

# Canberra Services Club

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## GOV-001 Board Conflict of Interest and Material Personal Interest Policy

|                       |                             |
|-----------------------|-----------------------------|
| Policy Number         | GOV-001                     |
| Version               | Ver.01.2026                 |
| Drafted By            | Director Governance & Audit |
| Approved By           | Board                       |
| Approval Date         | [Insert]                    |
| Responsible Officer   | President                   |
| Scheduled Review Date | Three Years from Approval   |

### Introduction

The Canberra Services Club Ltd is committed to the highest standards of governance, integrity, transparency and accountability. This Policy establishes mandatory governance requirements relating to conflicts of interest and material personal interests.

### Purpose

To ensure all conflicts of interest are identified, disclosed and appropriately managed and to establish clear disciplinary consequences for non-compliance.

### Scope

This Policy applies to Directors, Officeholders, Board committee members, senior management personnel and any person participating in governance decision-making.

### Policy Statement

All persons subject to this Policy must act honestly, in good faith and in the best interests of the Company at all times.

### Mandatory Disclosure Requirements

All actual, potential and perceived conflicts of interest must be disclosed immediately upon becoming aware of the conflict.

### Management of Conflicts

A conflicted individual must not participate in discussions, deliberations or voting relating to the conflicted matter.

### Registers and Documentation

The Company must maintain a Conflict of Interest Register and all disclosures must be formally recorded in Board minutes.

## **Non-Compliance**

Breaches of this Policy constitute serious governance misconduct and may result in Board censure, removal from committees, suspension, referral to regulators, termination of appointment or other disciplinary action permitted by law.

## **Responsibilities**

The Board is responsible for governance oversight and enforcement of this Policy.

## **Related Documents**

Constitution, Board Charter, Director Code of Conduct, Whistleblower Policy, Fraud and Corruption Control Policy and Operational Rules Handbook.

## **Review**

This Policy must be reviewed every three years or earlier if required by the Board.

# Canberra Services Club

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## GOV-002 Board Charter

|                       |                             |
|-----------------------|-----------------------------|
| Policy Number         | GOV-002                     |
| Version               | Ver.01.2026                 |
| Drafted By            | Director Governance & Audit |
| Approved By           | Board                       |
| Approval Date         | [Insert]                    |
| Responsible Officer   | President                   |
| Scheduled Review Date | Three Years from Approval   |

### Introduction

This Board Charter establishes the governance framework, responsibilities, authority and operational expectations of the Board of Canberra Services Club Ltd.

### Purpose

To provide clear governance direction, define Board responsibilities and establish accountability, transparency and ethical governance standards.

### Role of the Board

The Board is responsible for governance oversight, strategic direction, compliance, financial stewardship, risk management and protection of the long-term interests of the Company.

### Board Responsibilities

The Board is responsible for governance strategy, financial oversight, risk management, regulatory compliance, appointment and oversight of the General Manager, policy approval and organisational integrity.

### Director Duties

Directors must act in good faith, in the best interests of the Company, for proper purposes and with reasonable care and diligence at all times.

### Board Meetings

Board meetings are to be conducted in accordance with the Constitution, governance policies and applicable legislation.

### Conflict of Interest

Directors must disclose actual, potential and perceived conflicts of interest in accordance with the Conflict of Interest Policy and the Constitution.

## **Confidentiality**

Directors must maintain confidentiality regarding all non-public Board information both during and after their term of office.

## **Delegations**

The Board may delegate operational authority to the General Manager or committees while retaining ultimate governance responsibility.

## **Non-Compliance**

Breaches of this Charter may result in Board censure, removal from committees, governance sanctions, referral for legal review or other disciplinary action permitted by law.

## **Related Documents**

Constitution, Governance Framework, Conflict of Interest Policy, Code of Conduct, Delegations Policy and Operational Rules Handbook.

## **Review**

This Charter must be reviewed every three years or earlier if required by the Board.

# Canberra Services Club

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## GOV-004 Delegations of Authority Policy

|                       |                             |
|-----------------------|-----------------------------|
| Policy Number         | GOV-004                     |
| Version               | Ver.01.2026                 |
| Drafted By            | Director Governance & Audit |
| Approved By           | Board                       |
| Approval Date         | [Insert]                    |
| Responsible Officer   | President                   |
| Scheduled Review Date | Three Years from Approval   |

### Purpose

To establish a clear framework for delegation of authority, accountability and operational decision-making.

