

# Employee Handbook

CompareForexBrokers

# Policy Handbook

A detailed guide to policy and procedures at Compare Forex Brokers

## Contents

Purpose of this Handbook	2
Welcome	3
Our Mission, Vision & Values	3
Culture is everyone's responsibility	3
Business Referral Scheme	4
Employee Referral Scheme	5
Training and Development Scheme	6
Sustainability	6
Social & Community Impact	6
Culture Team	7
General Admin	8
Where to Find Us	8
Your Role	8
Payroll	8
Hours of Work	12
Days in the office	13
Security	13
Policies	15
Leave Policy	15
Flexible Work at Compare Forex Brokers	22
Alcohol, Drugs & Smoking or Vaping at Work	24
Code of Conduct	25
Professional Appearance	26
Anti Bribery and Anti Corruption	27
Conflict of Interest	28
Diversity, Anti-Discrimination and Equal Employment Opportunities (EEO)	29
Resolving Problems	35
Workplace Health and Safety	38
Working From Home	41
IT Data and Security	42
Privacy and Confidentiality	46
Compare Forex Brokers - Declaration	48

# **Purpose of this Handbook**

We hired you because we think you are great! We also know trust is the basis for any good relationship. This handbook helps ensure we are clear on the ground rules so we can protect your wellbeing and our working relationship.

We also value common sense – if in doubt, apply this principle and lean on your handbook as a supportive guide. We hope it provides clarity in the nitty gritty and if anything is unclear don't be afraid to ask your manager.

Please also note that if we (you and our leadership team) feel that a particular policy isn't working we will review it and have the license to change it at any time to suit the circumstances better.

# Welcome

Compare Forex Brokers is primarily about helping traders find the right broker for their needs and raising knowledge levels around trading. Employees and our customers will reflect the value that Compare Forex Brokers places on; people, teamwork, bottom-up management and our commitment to superior customer service.

## Our Mission, Vision & Values

### Mission Statement

To help traders make informed, confident decisions by providing transparent, independent, and data-driven comparisons of forex and CFD brokers worldwide.

### Why Customers choose Compare Forex Brokers

- Unbiased reviews of individual brokers
- Straightforward methodology, ranking brokers based on different segments of the markets (eg countries, platforms, requirements)
- Real-world experience (without AI) from writing, videos to images

### Our Values

- **Frodo** - Willing to go to the end of the earth for each other and a righteous cause
- **Han Solo** - Encourage each other to take risks and have fun in the process
- **Holmes** - Ruthless in the pursuit of the truth and being an individual

### Culture is everyone's responsibility

At Compare Forex Brokers we understand culture is everyone's responsibility. We accept the part we all play in creating our culture to be respectful, supportive, united and FUN!

# Employee Referral Scheme

As a service based business Compare Forex Brokers looks to employ the best available staff. If you introduce someone to the business who is subsequently employed, you are eligible for a referral bonus.

## ***Rules of the Scheme***

For the Referral Bonus to be made to the introducer, the Compare Forex Brokers Digital management team must be in receipt of the following:

Proof that the referral was actually provided, and;

- Period from referral to subsequent employment must be no longer than six months;
- Employee must pass their probation;
- Introducer must still be working at Compare Forex Brokers.

## ***Remuneration***

Level	Referral Bonus
Executive	\$2,000
Manager	\$3,750
Director	\$5,000
C-Suite	\$7,500

*Please note that the payment of the Employee Referral Bonus is discretionary and always subject to management approval. In the event that there is a dispute about whether or not you are eligible for a Referral Bonus, the Company has the right to make the final decision without any right of appeal by you. The Company reserves the right to amend or withdraw the Bonus Scheme in full or in part without prior notice.*

# **Training and Development Scheme**

Compare Forex Brokers will give employees adequate training to do their job safely and competently. Our business believes training is a two-way process and encourages employees to participate and highlight any gaps in their own skills or knowledge they believe they have.

Training can include internal on-the-job training, written instructions such as standard operating procedures, coaching, external training and courses.

All employees are expected to take two full days of training per quarter. The courses you are expected to take are based on your role / position within Compare Forex Brokers. Most are online and have an associated accreditation.

You will be provided with a list of courses we support and as part of your PDP you will be directed to take certain courses. There is also Nunn's Digital Academy that you might be asked to participate in.

The company reserves the right to amend, change or remove this benefit as it sees fit.

# **Sustainability**

Compare Forex Brokers values the environment and aims to incorporate good environmental practices into its operations. Compare Forex Brokers acknowledges that resource conservation, waste reduction and environmental risk management are imperative to a sustainable environment. Compare Forex Brokers is committed to integrating these key concepts into day- to-day operations.

Where possible, Compare Forex Brokers aims to seek out suppliers who share the same environmental approach. Compare Forex Brokers is committed to complying with all applicable environmental laws and regulations.

# **Social & Community Impact**

We have a range of initiatives to improve the world we live and work in. Our Community team give back to the community and society through initiatives built around the below pillars:-

- Time in community
- Fundraising events
- Donations and drives

# Culture Team

Where the fun never stops, and the culture never sleeps!  We're the crew dedicated to turning every workday into a celebration. From celebrating our wins with style to sharing insider tips on the coolest spots in town, we're your go-to for all things enjoyable. So, buckle up and get ready to dive into a whirlwind of excitement, as we make Compare Forex Brokers the ultimate playground for work and play! 

# General Admin

## Where to Find Us

We occupy one floor of an office space at Suite 1, Level 2, 230 Balaclava Road, Caulfield North, Victoria. Surrounded by public transport and incredible restaurants and cafes.

## Your Details and Records We Keep

You each have a personnel file containing the details of your employment and associated conditions, mostly we like to save stuff in the cloud. Your file will be used to store your employment documents. Please keep us updated with any changes of details to this information.

## Your Role

Your role at Compare Forex Brokers is covered by your Contract of Employment, your Position Description, and our policies outlined in this Handbook. The following section contains general information regarding your pay, leave, and other basic legal stuff and it will be subject to change.

## Payroll

We process payroll monthly and is paid on 15th of the month. Payments are made directly into the bank or credit union of your choice. In the event that the regular payday falls on a weekend or a public holiday, payment will usually be made on the last working day before the scheduled pay date. Team members are paid two weeks in arrears, and two weeks in advance.

Changes to bank account details, and other important information i.e. home address we should be aware of should be communicated to Noam Korbl as soon as possible.

So that we can pay you on time and correctly you need to make sure that you accurately fill out the Employee Details Form, in particular the exact details of the Bank Account you wish your pay to be directed to including correct name details. If there is a change in details, you must let us know ASAP to ensure you are paid on time.

When you start your job, you will need to fill out and return a Tax File Declaration form. If we do not have one of these, we are compelled by law to charge you the maximum tax rate. A superannuation fund nomination form will be provided for you to fill in. If you have a query about your pay, please email [hoda@CFBgroup.co](mailto:hoda@CFBgroup.co) to follow it up for you.

## Taxation

Automatic tax deductions are made from your pay each pay cycle. Each team member can

view their year-to-date income summary by logging into their MyGov account at any point throughout the year. This will show your year-to-date salary and wages, the tax that has been withheld, and the reported amounts of the employer superannuation. Group certificates are now available via the myGov website at the end of the financial year.

