



CODE OF CONDUCT

SUMMARY

This Code reflects the values of Mighty Kingdom and the expected behaviours of the Mighty Kingdom team.



AUTHORISATION

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AMENDMENT HISTORY

VERSION	AMMENDMENT	COMMENCING
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1.1	Formatting adjustment to bring in line with other policies	3 January 2019
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2.1	Formatting to bring in line with other policies, updated links	9 December 2021



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About this Code

This Code reflects the values of Mighty Kingdom and the expected behaviours of the Mighty Kingdom team.

We expect all Board directors and employees to read and follow the Code. If you feel a colleague at Mighty Kingdom is in breach of the Code of Conduct, take action as you see appropriate. This may be by talking directly to your colleague, or escalating to a more senior person - the [Grievance Procedure](#) is a helpful guide.

Failure to meet the Code of Conduct requirements may result in disciplinary action, up to and including termination.

We prohibit retaliation against any worker who reports or participates in an investigation of a possible violation of our Code, policies, or the law.

1. BEHAVIOUR

Be kind, respectful and professional. Approach your colleagues with empathy and openness and assume they will do the same for you. Resolve conflicts respectfully, sometimes agreeing to disagree, and escalate a conflict through our [Grievance Procedure](#) if necessary. This behaviour extends to communication on Slack and other digital spaces.

a. A supportive Mighty team

We are a team and we lift each other up. We support others to bring their best selves to work - to create brilliant work, feel safe to fail and grow, and feel valued in their role. If only one person succeeds, or if just one person falls behind, the whole team fails. We try to bring our best selves to work each day, and when we cannot, our colleagues are there to support us.

b. Embrace diversity

We welcome and support people of all backgrounds and identities. Our different backgrounds, life experiences and ways of thinking mean we have a wonderful mix of perspectives at Mighty Kingdom. Our differences help us problem solve more effectively, create more inclusive games and generate interesting ideas. When conducting work, reflect on whether your biases are affecting who you include and do not include. Consider how others would like to be approached - things like considering and using correct gender pronouns go a long way. If you have a disagreement with someone, stay respectful and consider their perspective.

c. Take care of yourself

When you prioritise your health and wellbeing, you can be your best self and bring your A-game to work. When you are ill or need a mental health day, we



encourage you to take sick leave as opposed to working from home. Please do not come in to work if you are ill, as you might make others sick. Remember different people have different immunities, so a mild illness for you might have a big impact on another person. Annual Leave and Recharge Leave are there for you to use too, and we encourage you to use it.

Refer to our [Leave Policy](#) and [Work Health and Safety Policy](#) for further detail.

d. Feedback

Feedback is a good thing at Mighty Kingdom, it is how we grow as people and create better games. Give and take feedback respectfully and humbly. When you have feedback, first take a moment to consider the context of what you are commenting on, whether your feedback will be helpful, and if the timing is appropriate. When someone is giving you feedback, try to understand their position and how difficult giving feedback can sometimes be. If you disagree, do so respectfully.

If colleagues make decisions you don't agree with, it is essential to avoid undermining those decisions. Instead, re-open the conversation with them and win them over with your compelling and informed argument. If they do not change their position, you should accept and support the decision. However, if you feel a decision breaches our Code of Conduct, it is vital to escalate that issue (refer to our [Grievance Procedure](#)).

More detail on expectations around feedback at MK can be found in the Feedback Process.

e. Decision making

Gather information and make a decision quickly. Taking too long to find the "perfect" answer often results in missed opportunities and information. Make many small decisions often, as opposed to huge decisions rarely. When making a decision, check it is your decision to make by consulting with colleagues.

Keep in mind that some decisions will affect people other than yourself. If this is the case, it's a good idea to discuss the decision with these people and get some feedback before you enact it.

f. Lead by example

What you are willing to walk past you are willing to accept. Whether it is something as little as helping to keep the office tidy for ourselves and our guests, or a big change to the way we approach a part of our business. If you want to see positive change, be part of that change. This applies as an individual within Mighty Kingdom, and within the broader community.



Remember to reference the expectations outlined in this document when leading and making decisions.

g. Drugs and alcohol

We trust each other to keep our heads straight and minds clear at work. It's never okay to possess, use or be under the influence of illegal drugs while on the job. Abusing drugs or alcohol at work, or before work, can lead to safety issues, damage our business relationships, or hurt your productivity and innovation. Drinking at functions and client meetings is acceptable but be self-aware and use common sense.

h. Harassment

Harassment and exclusionary behaviour are not acceptable. This includes, but is not limited to:

- Threats of violence.
- Insubordination.
- Discriminatory jokes and language.
- Sharing sexually explicit or violent material via electronic devices or other means.
- Personal insults, especially those using racist or sexist terms.
- Unwelcome sexual attention.
- Advocating for, or encouraging, any of the above behaviour.

Please refer to our [Bullying and Harassment Policy](#) for more detail.

i. Violence

Violence, including threats, intimidation or any act of violence whatsoever is unacceptable. If you ever encounter or hear about workplace violence or threats of workplace violence, we encourage you to escalate this issue. If someone is in immediate danger, do not hesitate to contact the police.

2. RESPONSIBILITY

a. In your role

Understand what is expected of you in your role and clarify if you do not know. Try to actively stay informed about what is expected of you - it's your responsibility as much as it is your colleagues. If you don't know how to do something or have too much to do, ask for help!

b. The input/output chain

An effective input/output chain is core to an effective team. Assist the person before you in the pipeline who is handing their work to you, and try to hand over your work to the next person in the pipeline in the most useful way possible. Communication is a vital part of making the input/output chain work



- if your needs are unclear, colleagues delivering work to you will struggle to meet your expectations.

c. Making promises

Once you have made a commitment to do something, like in a project sprint for example, follow through on your commitment. If you don't think you can or something changes, let the most relevant people know as soon as possible and try to find the right solution.

d. Work hours

Our 'core hours' (i.e. the time of day ordinary hours are worked) are between 8:30am and 6pm on work days. Our work days are Tuesdays to Fridays.