### Policy Statement

The Board retains ultimate governance responsibility while delegating operational authority appropriately.

### Delegation Principles

All delegations must be lawful, documented, accountable and subject to oversight.

### Financial Delegations

Financial approvals must comply with approved limits and procurement controls.

### Non-Compliance

Unauthorised decision-making or misuse of delegated authority may result in disciplinary action.

# Canberra Services Club

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## GOV-005 Governance Framework Policy

|                       |                             |
|-----------------------|-----------------------------|
| Policy Number         | GOV-005                     |
| Version               | Ver.01.2026                 |
| Drafted By            | Director Governance & Audit |
| Approved By           | Board                       |
| Approval Date         | [Insert]                    |
| Responsible Officer   | President                   |
| Scheduled Review Date | Three Years from Approval   |

### Purpose

To establish the governance framework and hierarchy for Canberra Services Club Ltd.

### Governance Structure

The governance hierarchy consists of Members, Constitution, Board, Operational Rules and Management Procedures.

### Board Governance

The Board is responsible for governance oversight, accountability and strategic direction.

### Compliance Obligations

The Company must comply with all applicable Commonwealth and ACT legislation.

### Non-Compliance

Governance breaches may result in disciplinary action or regulatory referral.

# Canberra Services Club

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## GOV-006 Risk Management Policy

|                       |                             |
|-----------------------|-----------------------------|
| Policy Number         | GOV-006                     |
| Version               | Ver.01.2026                 |
| Drafted By            | Director Governance & Audit |
| Approved By           | Board                       |
| Approval Date         | [Insert]                    |
| Responsible Officer   | President                   |
| Scheduled Review Date | Three Years from Approval   |

### Purpose

To establish a structured approach to risk identification, assessment, mitigation and monitoring.

### Risk Framework

The Company will maintain strategic, operational, financial and compliance risk registers.

### Responsibilities

The Board oversees risk management while management implements operational controls.

### Incident Reporting

All significant incidents and emerging risks must be reported promptly.

### Non-Compliance

Failure to comply with risk controls may result in disciplinary action.

# Canberra Services Club

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## GOV-007 Fraud and Corruption Control Policy

|                       |                             |
|-----------------------|-----------------------------|
| Policy Number         | GOV-007                     |
| Version               | Ver.01.2026                 |
| Drafted By            | Director Governance & Audit |
| Approved By           | Board                       |
| Approval Date         | [Insert]                    |
| Responsible Officer   | President                   |
| Scheduled Review Date | Three Years from Approval   |

### Purpose

To prevent, detect and respond to fraud, corruption and dishonest conduct.

### Zero Tolerance

The Company adopts zero tolerance toward fraud, corruption, theft and dishonest conduct.

### Reporting Obligations

Suspected fraud or corruption must be immediately reported.

### Investigations

The Company may refer matters to auditors, investigators or law enforcement agencies.

### Non-Compliance

Fraud or corruption may result in dismissal, regulatory action or criminal referral.

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## GOV-008 Whistleblower Policy

|                       |                             |
|-----------------------|-----------------------------|
| Policy Number         | GOV-008                     |
| Version               | Ver.01.2026                 |
| Drafted By            | Director Governance & Audit |
| Approved By           | Board                       |
| Approval Date         | [Insert]                    |
| Responsible Officer   | President                   |
| Scheduled Review Date | Three Years from Approval   |

### Purpose

To encourage reporting of misconduct and protect whistleblowers from retaliation.

### Protected Disclosures

Eligible disclosures may include fraud, corruption, misconduct or legal breaches.

### Confidentiality

Whistleblower identities and reports must be handled confidentially.

### Victimisation

Retaliation against whistleblowers is prohibited.

### Non-Compliance

Victimisation or interference with whistleblower protections may result in disciplinary action.