## **Superannuation**

Employer Superannuation contributions at 11.5% (this will change to 12% from July 1, 2025) are paid into your chosen personal superannuation fund; with the amount paid based on your ordinary earnings. Your payslip has a section that indicates the applicable amount on your behalf, so each month you know what is going in there! A standard choice form will be provided to all eligible employees within 28 days of starting work, and if at any time during your employment you wish to increase your voluntary contribution, please contact Noam ([noam@compareforexbrokers.com](mailto:noam@compareforexbrokers.com)).

## **Probation**

Probation helps clarify expectations and not leave you in the dark. It means we diarise a 3 and 6 months check in to make sure you are clear on the expectations of your role and are supported in succeeding in your role. You will know in the lead up to the end of your probationary period if there are concerns – there are no surprises, and we won't spring it on you.

## Travel Expenses

Compare Forex Brokers realises that work-related travel and expenses may be incurred by employees during the course of their employment. Compare Forex Brokers tries to ensure that these expenses are kept to a minimum and if incurred, are reimbursed in a timely manner.

We have the following business accounts which can be used for work related travel:

### Expenses

Expenses are to be lodged in Xero, following the below instructions:

Fill in all fields including the reference

The reference should be the client's name or 'company event' or equivalent – please refrain from saying things like after work beers

Please add a new line instead of doing all expenses individually – as seen below in yellow below

Approve Receipt

Receipt from	Date	Reference	Total
Uber	22 Jan 2015	Money3 Taxi	63.11
<input checked="" type="checkbox"/> Include Tax Line item amounts are: <input type="radio"/> Tax Exclusive <input checked="" type="radio"/> Tax Inclusive			
Description	Quantity	Unit Price	Amount AUD
Money3 Taxi	1.00	63.11	63.11
Account <small>(?)</small>	+Add	Tax Rate	Production <small>(?)</small>
493 - Travel - National	+Add	GST on Expenses	Paid <small>(?)</small>
<b>Add a new line</b>			Subtotal 63.11
			Includes GST at 10.00% 5.74
			<b>TOTAL 63.11</b>

**Back** **Approve** **Decline** **Delete**

## Expenses Codes

- Travel to and from a client / biz dev meeting including flights and taxis;
  - 401 Marketing – Travel (gst. on expenses if domestic)
  - 401 Marketing – Travel (gst. free expenses if international)
- All client / biz dev entertainment;
  - 402 Marketing – Entertainment (gst free expenses)
- Anything relating to staff training including travel, hotels and food;
  - 480 Staff Training (gst on expenses)
- All staff only entertainment;
  - 481 Staff Entertainment (gst free expenses)
- Travel to and from a work but non-client event domestically;
  - 493 Staff Travel Domestic (gst on expenses)
- Travel to and from a work but non-client event abroad;
  - 494 Staff Travel International (gst free expenses)

### Travel expenses (flights)

All domestic travel will need to be approved by the CEO prior to travel.

Please send your travel requirements through to your team leader for approval prior to any bookings.

You can claim up to \$100 per day for food costs (breakfast lunch and dinner) if you are travelling for work outside normal base of operations during an overnight visit. If you are only travelling for the day you can claim up to \$30 for lunch. Tax invoices need to be provided and claimed through the normal expense process.

### Hours of Work

You will work 8.5 hours per day, with an hour lunch break, Monday to Friday, plus any reasonable additional hours that are necessary to fulfil your duties or as otherwise required by the Employer. You can start work at 8 am, 9 am or 10 am.

Your hours of work will be managed along with your leadership team based on the requirements of your role and will be reviewed in line with the business needs. We adopt a

commonsense approach to managing hours of work and work-life balance. As salaried employees, you are required to work the hours needed to get the job done and won't be entitled to overtime.

A lunch break is encouraged to be taken during the day to ensure you maintain a healthy work-life balance. The timing of your break can be flexible, in line with your workload and team schedule.

### **Days in the office**

High performing well connected teams understand the impact and importance of collaboration, connection and learning. The office has been specifically designed to support these important aspects of our culture. Our office is fully functional five days a week and we encourage all team members to come in every day, but currently at a minimum you will be required in the office 2 days – Thursday is compulsory, and your team will agree a second day when you will be expected to be in the office. This will change based on client and market requirements where additional days may be required.

Please refer to the flexible workplace policy for individual requirements. This helps us to connect as an organisation and these are the days we will schedule all staff meetings and agency wide initiatives.

Culture Team events may happen outside of these days and attendance is encouraged for FUN! A flexible mindset is required for client meetings and important planning days. Refer the flex work policy for more detail.

### **Security**

#### **Office Access**

Entry to the Compare Forex Brokers premises during and / or outside of normal business hours will be by way of security pass.

It is the responsibility of every Compare Forex Brokers employee to ensure that security passes are kept in safe custody. They must be returned on demand.

If security passes are lost or misplaced, you must notify your manager immediately so that they can be cancelled.

Employees must ensure that all confidential/sensitive documents are locked away at night. You should make sure that your personal belongings and valuables are locked away and secured. Personal property is not covered by Company insurance.

## **Kitchen and Bathrooms**

Please keep the kitchen and bathroom areas clean at all times, cleaning up after use. You should be mindful that these are public areas, and you should be respectful to others by always cleaning up after yourself. If you use dishes, cups, glasses or cutlery then place them in the dish washer immediately. If the dishwasher is full and dirty, you are expected to turn it on. If it is full and clean you are expected to empty it.

Toilets at Compare Forex Brokers are unisex.

If there are any issues with these facilities, you should notify your manager immediately.

## **Booking meeting rooms**

If you need to book or use a meeting room, please ensure that you book through the email booking system. Please tidy up after meetings, take away your dirty cups, clean the whiteboard etc. Place chairs back in position and clean all work away.

## **Printing**

We are always working to reduce our impact on the environment so please whenever possible use technology to communicate and if you must print things out always print on both sides of paper and stick to black and white ink as much as possible. Colour printing should be kept to a minimum.

## **Waste Bins**

Most individuals will have these near their desk. These bins should be used for any items which are not recyclable e.g. plastics, metal, a pen, food scraps etc. Please use your discretion and be mindful of disposing food scraps in the office. Liquids should not be poured/ placed into bins.

## **Recycling Bins**

Please recycle where you can, using the appropriate bins – paper, cardboard and separately plastic, glass and tins. With paper and cardboard please break down any cardboard boxes. NO general rubbish is to be placed in these bins.

## **Noise**

Please be mindful of the noise that you make in the office, talking loudly or shouting across the room can be disturbing to the rest of the team. Please keep talking on the telephone to a normal level and respect others around you.

# Policies

## Leave Policy

Our employees have a variety of leave entitlements (paid and unpaid) that allow them to balance work with rest and recreation, family responsibilities and other specific purposes.

We understand a safe and healthy workplace enables people to take leave, which provides you with an opportunity to refresh yourself away from the work environment. We believe taking a break to recharge and rest allows you to be more productive and energised! This Policy provides general guidelines of our expectations of you as a team member of Compare Forex Brokers and your responsibilities as an Employee.

### Scope

Paid leave applies to all full-time and part-time team members with pro-rata entitlements for part-time staff based on the number of hours worked per week. Casual Employees are not entitled to paid leave entitlements, except Long Service Leave and Family and Domestic Violence Leave.

You don't have to wait a full 12 months to take your annual leave, you can take it (subject to approval) as it accrues. In fact, to support your wellbeing, we encourage taking your annual leave at least every 12 months.

Whilst on leave, whether paid or unpaid you must not engage in any other form of paid employment. (Please note this does not apply to casual team).

