

CODE OF CONDUCT

Policy

Fernwood Women's Health Clubs' Code of Conduct sets ethical standards for all employees to enforce and advocate. This ethical framework delivers an environment in which our staff can excel regardless of race, religion, age, disability or gender, and within the structure of our unique company values.

The following principles govern Fernwood Women's Health Clubs' employee conduct wherever Fernwood Women's Health Club operates:

1. Honesty and Integrity

I will not make statements, promises or commitments that I do not believe or which I or Fernwood Women's Health Clubs do not intend or are unable to honour:

- My conduct will be such that my honesty is beyond question.
- In all communications, I will adhere to the truth and will not knowingly make statements nor mislead directly, indirectly or by omission.
- I will at all times deal fairly and in good faith with Fernwood Women's Health Clubs' customers, suppliers and competitors as well as with work colleagues and other parties.
- I will treat all people with respect and will undertake my duties with care and diligence and uphold Fernwood Women's Health Clubs' values.
- I will protect Fernwood Women's Health Clubs' reputation and assets.
- In all dealings with colleagues, members and suppliers I will always interact in a direct, positive and motivated manner.

2. Personal transactions and gain

My personal dealings will be kept separate from my business dealings.

- I will not use the name of Fernwood Women's Health Clubs nor any information obtained in the course of my employment or as a result of my position with Fernwood Women's Health Clubs to further any transaction or gain.
- I will use goods, services and facilities provided to me by Fernwood Women's Health Clubs strictly in accordance with the terms on which they are provided and will ensure that such goods and facilities are properly protected.

3. Confidentiality of Information

I will respect the privacy of others

- I will ensure that confidential information relating to customers, work colleagues, suppliers and Fernwood Women's Health Clubs operations is properly protected and not disclosed to third parties, unless allowed or required under relevant law.
- I will not use information obtained in the course of my employment or as a result of my position with Fernwood Women's Health Clubs for financial gain, nor allow that information to be used to obtain financial benefit for any other person or company.

4. Conflict of Interest

My primary business loyalty is to Fernwood Women's Health Clubs.

- I will immediately and fully disclose to my supervisor or line manager any personal matters that may lead to actual or perceived conflicts of interest.
- My dealings with customers, suppliers and other parties will always be at arm's length to avoid the possibility of actual or perceived conflicts of interest

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5. Abiding by the Law

I will abide by the law and this Code.

- I will not take any action, nor allow any omission that will breach any law or regulation.
- I will immediately report knowledge of any actual or potential breaches of this code to my supervisor, line manager or business unit so that appropriate action can be taken.
- I understand that breaches of any provision of this Code will be investigated and could result in disciplinary action including termination of employment with Fernwood Women's Health Clubs. I will comply with all statutory and internal disclosure requirements on a timely basis and if applicable to me, will ensure the full, fair, accurate and understandable disclosure of matters in financial reports.

6. Payments, gifts or entertainment

I will not accept or provide any gift or entertainment in breach of this Code.

- I will not use my employment status or position at Fernwood Women's Health Clubs to seek personal gain from those doing business or seeking to do business with Fernwood Women's Health Clubs or from any other person or company.
- I will not accept any cash payments but may accept gifts if the market value of this gift is less than \$200 (or equivalent) provided such gifts are not given in return for any consideration and such gift is placed in a staff pool.
- I will not accept or provide any entertainment that could reasonably be seen to be abnormal or excessive.
- I will not offer, promise or provide a bribe, in any form, to any person, either directly or indirectly and I will not accept a bribe from any person.

7. Company Image

I will present a professional and positive company image to colleagues, members and suppliers at all times.

- As a club staff member, I will wear the Fernwood Uniform with pride – neat, clean and ironed.
- As a Support Office staff member, I will wear smart casual attire acceptable within corporate environment (i.e.: no tank tops, no see-through garments, reasonable necklines, no torn jeans, no tracksuits). Or I will wear the Fernwood uniform with pride – neat, clean and ironed
- I will present a groomed, neat appearance with minimal jewellery and make up.
- I understand that visible body piercings (except for earrings) and visible tattoos are not acceptable in presenting professional, company image
- I will not wear any unsafe item of apparel e.g. loose footwear such as thongs or platform shoes.
- I will not smoke whilst wearing the Fernwood Uniform or when recognizable as a Fernwood employee, when interacting with colleagues, members, franchisees or suppliers in a Fernwood Women's Health Club, the office or in the field.