# Canberra Services Club

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## GOV-009 Board Officeholder Policy

|                       |                             |
|-----------------------|-----------------------------|
| Policy Number         | GOV-009                     |
| Version               | Ver.01.2026                 |
| Drafted By            | Director Governance & Audit |
| Approved By           | Board                       |
| Approval Date         | [Insert]                    |
| Responsible Officer   | President                   |
| Scheduled Review Date | Three Years from Approval   |

### Purpose

To define the roles, responsibilities and governance expectations of Board Officeholders.

### Officeholder Positions

Officeholders may include the President, Vice President, Director Finance and Risk and Director Governance and Audit.

### Responsibilities

Officeholders must exercise leadership, integrity, accountability and governance oversight.

### Succession and Vacancies

The Board may appoint replacement Officeholders where vacancies arise.

### Non-Compliance

Failure to comply with governance obligations may result in removal from Officeholder positions.

# Canberra Services Club

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## GOV-010 Director Confidentiality Policy

|                       |                             |
|-----------------------|-----------------------------|
| Policy Number         | GOV-010                     |
| Version               | Ver.01.2026                 |
| Drafted By            | Director Governance & Audit |
| Approved By           | Board                       |
| Approval Date         | [Insert]                    |
| Responsible Officer   | President                   |
| Scheduled Review Date | Three Years from Approval   |

### Purpose

To protect confidential governance, operational, commercial and personal information.

### Confidential Information

Directors must not improperly disclose or use confidential information.

### Information Security

Board papers and sensitive information must be securely stored and protected.

### Post-Term Obligations

Confidentiality obligations continue after a Director ceases office.

### Non-Compliance

Unauthorised disclosure may result in disciplinary action or legal proceedings.

# Canberra Services Club

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## COM-001 Gaming Compliance Policy

|                       |                             |
|-----------------------|-----------------------------|
| Policy Number         | COM-001                     |
| Version               | Ver.01.2026                 |
| Drafted By            | Director Governance & Audit |
| Approved By           | Board                       |
| Approval Date         | [Insert]                    |
| Responsible Officer   | President                   |
| Scheduled Review Date | Three Years from Approval   |

### Purpose

To ensure lawful and compliant gaming operations under ACT legislation.

### Regulatory Compliance

The Company must comply with the Gaming Machine Act 2004 (ACT) and all licence conditions.

### Harm Minimisation

The Company is committed to responsible gambling and harm minimisation practices.

### Training Requirements

Relevant personnel must complete mandatory gaming compliance training.

### Non-Compliance

Gaming compliance breaches may result in disciplinary action, regulator notification or licence consequences.

# Canberra Services Club

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## COM-002 RSA and Liquor Compliance Policy

|                       |                             |
|-----------------------|-----------------------------|
| Policy Number         | COM-002                     |
| Version               | Ver.01.2026                 |
| Drafted By            | Director Governance & Audit |
| Approved By           | Board                       |
| Approval Date         | [Insert]                    |
| Responsible Officer   | President                   |
| Scheduled Review Date | Three Years from Approval   |

### Purpose

To ensure responsible service of alcohol and compliance with liquor licensing obligations.

### Responsible Service

Alcohol must only be supplied lawfully and responsibly.

### Intoxication Management

Service must be refused to intoxicated persons in accordance with the Liquor Act 2010 (ACT).

### Training Requirements

Relevant personnel must hold current RSA qualifications.

### Non-Compliance

Breaches may result in disciplinary action, licence sanctions or regulatory referral.

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## COM-003 Privacy and Data Protection Policy

|                       |                             |
|-----------------------|-----------------------------|
| Policy Number         | COM-003                     |
| Version               | Ver.01.2026                 |
| Drafted By            | Director Governance & Audit |
| Approved By           | Board                       |
| Approval Date         | [Insert]                    |
| Responsible Officer   | President                   |
| Scheduled Review Date | Three Years from Approval   |

### Purpose

To protect personal information and ensure compliance with privacy obligations.

### Collection and Use

Personal information must only be collected, used and disclosed lawfully.

### Data Security

The Company must maintain appropriate cyber security and information protection measures.

### Access and Correction

Individuals may request access to or correction of personal information where lawful.

### Non-Compliance

Privacy breaches may result in disciplinary action, reporting obligations or legal consequences.