### Annual Leave

Full time employees and part time employees are entitled to 20 days of annual leave per year, based on the ordinary hours of work (the entitlement is prorated for part timers).

Before you take a period of annual leave, you need approval from your manager. Please set up a meeting to discuss the dates and duration of your leave request to seek approval prior to booking anything. Annual leave is not approved until your manager has confirmed it and it is entered into Xero and formally approved.

Annual leave requests will not be unreasonably refused, however operational needs and staffing levels will be taken into account when considering your request. To assist with planning and supporting your team the following notice periods should be used as a guide.

<b>Annual leave duration</b>	<b>Notice</b>
3 weeks or more	3 months
1-2 weeks	1 month
2-4 days	2 weeks
1 day	1 week

Approval from your manager is required for all annual leave requests, so please don't book anything before you have had it confirmed.

As detailed in your employment contract, the Company usually shuts down over the Christmas-New Year period each year. You must take annual leave during this period. If you do not have sufficient accrued annual leave to cover the entire period, you may need to take a period of leave without pay or the Company may at its discretion agree for you to take a period of annual leave in advance.

Unless otherwise agreed with your manager, you should not have more than 8 weeks' annual leave accrued at any time. If you have more than 8 weeks' accrued annual leave at any time, the Company may direct you to take a period of annual leave.

### **Bonus Annual Leave Scheme**

Compare Forex Brokers recognises the importance of work-life balance and encourages its employees to make full use of their annual leave entitlements. In addition to the government minimum entitlements, Compare Forex Brokers provides all staff with an additional 5 days of paid leave per financial year.

#### **The scheme works on the following basis:**

- Five Bonus Leave Days are made available to an employee only when they have used their full 20 day annual leave entitlement in that financial year
- Bonus Leave Days will not be paid out to an employee
- Bonus Leave Days do not have to be taken all at once
- Use it or lose it: Unlike annual leave, any bonus leave days not taken within the 12 month period, cannot be carried over to the next year.
- You are not eligible for any of these bonus days if you have carried over statutory days from the previous year.

## Applying for annual leave

Annual Leave should be submitted via Xero by all team members. Leave needs to be submitted to Xero as soon as possible before the leave commences and after discussing with your manager. Please note when entering leave hours: 1 day leave = 7.6 hours

In Xero, please follow the following prompts:

- Click the 'Leave Tab'
- Click on 'New leave request'
- Select 'annual leave' as the type of leave requested
- You will also be required to enter a description of your leave, select your manager as the approving manager along with the start and end date of the leave request.

Your approver will either approve or reject your request.

Your current available annual leave balance is displayed (in hours) under the "Leave" tab in Xero. You can check here to ensure you have accrued enough leave prior to putting in a leave request. If you want to check a future leave balance, please email Noam Korbl.

## **½ Day 'Summer Friday' Leave Scheme**

In addition to any government issued leave and the Bonus Leave Scheme above, Compare Forex Brokers is pleased to provide its employees with a paid Summer Friday Leave Scheme.

### The scheme works on the following basis:

- Each month, from November to March inclusive, all employees are entitled to take one half day on a Friday of their choosing
- Requests for a 'Summer Friday' are to be made two weeks in advance and are at the discretion of your line manager
- Requests must be entered into Xero
- ½ days cannot be combined to form a full day of leave
- ½ days cannot be carried over and will not be cashed out
- A Summer Friday that has been approved may be retracted at any time if the employee has outstanding work, or if it would be or if it would negatively impact the company

## **Personal (previously sick leave) or carers leave**

Permanent employees are entitled to 10 paid personal leave days per year for full timers and pro rata part timers.

Personal leave may be used when you are unfit for work due to personal illness or injury.

It could be a common cold, a broken leg or mental health reasons such as anxiety and depression. These days are for you to use when you need time to rest and get back to your healthy self.

Carers leave is to support you in caring for a member of your immediate family or household because of their personal illness, injury or unexpected emergency.

An immediate family member is a:

- Spouse or former spouse
- De facto partner or former de facto partner
- Child
- Parent
- Grandparent
- Grandchild
- Sibling, or
- Child, parent, grandparent, grandchild or sibling of the employees' spouse or de facto partner (or former spouse or de facto partner)

This also includes adoptive relations and step-relations such as step-parents and step-children.

If you need to take personal or carers leave, where possible, inform your manager prior to your normal start time preferably via phone call. If this is not possible, please text or email your manager and reception (as soon as possible).

If you have been unwell for more than 2 days, we require a medical certificate. Sick days that immediately follow a holiday will automatically require a medical certificate. Medical certificates are to be sent to Hoda.

If you use all of your personal or carers leave and need to take more leave, you may request to use your annual leave. In the event that you have exhausted your personal leave and are unable to use your annual leave, your leave will be processed as unpaid.

## **Compassionate Leave**

Losing someone who is important to you can have an emotional impact and may require some time to heal. Team members are entitled to two days of compassionate leave if;

- a member of your immediate family or household has developed a life-threatening illness or injury.
- A member of your immediate family dies.
- A baby in your immediate family or household is stillborn
- You have a miscarriage, or
- Your current spouse or de facto partner has a miscarriage.

Compassionate leave is a paid entitlement of 2 days per occasion for permanent Employees. Casual employees are entitled to unpaid compassionate leave. Compassionate Leave is not cumulative. In addition, we commit to applying our Compare Forex Brokers care factor to work with you to support your needs during this time.

## **Long Service Leave**

Under the NSW Long Service Leave Act 1955, an employee is an employee is eligible to take long service leave (LSL) after the completion of 10 years' continuous employment with one employer. Long service leave entitlements vary by state.

Under the Victoria Long Service Leave Act 2018, an employee is eligible to take long service leave (LSL) after the completion of 7 years' continuous employment with one employer.

Long service leave entitlements vary by state.

An employee can request to take LSL at any time after becoming entitled to take the leave. Leave can be taken for any period of not less than 1 day at a time.

If an employee makes a request to take LSL, the employer must grant the leave as soon as practicable unless the employer has reasonable business grounds for refusing the request.

If your work pattern has varied between full-time and part-time in the course of your employment, this will be taken into account in determining the rate of pay while on Long Service Leave.

People terminating their employment with Compare Forex Brokers and who meet the eligibility requirements may be entitled to being paid out their accrued Long Service Leave.

Long service leave cannot be paid out (unless you are no longer employed by Compare Forex Brokers). It is an offence under the LSL Act 2018 to give or receive payment instead of the employee actually taking the break from work.

An employee can request to take a period of LSL for twice as long as the period to which they

are entitled, at half their ordinary pay. If an employee makes a request to take their LSL in this way, the employer must grant the request unless the employer has 'reasonable business grounds' for refusing the request. On the other hand, an employee cannot take half of their leave entitlement at double the rate of pay.

When requesting long service leave, please complete a leave form for your manager to approve. Approved long service leave forms are to be shared with reception and Hoda.

### **Family and Domestic Violence Leave**

If you are experiencing domestic violence, we are here to support you. You can apply for flexible working arrangements or leave to help you obtain help, attend court, or make necessary arrangements to create a safe situation.

Compare Forex Brokers team members are entitled to ten (10) days paid leave of Family and Domestic Violence Leave from the date they commence with us. This entitlement resets on the employees work anniversary and does not accumulate from year to year

Family and Domestic Violence Leave does not break an employee's period of continuous service (or affect your Long Service Leave entitlements). Still, you won't accrue any entitlements while taking this type of leave. If you apply for leave or flexible working arrangements because of family and domestic violence, we may ask you to provide documentation issued by a court or the Police, family violence support service documents or a statutory declaration.