You have the flexibility to choose your working hours whether they are across the core hours or the work days or not, as long as you are carrying out your role and obligations, and properly completing your assigned tasks. You just need to let us know how you want to spread your workload across the week, whether it is three day work week, or less hours per day over more days, or something else we agree with.

e. Meetings

Respect your colleagues' time by being prepared and punctual for stand-ups and meetings. Keep meetings short and purposeful, and have an agenda wherever possible. Everyone in a meeting is responsible for keeping it on track and meaningful. Focus on the meeting at hand and avoid using your phone/Slack/email for unrelated reasons.

f. Authority to make decisions

We value people's contributions and enthusiasm when thinking about how projects and Mighty Kingdom run. If a decision affects your team or the whole company, make sure you consult appropriately. Get endorsement on an idea from relevant colleagues before taking the next steps.

g. Working files

All of your work, including working files, should be in a place where others can access it if you are not available. Ensure your work is saved in the correct project or admin folder on Sharepoint or the local server, and that you sync regularly. Before creating a significant new folder, check with colleagues that something similar does not already exist.

h. Employee personal data

Keep the privacy of your colleagues safe.

Refer to the Data Breach Policy for further detail.



3. OUR CUSTOMERS

a. Respect our customers

Mighty Kingdom would not exist without our customers. Whether it's an Ava's Manor superfan, a Conan Chop Chop player, or the team at Mattel, we should show respect to our customers both outwardly and within Mighty Kingdom.

b. Game quality

Mighty Kingdom's point of difference is our phenomenal quality when it comes to artwork, robust development and game stability, and player retention and monetisation. We should strive to uphold the quality of the games that have come before and always be striving for improvements.

c. Customer privacy and safety

The safety and privacy of our customers is paramount. All products should be compliant with the EU General Data Protection Regulation (GDPR) and children's products should also be compliant with the United States' Children's Online Privacy Protection Act (COPPA). We are responsible to stay aware of changes in data and privacy law and to maintain compliance in new and existing apps. We are also responsible to ensure our ad partners are compliant.

d. Fair sales and marketing

We should not mislead our customers, whether they are our players or our business customers.

4. PROTECTING OUR COMPANY

a. Document it!

Document agreements and important details that could impact Mighty Kingdom, our staff, our customers and our partners. This could be agreements on projects, recording compliance of an app, or documenting a one-on-one with a peer. Make sure documents are in a safe, logical place and shared with relevant people.

b. Confidentiality

Don't share information that is not public knowledge outside of the company. If you're not sure, check with people in the know!

c. Physical assets and IT systems

Treat our property and systems with respect. If you notice something is broken, tell the relevant people so it can be fixed quickly or we can plan a fix.

Refer to the IT Security Policy for further detail.



d. Social Media

When posting in social media spaces relevant to Mighty Kingdom, please note that the opinions shared are your own and do not represent Mighty Kingdom.

e. Gifts from other parties

If we accept gifts, meals or entertainment from others, be aware that these can create conflicts of interest. Expensive gifts should be reviewed internally before being accepted.

f. Avoid conflicts of interest

When you are in a situation in which competing loyalties could cause you to pursue a personal benefit for you, your friends, or your family at the expense of Mighty Kingdom or our partners, you may be faced with a conflict of interest. All of us should avoid conflicts of interest and circumstances that reasonably present the appearance of a conflict.

Refer to the [Conflicts of Interest Policy](#) for examples of circumstances where conflicts of interest may arise and for more specific advice.

5. COMMUNITY**a. Games Community**

Mighty Kingdom has benefited from the experience and knowledge of many other companies and individuals in the games and entertainment industry. We want to be a part of creating healthy competition and a collaborative atmosphere in the games community both locally and abroad, and encourage employees of Mighty Kingdom to embody this vision. Mentoring within and outside of Mighty Kingdom, presenting learnings at conferences and forums, and attending networking events are all activities we heartily encourage!

b. Broader community

Mighty Kingdom wants to be an impactful business in the broader community, and we take initiative to be involved in several causes. These include but are not limited to:

- Inclusion of people with diverse backgrounds and identities in STEAM industries, through working towards a diverse team at Mighty Kingdom, internal education on inclusion, and involvement in organisations and events related to diversity.
- Games-related education and building awareness for students, through speaking engagements, placements, mentorships and tour groups.



- Inclusion and education in games for people in regional and disadvantaged areas.
- Being a loud voice to city, state and federal government to promote education and awareness of the games industry and create funding programs, incentives and tax offsets to support our industry and aligned industries.

c. Environmental

Mighty Kingdom acknowledges climate change is a real threat to the world, our way of life and the economy that our company survives on. We encourage our employees to reduce, reuse and recycle. Where possible, use a keep cup for your coffee, reduce single-use plastics like take-away containers (consider dining in!) and bottled water (water is free on tap!), and use the correct bins. If we have e-waste (including batteries), work with the office manager to organise collection rather than letting it go to landfill. Use public transport, cycle, skateboard, walk or drive your electric vehicle to work!

d. Charity

Volunteering for and donating to causes you care about are great ways to find extra meaning and purpose outside of work. If a peer shares a charity project they are involved in, show your appreciation. It's nice to work with people that care about stuff!

6. ACCESS TO THIS POLICY

This policy is available on the Mighty Kingdom website at <https://www.mightykingdom.com/investors-corporate-governance> and a copy will be provided to all new starters.

7. REVIEW

This policy will be reviewed by the Board as required and at least annually.