# Canberra Services Club

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## HR-001 Workplace Behaviour and Conduct Policy

|                       |                             |
|-----------------------|-----------------------------|
| Policy Number         | HR-001                      |
| Version               | Ver.01.2026                 |
| Drafted By            | Director Governance & Audit |
| Approved By           | Board                       |
| Approval Date         | [Insert]                    |
| Responsible Officer   | President                   |
| Scheduled Review Date | Three Years from Approval   |

### Purpose

To promote respectful, professional and lawful workplace conduct.

### Expected Standards

Employees and workers must behave respectfully, ethically and professionally.

### Bullying and Harassment

Bullying, harassment, discrimination and victimisation are prohibited.

### Reporting Misconduct

Workplace misconduct should be reported through appropriate channels.

### Non-Compliance

Misconduct may result in disciplinary action including termination.

# Canberra Services Club

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## HR-002 Equal Employment Opportunity Policy

|                       |                             |
|-----------------------|-----------------------------|
| Policy Number         | HR-002                      |
| Version               | Ver.01.2026                 |
| Drafted By            | Director Governance & Audit |
| Approved By           | Board                       |
| Approval Date         | [Insert]                    |
| Responsible Officer   | President                   |
| Scheduled Review Date | Three Years from Approval   |

### Purpose

To promote equal opportunity and prevent unlawful discrimination.

### Commitment

The Company is committed to fairness, diversity and inclusion.

### Discrimination

Unlawful discrimination and harassment are prohibited.

### Recruitment

Employment decisions must be merit-based and lawful.

### Non-Compliance

Breaches may result in disciplinary action or legal consequences.

# Canberra Services Club

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## OPS-001 Complaints and Dispute Resolution Policy

|                       |                             |
|-----------------------|-----------------------------|
| Policy Number         | OPS-001                     |
| Version               | Ver.01.2026                 |
| Drafted By            | Director Governance & Audit |
| Approved By           | Board                       |
| Approval Date         | [Insert]                    |
| Responsible Officer   | President                   |
| Scheduled Review Date | Three Years from Approval   |

### Purpose

To provide fair, transparent and lawful complaint handling procedures.

### Complaint Management

Complaints must be handled professionally, impartially and confidentially.

### Procedural Fairness

Affected persons must be provided procedural fairness.

### Resolution Processes

The Company may use mediation, investigation or other lawful resolution methods.

### Non-Compliance

Failure to comply with complaint handling obligations may result in disciplinary action.

# Canberra Services Club

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## WHS-001 Work Health and Safety Policy

|                       |                             |
|-----------------------|-----------------------------|
| Policy Number         | WHS-001                     |
| Version               | Ver.01.2026                 |
| Drafted By            | Director Governance & Audit |
| Approved By           | Board                       |
| Approval Date         | [Insert]                    |
| Responsible Officer   | President                   |
| Scheduled Review Date | Three Years from Approval   |

### Purpose

To ensure Canberra Services Club Ltd maintains a safe, lawful and healthy workplace environment.

### Legal Compliance

The Company must comply with the Work Health and Safety Act 2011 (Cth) and applicable ACT legislation.

### Responsibilities

The Board, management, workers and contractors share responsibility for workplace safety.

### Hazard Management

Hazards must be identified, reported, assessed and controlled promptly.

### Non-Compliance

Breaches of WHS obligations may result in disciplinary action or regulatory referral.

# Canberra Services Club

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## WHS-002 Incident Reporting and Investigation Policy

|                       |                             |
|-----------------------|-----------------------------|
| Policy Number         | WHS-002                     |
| Version               | Ver.01.2026                 |
| Drafted By            | Director Governance & Audit |
| Approved By           | Board                       |
| Approval Date         | [Insert]                    |
| Responsible Officer   | President                   |
| Scheduled Review Date | Three Years from Approval   |

### Purpose

To establish procedures for reporting, recording and investigating incidents and near misses.

### Incident Reporting

All incidents, injuries and hazards must be reported immediately.

### Investigations

Incidents must be investigated to identify root causes and corrective actions.

### Regulator Notifications

Notifiable incidents must be reported to regulators where required by law.

### Non-Compliance

Failure to report incidents may result in disciplinary action.