If there's an emergency involving domestic violence, and you can't apply for leave in advance, explain the situation (and how long you think you'll need off work) to your Group Account Director and they will work with you to support you. Please note that if your family and domestic violence leave entitlement is accessed, it will not be reflected on your pay slip in order to keep the matter highly confidential.

### **Parental Leave**

We love Compare Forex Brokers babies and parents. Our policy is so comprehensive it has its own document. (This policy is currently being updated)

Please complete a leave form for your manager with an estimated commencement date for your leave. Leave forms are to be sent to Hoda and Gary.

## **Jury Service**

If you are selected for Jury duty you are entitled to be absent from work to perform this community service. On a needs basis we may provide you with a letter asking you to be excused from this duty.

All full-time and part-time team members of Compare Forex Brokers will be given up to ten days paid to attend Jury Service. If these days fall on a weekend or any other day you do not normally get paid.

An individual (other than a casual) is entitled to 'make-up pay' for the first 10 days that they are absent for a period of jury service. This means we Compare Forex Brokers will top up the government payment we receive to cover the period of duty to reach your normal pay grade. Any days in excess of 10 days may be paid, however this will be at management discretion.

When you are required to attend Jury Service, please inform your manager.

## **Leave Without Pay**

Nunn Media is committed to a flexible approach to leave where possible and we acknowledge that from time to time there may be a need to use approved leave without pay. Leave without pay may be approved at the discretion of your manager if you have run out of Annual Leave.

## **Policy Breaches**

Compare Forex Brokers treats this Policy as serious, and any breaches will be managed accordingly, up to and including dismissal.

# Flexible Work at Compare Forex Brokers

Our flexible working arrangement policy outlines our provisions for employees who want to change their working hours, days, weeks or location. Compare Forex Brokers has developed a hybrid approach designed to enable a high-performance, results-based work environment where highly engaged individuals, groups, and leaders can thrive. This policy sets out the terms and conditions under which Compare Forex Brokers will authorise flexible working arrangements.

## Scope

This policy applies to all eligible employees. Flexible working arrangements are meant to be responsive to the changing needs of the workplace and should be reviewed and updated both as needs change and, at a minimum, annually.

## What is a flexible working arrangement?

A flexible working arrangement is an Employee right to request a variance to the terms of the employment arrangement. This right to request a flexible working arrangement is governed by the National Employment Standards (NES). Examples of flexible working arrangements may include changes to:

- An employees hours of work (including start and finishing times or a reduction of hours. Please note a team member cannot request to reduce hours to zero);
- An employees pattern of work (including job sharing or split shifts);
- An employee's location of work (including working from home).

## Eligibility

Permanent team members who have at least 12 months of continuous service and casual team members who have been employed on a regular and systematic basis for at least 12 months by Compare Forex Brokers and who have a reasonable expectation of continuing employment may be eligible.

Employees are eligible to request a change if they require flexibility because:

- They are pregnant
- they are a parent or have responsibility for the care of a child who is of school age or younger;
- they are a carer;
- they have a disability;
- they are 55 years of age or older;
- they are experiencing violence from a member of their family; or

- they provide care or support to a member of their immediate family, or a member of their household, who requires care or support because the member is experiencing violence from the member's family.

If the request is accepted, Compare Forex Brokers may:

- Specify a review date of the flexible work arrangement
- Make the approval subject to certain conditions, including, but not limited to, changes in supervision, monitoring or other systems to facilitate the request.

### **Flex that works**

Flexible working arrangements must enable a net-neutral or net-positive result on business results and the work environment. In other words, the same work is getting accomplished at another time, in another place, or in another way, and is having a positive effect. When business results or social connection is disrupted, Division Heads will empower Employees to explore pragmatic approaches and to understand what other options are available, should the arrangement become untenable.

### **How to request flexible working arrangements?**

To be able to consider an employee's request for flexible working arrangements, an employee must:

- request in writing;
- set out the details of the change sought and the reasons for the change
- provide four weeks' notice;
- specify the proposed effective date.

If the request cannot be accommodated, Compare Forex Brokers will state the reasons why and may propose a variation of the original change in working arrangements sought in the flexible work request.

### **Confidentiality still applies**

Please also be sure to take care of Compare Forex Brokers documents whilst working from home to ensure they are only accessible by you and no other members of the house.

# Alcohol, Drugs & Smoking or Vaping at Work

Compare Forex Brokers wants to minimise the harm associated with the use of alcohol and other drugs to their workforce and the wider community and to provide the community with a responsible ethos and behaviour that embodies it. We recognise that the inappropriate use of alcohol and other drugs (including smoking and vaping) can adversely affect workplace safety and performance and can also contribute to absenteeism and reduced morale.

## Our promise

- 69 Reservoir Street is a Smoke and Vape free space (including entrances)
- Compare Forex Brokers is committed to providing a safe, healthy, and productive workplace that actively promotes the health and well-being of the teams;
- Compare Forex Brokers is committed to ensuring that the possession, use, or sale of any drug in any areas controlled by Nunn Media is in accordance with relevant State and Federal laws and regulations;
- On occasions where alcohol consumption is permitted by this Policy, Compare Forex Brokers encourages low-risk, responsible use of alcohol and low-risk drinking at work-related functions; and
- Compare Forex Brokers is committed to a zero-tolerance approach to team members adversely affected by alcohol or other drug use.

## What about the Christmas party?

There may be times when alcohol is available at sponsored events, or on the company premises. It's then up to each individual to ensure that the consumption of alcohol is kept to relevant limits and appropriate standards of behaviour are maintained.

# Code of Conduct

At Compare Forex Brokers, we know that our people contribute to the success of our business and in turn, our clients. You have an obligation to Compare Forex Brokers, our clients and yourselves to observe high standards of integrity and fair dealing. Unlawful and unethical business practices undermine team and client trust and will not be tolerated. Honesty and integrity above all else!

These behavioural guidelines affirm our belief in responsible social and ethical conduct by all who work for us. This Policy clarifies the standards that Compare Forex Brokers expects of our people.

The following principles outline the Code of Conduct to follow when conducting business, working with others, or in dealings with clients and partners on behalf of Compare Forex Brokers.

## **Nunn Media Principles**

- Act with and maintain a high standard of integrity and professionalism;
- Promote the interests of Compare Forex Brokers;
- Perform duties with skill, honesty, care and diligence;
- Maintain a professional appearance at all times;
- Be responsible for maintaining our reputation;
- Be trustworthy in the proper use of Company information, funds, equipment and facilities;
- Be considerate and respectful of the environment and others;
- Abide by policies, procedures and lawful directions that relate to your employment with Compare Forex Brokers and/or our Clients;
- Exercise fairness, equality, courtesy, consideration and sensitivity in dealing with others;
- Avoid conflict of interests by promptly disclosing to Compare Forex Brokers senior management, anything which may constitute a conflict of interest;
- Avoid the perception that any business transaction may be influenced by offering or accepting gifts; and
- Under no circumstances offer or accept money.

