practicable and supply a copy of the incident report within 24 hours
- When preparing the “Accident/Near Miss Report Form”, the supervisor or manager shall:
  - Speak to the employee about the accident/incident and obtain a full statement
  - Investigate whether correct safety procedures have been observed
  - Speak to witnesses to the accident/incident, if any, and obtain statements where appropriate
  - Inspect the scene of the accident/incident and ascertain, where possible, the cause or contributing factors to it

## Injuries at work / Workers Compensation Guidelines

If you are injured at work, immediately notify your manager and seek necessary first aid treatment. It is important workplace injuries are reported as soon as practicable (at an absolute maximum within 24 hours) to ensure employee safety.

If you need further medical assessment DCA can help you arrange to see a doctor. The doctor will assess you to decide what injury you have suffered and what kind of treatment you require. They can also issue a Work Capacity Certificate.

Together with your manager and the HR Manager you may decide to lodge a Return to Work claim. DCA will work together with you to ensure you receive the right treatment, care and support to help you recover and return to work as soon as possible.

A medical authority will be provided to you and can be returned to the HR Manager so DCA can liaise with medical practitioners to plan appropriate light duties or return to work program.

Employees must participate in activities that will assist recovery and return to work. They must also assist in the development of recovery/return to work plans (if required). Employees must also comply with any obligations set out in recovery/return to work plans and provide current work capacity certificates and recommendations from treating doctors. When requested, employees will meet with Management to discuss the recovery/return to work plan.

DCA will participate in the development of recovery/return to work plans. Where practical, management will provide suitable duties during recovery/return to work. Management are expected to support employees on their return to work through consistent communication.

## Return to work – for injuries outside of work

If an employee is injured at or outside of work and is unable to attend the office or can only complete partial work, a medical certificate or workplace capacity certificate is required. A medical authority form can be provided to the HR Manager so DCA can liaise with medical practitioners to plan appropriate light duties or return to work program.

If an employee is injured or ill, or there is reasonable reason to believe an employee may not be able to fulfil the inherent requirements of their nominated position for any period of time, management reserve the right to request an employee attend a nominated medical practitioner to obtain an independent medical evaluation based on the employee's usual occupation – this also applies in circumstances of work related injuries.

## Recruitment and Background Check Policy

DCA is committed to providing equal employment and advancement opportunities that are ethical, effective, fair and legal for all individuals. To protect the strong reputation of the business, DCA must take necessary steps to ensure employees are of good fame and character and possess integrity and honesty. As such, the following recruitment and background check guidelines exists:

- Applicants are not discriminated against according to age, race, religion, gender, sexual orientation, marital status, pregnancy or disability
- Confidentiality will be maintained, throughout and after recruitment, to ensure personal details are used for employment purposes only and employee documentation is appropriately stored according to privacy standards
- Conflicts of interest will be disclosed by existing employees on the selection panel of any recruitment
- At a minimum, one reference check should be obtained before any appointment if the candidate is not known by existing staff
- A satisfactory National Criminal History Record (police check) that is no older than three years, may be requested of any potential or existing employee. In the event of a disclosable outcome recorded on a police check, the strictest confidence will be maintained. A satisfactory police check will be determined by the Group Chairman at his/her discretion. A risk management approach to determining whether a police check is satisfactory will be taken based on the role that will be performed, the offence recorded, and timing of the offence recorded
- Bankruptcy checks may be requested by any potential or existing employee who may/will hold a position of financial responsibility or as requested by statutory obligations associated with being an Australian Financial Services License holder
- ASIC Register Checks may be undertaken for those who hold senior or influential positions within the company
- A Conflicts of Interest disclosure form will be completed by the applicant

All employees and managers have a responsibility to ensure the provisions of this recruitment guideline are adhered to and the principles of equal opportunity are upheld.

Conduct by an employee that falls outside the parameters of this policy must be reported to a manager as soon as practicable.



## Internet and Email Use Principles

DCA employees must make themselves familiar the IT Security Policy which is located on the Employee Dashboard.

### Social Media Guidelines

DCA acknowledges its employees, contractors and sub-contractors have the right to contribute content to public communications on websites, blogs and business or social networking sites not operated by DCA. However, inappropriate behaviour on such sites has the potential to cause damage to the Company, as well as its employees, clients, business partners and/or suppliers.

This policy sets out the appropriate standard of behaviour for all employees accessing social media websites and applications, including but not limited to; Facebook; Twitter; LinkedIn; Flickr; Instagram; You Tube; Tumblr; Wikipedia; personal blogs; written articles posted online; and any comments posted online made towards or in response to news items, publications or articles, during and outside of work hours.

### Social Media Use Principles

- Do not post material that could be construed as harmful to; the Company; its employees and/or its customers; any regulatory bodies; or any relevant third party including vendors and suppliers. Although not an exhaustive list, some specific examples of prohibited social media conduct includes; posting commentary, photos or content that could be classed as defamatory, pornographic, and harassing, or that could create a hostile working environment.
- If you have, or obtain, access to any social media site in the name of the Company, you will use such for business purposes only, you will separate this from any personal accounts and will post only that which is approved by senior management.
- Publishing, posting or releasing information that is considered confidential, on personal accounts or business accounts, is strictly prohibited and will likely result in disciplinary action, and depending on the severity, may include termination of employment. This includes but is not limited to, employee and customer personal details or correspondence, company grievances involving any member of staff, and financial details or potential transactions for any customer/employee or relevant third party.
- Obtain appropriate permission before referring to or posting images of current or former employees, vendors or suppliers, to use a third party's copyright, copyrighted material, trademarks, service marks or other intellectual property, on either personal or business accounts.
- While permitted to associate yourself with your employment and duties during employment, you will do so accurately and subject to the above requirements.
- A breach of this policy will result in disciplinary action and in serious cases may lead to termination of employment.

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