# Professional Appearance

Has anyone told you, you look lovely today! We take pride in our professional appearance at Compare Forex Brokers. With this in mind, it is important for Compare Forex Brokers employees to;

- Maintain a neat and tidy appearance during work hours.
- Keep their hair clean, well-groomed, and styled in a way that does not obstruct vision.
- Wear professional attire – this includes avoiding torn/ripped clothing, clothing that is too revealing or clothing that has offensive words or images
- Wear appropriate footwear – this includes no thongs.

In addition, it is important that Compare Forex Brokers employees demonstrate a high level of personal hygiene both in the office and at client meetings.

# **Anti Bribery and Anti Corruption**

Employees must not engage in bribery and corruption or request any third party to do so on behalf of themselves.

Bribery is when someone offers or promises, directly or indirectly, a benefit or anything of value (including non-monetary benefits like gifts) to another person, with the intention of improperly influencing someone in order to obtain or retain business or a business advantage that is not legitimately due. Corruption is the abuse of power for private gain.

Any employee who violates this policy will be subject to disciplinary action.

## **Gifts**

Compare Forex Brokers strictly prohibits soliciting gifts or favours from other employees, associates or media partners with whom you deal with as part of your employment relationships and responsibilities. Employees should always take responsibility to ensure any such gift of favour does not lead to an unfair change of preference or conflict of interest. As a rule, any gift to the value of \$300 or more should not be accepted unless given approval by your manager. For any gifts over \$1000, it will need to be approved by Gary Nissim.

## **Breaches of these guidelines**

We expect co-operation and enthusiasm from all people, conducting themselves in a professional, ethical and socially acceptable manner of the highest standards. Any team member who raises a complaint or discloses an alleged breach of this policy, whilst following correct reporting procedures, will not be disadvantaged or prejudiced.

However, anyone in breach of these guidelines may be subject to disciplinary action, including termination. All reports will be dealt with in a timely and confidential manner.

# Conflict of Interest

Employees have an obligation to disclose any conflicts of interest they may have, and comply with this policy to ensure they effectively manage conflicts of interest as representatives of Compare Forex Brokers.

A conflict of interest occurs when a person's personal interests conflicts with their responsibility to act in the best interest of our business. Personal interests include direct interests as well as those of family, friends or other organisations a person may be involved with or have an interest in (indirect).

A conflict may be actual, potential or perceived and may be financial and non-financial. These situations present the risk that a person will make a decision based on, or affected by the influences., rather than in the best interest of Compare Forex Brokers.

In the event that an actual, potential or perceived conflict of interest is identified, it must be reported to your manager immediately.

It is expected that Compare Forex Brokers employees will avoid conflicts of interests where possible and follow the appropriate reporting expectations as soon as possible in the event a conflict is identified.

# Diversity, Anti-Discrimination and Equal Employment Opportunities (EEO)

At Compare Forex Brokers, we want our people to want to come to work! So, it's everyone's responsibility to act in a way that creates a workplace environment that supports and encourages diversity, and is free from discrimination, harassment, bullying and victimisation.

Our teams are expected to proactively implement and support this ideal. Compare Forex Brokers will not tolerate behaviour inconsistent with this and termination of employment is a real result that can come from not adhering to these principles.

## Diversity

Valuing diversity is about respecting the unique differences that individuals bring to our business.

Diversity in the workplace focuses on improving the performance of the business by valuing the contributions of people from different backgrounds, experiences and perspectives, as well as the implementation of the practices that enhance the performance of all staff ensuring that individuals will not be disadvantaged by their differences.

Our principles relate to the following areas:

- Gender Balance – supporting and empowering our team members to access and enjoy the same opportunities across all levels, regardless of gender or gender identity;
- Access to Paid Parental Leave and Flexible Working – supporting and empowering our team members to balance their work, family and caring responsibilities;
- Pride Community – enable our LGBTQI community to be their authentic selves;
- Indigenous Australians – provide more opportunities for Aboriginal and/or Torres Strait Islander peoples;
- Free from discrimination – provide a workplace that promotes the diversity principles and is free from unlawful discrimination; and
- A culture of Allyship - "when a person of privilege works in solidarity and partnership with a marginalized group of people to help take down the systems that challenge that group's basic rights, equal access, and ability to thrive in our society". We at Compare Forex Brokers adopt this definition and recognize that as allies we have a degree of power to effect change.

Compare Forex Brokers recognises that all people working in, or visiting our workplaces have the right to be treated with respect and fairness and enjoy an environment free of

discrimination, harassment, bullying and other unlawful behaviour.

## **Equal Employment Opportunity (EEO)**

Compare Forex Brokers is committed to Equal Employment Opportunity (EEO) for all of our team members. This means that our selection, employment and promotion decisions will be based on merit and performance and any unlawful discriminatory practices and behaviours that may exist will be eliminated from our employment processes. This ensures that we treat each other with respect and dignity, that everyone has a fair chance in our workplace to excel and succeed no matter who they are or where they come from.

We promote the principles of merit and fairness in our employment practices. We aim to recruit a diverse range of people with a diverse range of talents to help us achieve our goals.

The Company is committed to achieving the following Equal Employment Opportunity principles:

- to ensure all team members and applicants for employment are treated fairly;
- Diverse interview panel
- Behavioural profiling to remove unconscious bias and match competencies
- A consistent range of questions to create a level playing field
- to facilitate reasonable adjustments in the workplace to enable a person with a disability to have equal employment opportunity and to enable them to perform the requirements of the relevant job;
- to provide flexible work arrangements for balancing the needs of professional and personal life, and promoting the value of diversity and inclusion in the workplace;
- to encourage Aboriginal and Torres Strait Islander employment opportunities based on ability, performance and potential; and
- to keep all policies and procedures consistent with EEO principles.

## **Unlawful Discrimination**

The right to EEO is by law and Compare Forex Brokers shall not tolerate or allow employment decisions or behaviours that reflect unlawful discrimination (direct or indirect) on the basis of:

- Age
- Marital status
- Pregnancy or potential pregnancy
- Breastfeeding
- Race or colour
- Carer status, medical history or religious beliefs
- Irrelevant criminal record

- National or ethnic origin
- Sex
- Gender identity
- Personal association
- Sexual preference
- Disability or impairment (physical/intellectual)
- Physical features
- Sexual orientation
- Political beliefs
- Lawful sexual activity
- Intersex status
- Experience of family and domestic violence
- And any other characteristic that does not relate to an individual's ability to perform the requirements of the role.

## **Harassment**

As well as promoting EEO, Compare Forex Brokers is determined to treat everyone fairly and equitably in an environment free of intimidation and any form of harassment.

Basically, harassment in our workplace will not be tolerated. Harassment by definition is unwelcome conduct (verbal, written and/or electronic communication and social media) of any kind that has the effect of humiliating, intimidating, or offending another person. Both men and women can experience harassment, and this also includes sexual harassment.

Sexual harassment is defined as unsolicited comments (verbal, written & electronic communication) and conduct, including jokes or remarks, posters, screensavers, offensive looks, gestures, or physical contact of a sexual nature that is unwelcome. Please think carefully about your interactions, so that in a situation where a reasonable person, having regard to all the circumstances, could have anticipated that the person harassed would be offended, humiliated, or intimidated, you do not do so.

Some forms of harassment such as stalking, abuse, and assault may also be deemed criminal acts and could be subject to police proceedings and/or civil action.

## **Verbal Harassment**

Verbal harassment will not be tolerated at Compare Forex Brokers; examples of verbal harassment can include but are not limited to:

- Questions, speculation, remarks, or rumours about a person's private life.
- Comments about a person's appearance.

- Imitating someone's accent.
- Insults, name-calling, bullying, taunting, or making fun of someone.
- Statements of a sexual nature.
- Offensive comments or jokes.
- Using language that is inappropriate for the workplace.
- Obscene or nuisance telephone calls or messages.
- Sexual propositions or requests for sex, which may include using a position of authority or power in order to obtain sexual favours.

## **Non-Verbal Harassment**

Non-verbal harassment will not be tolerated, some examples of non-verbal harassment include but are not limited to:

- Sexually related material such as posters, calendars, screensavers, and internet sites (These are banned from display at our premises- if it's inappropriate then don't bring it to work).
- Whistling, gestures, and suggestive looks.
- Statements in writing, however, distributed (including electronically) that are offensive, including via internal mail/e-mail.
- Unwelcome practical jokes.
- Mimicking someone because of a disability or another individual's characteristics.
- Sexual Harassment
- Sexual harassment will not be tolerated at Compare Forex Brokers. Examples of sexual harassment include but are not limited to:
  - Invading someone's personal space, ranging from standing too close, or unnecessarily leaning over someone to stalking, either online or in reality.
  - Unnecessary physical contact (patting, touching, hugging, kissing).
  - Indecent exposure.
  - Physical abuse or assault.
  - Sexual assault.

## **Bullying in the Workplace**

Compare Forex Brokers will not tolerate any form of bullying in our workplace.

Workplace bullying is when a person or group of people repeatedly behave unreasonably towards another worker or group of workers and that behaviour creates a risk to health and safety. It includes behaviour that intimidates, offends, degrades, undermines, or humiliates.

You must think about your conduct and ensure you behave appropriately in our workplace, treating others respectfully. Just be nice.

Bullying behaviour may be overt and obvious, such as repeated:

- Abusive and inappropriate language such as swearing.
- Yelling and screaming.
- Unexplained rages.
- Unjustified persistent criticism.
- Constant humiliation.
- Threats.
- Persistent teasing or horseplay.
- Spreading rumours.
- Initiation 'pranks' on apprentices or new team members. Welcome them instead!

Sometimes bullying behaviour may be covert or less obvious, such as repeatedly:

- Sabotaging work or withholding information or resources.
- Constantly changing targets.
- Work overloading.
- Assigning meaningless tasks which are irrelevant to the position.
- Excluding or isolating someone.

## **Victimisation**

Victimisation among management and staff is unlawful and Compare Forex Brokers treats all complaints of victimisation seriously. Victimisation is when a person treats another unfairly due to them having raised a concern or complain (e.g. Sexual harassment, bullying, discrimination etc). This may include any unfavourable treatment such as adverse changes to work environment, denial of training or promotions amongst other things.

## **Always looking to improve**

Compare Forex Brokers has a right to lawfully direct and control how our work is undertaken, feedback on work performance or behaviour differs from 'bullying' in that feedback or counselling has the aim of improving an individual's standard of work performance and/or behaviour. Division Heads and managers have the responsibility of monitoring workflow and giving their teams appropriate and constructive feedback. Please listen to their suggestions, they are meant to help you be better at your job, nothing else.

## **Zero tolerance**

Discriminatory behaviour or harassment (as detailed above) will not be tolerated at Compare Forex Brokers, and management reserves the right to terminate employment (as a result of a full and thorough investigation) should such a situation arise.

# Resolving Problems

## Compare Forex Brokers Initiated Action – Because We Care

As an employer, it is our duty of care to provide our teams with a workplace that is free from bullying or harassment and in some circumstances, there does not need to be a formal complaint for us to act.

### Making a Complaint

Our people are expected and supported to report any incident in relation to bullying, discrimination, and harassment, or voice any concerns they may have in the workplace.

There are a range of options for dealing with these potential events that allow Employees to raise an issue or complaint with any of our staff.

This policy contains information about responding to a complaint that an Employee may have in relation to their employment.

The objective is to allow grievances and complaints to be addressed and resolved as quickly, justly, fairly and as informally as possible or where necessary and appropriate, and then escalate to the next management level until they are resolved.

### Guidelines

The following general principles apply to the resolution of complaints:

- Everyone has the right to be treated with respect;
- Grievances and complaints will be treated confidentially;
- Wherever appropriate, a non-adversarial and non-judgmental resolution to the problem will be pursued; and
- Investigations will be conducted fairly and justly.

In addition, the person against whom the allegation is made has the right to know what is alleged against them and the right to state their case in reply.

### I have a problem at work, what can I do about it?

If you have a complaint about someone else, and you feel comfortable doing so, your first response should be to tell the person that you find their behaviour to be inappropriate, unwelcome and/ or offensive and politely ask them to stop.

If it reoccurs, or you are uncomfortable asking the person to stop, you should report it to your Division Head or manager. At that stage, your complaint may be treated as informal or formal, and this is your choice.

In some circumstances, we may be obliged to investigate your complaint or initiate an investigation even where no complaint is made.

### **Informal Complaints and ways to deal with them:**

Informal methods of dealing with grievances may include the following actions:

You may want to deal with the situation yourself but may also seek advice on possible strategies from your Division Head or manager.

Where appropriate, your Division Head or manager may arrange a meeting so you can discuss your grievance with the other person involved, with the Division Head or manager or with another person acting as a mediator.

You may ask your Division Head or manager to speak with someone on your behalf about inappropriate behaviour. In this case, the Division Head or manager will privately convey your concerns and reiterate Compare Forex Brokers's Diversity, Anti-Discrimination and EEO policy (as appropriate), without forming a view about whether the behaviour or conduct has occurred.

If the person about whom your complaint is made admits to inappropriate workplace behaviour or other misconduct, the complaint may be resolved through conciliation or counselling.

### **Formal Complaints and the process.**

The formal complaints process should be used in situations where informal resolution of the complaint hasn't worked, or is inappropriate, or where the complainant has initiated the formal complaints process.

A formal complaint must be made in writing to your Division Head or manager.

Division Head or manager will then pass the complaint onto the person who has been appointed to conduct an investigation.

The appointed Division Head or manager will investigate the grievance or complaint and will then submit a confidential written report to the CEO who may carry out further investigations if necessary, including referring the matter to an external investigator, mediator or conciliator.

If the investigation leads to a conclusion that a team member has engaged in inappropriate workplace behaviour or other misconduct, the CEO will take appropriate action.

All parties to the complaint will be advised of the outcome.

Disciplinary action will depend on the circumstances of the case, but may include the

following:

- Verbal warning and counselling;
- Written warning; and/or
- Dismissal.

### **Non-Victimisation of others**

Compare Forex Brokers will not disadvantage anyone for bringing a truthful and legitimate grievance forward. However, bringing an intentionally false grievance or complaint actually constitutes misconduct and may lead to disciplinary action.

### **Flexibility**

Despite what is set out in this Policy, Compare Forex Brokers may choose to deal with a grievance or complaint in a different way, if Compare Forex Brokers considers it appropriate.

### **Confidentiality**

Maintaining confidentiality is a crucial part of this process, however, when a full and thorough investigation of any complaint occurs, the identity of both parties may be communicated to individuals who are interviewed or who are involved in making decisions around the outcome.

In situations such as Workers Compensation, OH&S, Performance Management, Diversity issues and investigations, the only people who may access such information are CEO. It is a breach of this Policy for anyone outside to access this information without permission of the CEO. If you are asked a question about someone's private information and are unsure about whether to provide it, please check with the CEO.

All parties involved in the investigation of a complaint must not divulge any confidential information and will be required to sign a confidentiality agreement. Appropriate disciplinary action will be taken if this agreement is breached.

# Workplace Health and Safety

Compare Forex Brokers will provide a safe work environment for the health, safety and welfare of our team members, contractors, visitors and clients.

Our aim is to:

- have zero illnesses, injuries and fatalities occur within its offices or as a result of its activities;
- continuously and vigilantly identify, learn from, eliminate or minimise exposure to hazards in the workplace as far as is reasonably practicable; and
- improve its prospects for being an employer of choice based on the Company's reputation for promoting mentally healthy and safe work practices, and respect for its people.

Ultimately, everyone at the workplace is responsible for ensuring health and safety at our workplace. It's a team effort to keep everyone safe!

All Employees are accountable for:

- Acting in accordance with any health and safety directives given by the company
- Identifying practices and conditions that could injure our teams, clients, members of the public or the environment
- Act in a way that continuously promotes person health, safety and wellbeing and that of others
- Controlling such situations or removing the risk to safety. If they are unable to control such practices and conditions, report these to their Division Head or manager.

Compare Forex Brokers requires a positive, proactive attitude with respect to protecting health, safety and the environment by all team members, irrespective of their position in the company.

Please note that all injuries, near misses and incidents are to be reported to your Division Head or manager as soon as practicable. All incidents will then be appropriately assessed.

## Fire evacuation and first Aid

In the event of a fire evacuation or test evacuation all staff should follow the instructions of the fire warden. The exits will be the fire stair wells.

## **Psychosocial hazards**

A psychosocial hazard is anything that could cause psychological harm (harm someone's mental health). Mental health is of utmost importance to us all at Compare Forex Brokers and we are proud signatories of our industries mental health standard below.

Compare Forex Brokers is committed to providing all employees with a mentally healthy workplace.

## **Mental Health First Aid practitioners**

We invest in mental health first aid training with MHFA (Mental Health First Aid Australia). This means we know how to have safe and confident conversations to support mental wellbeing at work and home.

## [Minimum Standards — Mentally Healthy \(mentally-healthy.org\)](https://mentally-healthy.org)

We don't expect our people to be connected to work when on annual, sick or carers leave, this includes sending or responding to emails and taking calls. When on leave, you should be having a break and truly disconnecting from work. If you do have critical matters to respond to or be involved in, be disciplined about only engaging in what is necessary.

We support people who disclose mental health issues and commit to not victimising them, discriminating against them or making them feel less for it.

We support people who disclose mental health issues and understand where to direct people to benefit from more help.

We provide clarity on priorities and goals so that our people understand how they contribute to the organisation's success and progress in their role.

Our industry can be unpredictable at times. We may ask our people to work on weekends for exceptional projects / pitches. However, we don't expect our people to do so consistently and will offer time in lieu should this happen. The same goes for significant and continued overtime.

We commit to providing workplaces that are psychologically safe and supportive of individual differences.

We commit to ongoing discussions about mental wellness to ensure that it is a normal part of our everyday.

We commit to protecting our people's privacy if they disclose a mental health condition and to respect an appropriate level of confidentiality.

If our people disclose a mental health concern at work, we commit to providing reasonable adjustments to their role or working environment to make allowances for their mental health condition.

We have zero tolerance for people who do not abide by these standards.

*Sign the Minimum Standards and find out how to create a mentally healthier business at [mentally-healthy.org](https://mentally-healthy.org)*

**Mentally-  
Healthy**  
Minimum Standards

# Working From Home

Our Hybrid work approach is based on you the employee working either

- in the office of or
- from your home.

## Working from home workspace set up and expectations

When working from home, you are required to perform and participate at the same standard as in the office and are responsible for achieving the required work outputs and effectively managing your time.

When working from home, you are expected to be available during normal working hours to make and receive phone calls and or attend meetings as required.

You are expected to work your ordinary hours or unless flexibility has been otherwise agreed

Our managers are responsible for effectively managing the team while working remotely.

This may include:

- ensuring employees WFH are included in onsite activities by other means where appropriate and/or possible (e.g. teams);
- maintaining regular contact; and
- setting and documenting performance expectations.

When working from home you are responsible for your own health and safety. You must ensure that work is conducted in a safe manner free from risk or harm to yourself or others. It is important to report any hazards or incidents to your manager.

Working from home arrangements may not be used as a substitute for childcare, dependent care or to perform household responsibilities.

# IT Data and Security

Nunn Media recognizes the importance of cyber security in safeguarding sensitive information, maintaining operational continuity, and protecting the trust of our clients, partners, and stakeholders. This policy outlines our commitment to establishing and maintaining effective cyber security practices across all aspects of our operations.

## Objectives

The objectives of this cyber security policy are:

- Protecting the confidentiality, integrity, and availability of all information assets.
- Minimizing the risk of cyber threats and vulnerabilities through proactive measures.
- Ensuring compliance with relevant laws and industry standards.
- Promoting a culture of cyber security awareness and accountability among all employees.

## Roles and Responsibilities

Management Responsibilities:

- Providing leadership and oversight of cyber security initiatives.
- Allocating resources necessary for the implementation of cyber security measures.
- Ensuring continuous improvement of cyber security policies and practices.

## Employee Responsibilities:

- Following all cyber security policies and procedures.
- Reporting any suspected security incidents or vulnerabilities promptly.
- Participating in cyber security training and awareness programs.

## Incident Reporting:

If you experience any data or security concerns or receive a suspicious email, please immediately notify Peter Dimakidis (CTO) and Think Solutions. Please do not click on any links or reply – emails should be forwarded to Think Solutions.

## Email access

Your Compare Forex Brokers work email is not for personal or private use and your work emails may be reviewed at any time by senior management. If you are away on leave, please set up the Out of Office automatic reply in your Outlook Settings. If you are travelling overseas – you require written approval, to be granted any access to work emails. Please

seek approval from the General Manager. Based on risk they may decline your request for access. If approval is granted, Think Solutions will need to be advised of timings and requirements. If you are going on leave, we recommend you use the time to disconnect from work and not be interrupted by emails.

If you receive an email that is not meant for you, you should let the person know who sent it and attempt not to read the contents of this. You must not send, access or attempt access to another's emails without authority from them first.

### **Computer access**

Compare Forex Brokers reserves the right to block internet or email access if the content contains material of an offensive or otherwise unacceptable nature.

Employees are prohibited from downloading, transmitting, viewing or storing material of an offensive nature which may disrupt the workplace, give offence to any individual, or place Compare Forex Brokers at the risk of civil and/or criminal prosecution, embarrassment or loss of reputation. Such materials include, but are not limited to, material that:

- is offensive, obscene, inappropriate; or sexually explicit;
- could cause offence, humiliation, intimidation or insult to another person;
- is promoting discrimination on grounds including race, religion, national origin, sex or disability; supports violent or criminal acts;
- contains sexual, political or theological references or jokes;

To ensure, optimal protection of the Compare Forex Brokers network, all employees need to login and logout of their computers at the start and end of each work day.

Compare Forex Brokers may carry out ongoing and/or intermittent monitoring of employees and their use of their computers and other IT infrastructure, including emails, internet, voice mail, telephone calls, data usage, files (including files stored on employees' work computers) and records obtained from any such systems or infrastructure. Any data, files, or software which is of concern and may compromise Compare Forex Brokers's data and security protocols maybe be destroyed, stored or archived in accordance with applicable laws.

When an employee departs Compare Forex Brokers, they need to return all hardware (laptop, screens, devices etc), access to files and work email on your mobile device need to be deleted. Your final pay will be approved upon receipt of Compare Forex Brokers devices and confirmation that mobile-related access has been turned off.

### **Social Media**

Compare Forex Brokers has an active presence on social media platforms which is updated regularly to share achievements, social events etc of the agency. When participating within

the social media community on a personal basis and as a Compare Forex Brokers employee,

staff must adhere to these guidelines to protect stakeholders:

Ensure personal comments do not bring Compare Forex Brokers or any of its stakeholders into disrepute.

Do not criticise Compare Forex Brokers, or its stakeholders when making social media posts. Or imply any personal comments are endorsed in any way by Compare Forex Brokers.

Do not disclose confidential information obtained through employment with Compare Forex Brokers.

Do not participate in social media networks in such a way that harasses, defames, discriminates or treats unfairly or inappropriately any stakeholder of Compare Forex Brokers.

Do not speak or post images on behalf of, or related to Compare Forex Brokers without the express prior approval by Compare Forex Brokers senior management.

Failure by a staff member to comply with this policy may result in disciplinary action. We may request that you delete any content posted that is in breach of this policy, including content which you post in your personal capacity. We may also restrict your access to social media sites during work time if you are found to be accessing them unreasonably or excessively.

### **AI Policy**

Compare Forex Brokers recognizes the transformative potential of Artificial Intelligence (AI) in enhancing our media operations, including content creation, audience targeting, and data analysis.

Employees are ultimately responsible for the output of their work using generative AI as such Employees must communicate clearly when and how AI is used in their work, ensuring transparency with managers, teams, clients and partners. This includes any application of AI tools in the course of providing media recommendations, campaign reports or media solutions.

No confidential information, personal information or client data may be inputted into any public AI Tool, noting client contracts may prohibit the use of AI tools and therefore approval from Peter Dimakidis (CTO) is required prior. Compare Forex Brokers or client data must not be inputted into any AI Tool without being sanitised of confidential information. Employees must adhere to data protection regulations and ensure that personal and client data used in AI systems is anonymized and securely stored.

You must be extremely careful to ensure that you do not inadvertently disclose confidential information.

Most AI Tools technologies are hosted in the cloud, however if you are prompted to

download software to use AI Tools, you must submit a request to the Think Solutions Help Desk to do so.

You must clearly disclose to your manager that AI Tools have been used in the creation of any products, services or materials. Clients and other client stakeholders must be informed of any use of AI Tools used in the course of providing media services to them as required by client agreements.

You must verify the accuracy of the material generated by AI Tools, and you must not present any materials generated by AI Tools without doing so. The outputs of AI Tools may not be based on reliable sources and may produce biased or incorrect content. Output created using AI Tools may contain third-party IP.

You must be aware of the limitations of any AI Tools. For example, the GPT3.5 model was trained on data available on the internet up until November 2021.

### Prohibited Uses

The use of AI Tools such as Generative AI poses risks related to:

- data privacy and confidentiality
- bias
- ethics
- breach of client expectations
- currency of information
- intellectual property rights.

If you use AI Tools in breach of this policy, you may be subject to disciplinary action.

Employees are accountable for the ethical use of AI systems. Regular reviews and audits must be conducted to ensure compliance with this policy. Employees must ensure that AI applications promote fairness and inclusivity and adhere to the Compare Forex Brokers diversity and inclusion policy.

AI systems should support, not replace, human decision-making. Critical decisions must always involve human oversight to ensure accuracy and ethical considerations.

### **Data & Security Training:**

All Compare Forex Brokers Employees need to complete annual privacy training to ensure good privacy and security practice. Additionally, all Compare Forex Brokers Employees are to complete compliance training video modules scheduled throughout the year to ensure all employees understand do's and don'ts for data and security compliance.

# Privacy and Confidentiality

The word 'privacy' means different things to different people. The type of privacy referred to here refers to privacy of personal information. This policy aims to provide guidelines surrounding privacy of information and the way that confidentiality is managed and protected.

## Your personal details

Personal information is any data that identifies someone or could identify someone, such as name, or address, but can also include medical records, bank account details, photos, videos, and even information about what a person likes, their opinions or where they work – basically, any information in which a person could be reasonably identifiable.

Information doesn't need to include a person's name to be personal information. For example, in some cases, a date of birth and postcode may be enough to identify someone.

The Information Privacy Act 2000 definition of personal information is:

**"...Information or an opinion, whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion."**

## Confidentiality

The definition of confidentiality at Compare Forex Brokers is the expectation that personal information of our team remains in confidence and that privacy is respected.

## Information Storage and Use

We are committed to the privacy and confidentiality of information in everything that we do including:

- Recruitment and Selection;
- Performance Management;
- Bullying, Discrimination and Harassment;
- Diversity and EEO issues;
- Occupational Health and Safety including Workers Compensation; and
- Payroll.

The Information Privacy Act compels us as a Company to make sure that the personal information of our teams and potential team members, is used only for the purpose that it was collected, is not disseminated to individuals who are not authorised to obtain this

information, and that security is maintained at all times.

Management holds all personal information relating to our people in personnel files that are secure. Team member information will not be kept in any other area as this pose's privacy breach risks. Any information relating to individuals should be sent to Management and requested from them as needed.

In situations such as Recruitment and Selection, Workers Compensation, OH&S, Performance Management, Diversity issues and investigations, the only people who may access such information are the Management Team. It is a breach of this Policy for anyone outside to access this information without permission of the CEO. All team members are asked to carefully consider whom they communicate information to.

If you are asked a question about someone's private information and are unsure about whether to provide it, please check with your manager.

### **Policy Breaches**

Compare Forex Brokers treats this Policy as serious, and any breaches will be managed accordingly, up to and including dismissal.

# Compare Forex Brokers - Declaration

Please read all the policies and processes contained in this document and listed below! Company policies and processes are a part of your employment contract and must be understood to make sure you are fully aware of your responsibilities as an Compare Forex Brokers team member. Please read and tick off each of these sections to indicate you are aware of the rules and responsibilities you have whilst employed here.

- |  |                          |
|--|--------------------------|
| Leave Policy                                     | <input type="checkbox"/> |
| Flexible Work at Nunn Media Policy               | <input type="checkbox"/> |
| Alcohol, Drugs, Smoking or Vaping at Work Policy | <input type="checkbox"/> |
| Code of Conduct Policy                           | <input type="checkbox"/> |
| Professional Appearance Policy                   | <input type="checkbox"/> |
| Anti-Bribery and Anti-Corruption Policy          | <input type="checkbox"/> |
| Conflict of Interest Policy                      | <input type="checkbox"/> |
| Diversity, Anti-Discrimination and EEO Policy    | <input type="checkbox"/> |
| Resolving Problems Policy                        | <input type="checkbox"/> |
| Workplace Health & Safety                        | <input type="checkbox"/> |
| Working From Home Policy                         | <input type="checkbox"/> |
| IT Data and Security                             | <input type="checkbox"/> |
| Privacy and Confidentiality Policy               | <input type="checkbox"/> |

## Declaration:

I have read and understand the contents of this handbook along with the above policies and I agree to the terms of conditions of these documents.

Name:	
Signature:	

Date Signed: