

1.0 Overview

Being successful means ensuring that the trust, confidence and goodwill of all those with whom Credit Corp Group (**the Company**) deals with is maintained at all times. Our commitment to a Code of Conduct obligates every director and employee to practice the behaviour and principles that enhances trust and goodwill, and protects the Company's reputation in the community at all times.

2.0 Purpose

The Code of Conduct is a key element of the Company's corporate governance framework and its purpose is to provide information on the minimum standards of conduct expected of directors and employees, in the performance of their duties, including in their dealings with customers, clients, shareholders, employees and other stakeholders. Compliance to the Code of Conduct is a condition of employment, and as such, all employees and directors are required to comply with this Code of Conduct.

3.0 Code of Conduct

3.1 Your obligation to comply with this Code

Breaches of the Code of Conduct by any employee or director will be investigated and may lead to disciplinary action, up to and including the termination of employment. If the matter is criminal, it will be referred to the police or other appropriate authority.

3.2 Responsibility to our clients, customers and consumers and other stakeholders

Your personal conduct and actions both in and out of the workplace may have a significant impact on the Company's reputation. You are required to act with integrity, responsibility, honesty and professionalism in line with the policies, procedures and regulations as identified in the Company Code of Conduct and throughout the course of your employment within the Company.

In your dealings with our customers, clients, shareholders, employees and other stakeholders you are required to act in both an ethical and fair manner. In the course of our operations, you must not use physical force, harassment or coercion in connection with the collection of re-payments for loans or goods and services.

You must fully comply and promote compliance with the laws and regulations that govern the operations of the Company, and the Corporate Governance of the Company including this Code of Conduct.

These laws and regulations include but are not limited to:

- Work Health and Safety Act 2011 (NSW);
- Work Health and Safety Act 2011 (QLD);
- Occupational Health and Safety Act 2004 (VIC);
- Corporations Act 2001 (Cth);
- Australian Securities and Investment Commission Act 2001 (Cth);
- Competition and Consumer Act 2010 (Cth);
- Bankruptcy Act 1966 (Cth);
- Privacy Act 1988 (Cth);
- National Consumer Credit Protection Act 2009 (Cth);
- Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth);

- State Fair Trading Legislation;
- State Privacy Legislation;
- State Licensing provisions for Commercial Agents and Motor Dealers;
- Regulations and guidelines that support the above legislation; and
- Any conduct specifically authorised by a court.

Contravention of these laws and regulations can lead to significant penalties for both the Company and the individual. Management must ensure that any employee involved in duties covered by these laws and regulations is trained / accredited to the appropriate standard and that accreditation is maintained at all times.

3.3 Responsibility to our shareholders and the financial community

You will at all times endeavour to exercise due care and diligence in performing your duties and responsibilities.

The Company will ensure that we communicate with shareholders and the investment community appropriately and in a full, frank and timely manner.

You will protect and efficiently use the property and assets of the Company only for legitimate business purposes.

The Company is accountable for our actions and the financial performance of the Company to our shareholders.

The Company will adhere to best practice in our accounting policies and practices and ensure our financial reporting complies with all appropriate reporting and accounting standards.

Directors and employees should be aware that it is a breach of this Code of Conduct and the Corporations Act 2001 to in anyway interfere with the Company's external auditors in the carrying out of their duties.

3.4 Avoid conflicts of interest

Directors and employees must avoid or properly manage any circumstance that could result in a conflict of interest with, or be prejudicial to, the business of the Company and its stakeholders.

You must disclose any conflicts to the Company and take care when becoming involved in non-Company employment or business ventures whether it is as a principal, partner, director, agent, guarantor or employee. You cannot pursue an interest or other employment or business venture which directly or indirectly competes with the Company without the written consent of the Chief Executive Officer or in his/her case the approval of the Board.

You must ensure that your personal relationships and dealings with customers, clients, shareholders, employees and other stakeholders does not put the integrity of your business relationship with them at risk.

Do not accept commissions from service providers to the Company or provide commissions or incentives to clients of the Company.

You are not permitted to offer or to receive bribes or any other unlawful or unethical payments or inducements in the performance of your duties.

Ensure that all gifts are free from obligation or expectations of favours and report any offers of receipt of rewards, incentives or gifts to your manager.

You are not permitted to use the Company's property, information, position or opportunities sourced from the Company for personal gain or to compete with the Company.

In the event that a conflict of interest arises, you are to immediately inform your manager who will take action to protect the Company and depending on the circumstances may require you to no longer participate in the transaction, decision or activity while the conflict exists. Disclosure may also be made to both internal and third parties affected by the situation.

3.5 Use of electronic communications

The Company uses technology in its day-to-day operations through its computer network. Facilities such as computers, Company owned laptops, the internet, emails, telephones, faxes, and voice mail represent resources that are owned by the Company, and should not be abused.

You are responsible for your own conduct at all times and are not permitted to use the Company's computer network to offend, discriminate or harass customers, clients, shareholders, employees, other stakeholders or members of the public. This includes, but is not limited to, the sending, forwarding, uploading, downloading, using, retrieving or accessing any material (through email, internet or otherwise) that:

- is obscene, offensive or inappropriate. This includes text, images, sound or any other material (for example, material of a sexual nature, indecent or pornographic material)
- causes or may cause insult, offence, intimidation or humiliation by reason of unlawful harassment or discrimination;
- is defamatory or incurs liability or adversely impacts on the image of the Company;
- breaches another individual's privacy;
- reveals confidential Company information;
- is otherwise illegal, unlawful or inappropriate;
- may affect or have the potential to affect the performance of, or cause damage to or overload the Company's computer network in any way (including the spreading of computer viruses);
- gives the impression that you are making statements on behalf of the Company without the express authority of the Company.

If you receive inappropriate material through the Company's computer network, you should immediately notify Human Resources on each occurrence. If you accidentally connect to an inappropriate web site, disconnect immediately and notify your manager.

Internet and e-mail resources are the property of the Company and are restricted to Company related usage. Employees should only use the Internet for personal use during their designated break times or after hours.

Downloading of files from the Internet has the potential to compromise the Company's internal network security and greatly increases the threat of virus and other external attacks. In addition the downloading of files onto a user's personal computer, or onto network resources, places additional strain on these resources. Downloading of any non-work related files is not allowed without express written permission from management.

Use of e-mail should be limited to work related issues. All e-mails are the property of the Company whilst they are carried or stored on Company infrastructure.

The Company continuously monitors its computer network (including incoming and outgoing emails) to protect against viruses as well as its rights and property, and to ensure the proper use of its computer network.

The Company may at any time, access, review, monitor or disclose use (when required) of its computer network by any employee on a continuous and ongoing basis.

The Company monitors processes that cover all aspects of its computer network including email messages, internet use and Company computer hard drives.

If an employee uses the internet for personal and private reasons they should be aware that as a matter of process their personal information may be retained on the Company's computer network. In light of this, employees are encouraged to minimise personal use of Company computers.

By using the Company's computer network all employees acknowledge and consent to the Company accessing, reviewing, monitoring and disclosing their use of the computer network.

3.6 Share and insider trading

Sometimes you may have access to sensitive information about either the Company or another company that is not publicly known. At no time should you make use of private and confidential information for uses other than those approved by the Company.

In addition, it is a criminal offence to buy or sell listed shares or other types of financial securities if you are in possession of inside information that could affect the value of those shares or securities. The law also prevents you from passing on to others confidential information that could be used in that way.

Additionally, the Company's Security Trading Policy sets trading zones during which its securities or related securities cannot be traded by employees.

3.7 Protecting confidentiality and privacy

Information obtained during the course of your work must always be treated as confidential. Information may include client records and dealings, internal communications or information provided to the Company by account holders and their agents and representatives. Breaching confidentiality guidelines may be in violation of industry codes of conduct as well as State and Federal legislation and may have a serious impact on the credibility and standing of the Company.

Compliance with and promotion of the Company's Privacy Policy is required from all employees. The Company's Privacy Policy is available on its web site.

3.8 Making public statements and the media

Employees, and directors, unless otherwise authorised, are not permitted to make public statements about any aspect of the Company or its operations. Should someone be pressuring you to make public statements then this should be immediately communicated to your manager.

If you are contacted by the media, you are not permitted to make any statement and must immediately refer them to the Chief Executive Officer or Company Secretary.

3.9 Community

The Company is pleased to support community and the environment in the following ways:

- Donations - The Company provides donations to recognised charities following approval by the Chief Executive Officer.
- Environment - The Company has a policy to recycle all reusable office products subject to the appropriate destruction of confidential documents.

3.10 Whistle Blower procedure and protection

The Company values its reputation and the application of this Code of Conduct will continue to enhance and preserve the integrity and honesty of the Company. The maintenance of this reputation is critical to our ongoing growth and success.

To this end all staff who have reasonable grounds and who act in good faith are required to report preferably in writing or if in doubt to initially discuss any occurrence or suspected occurrence of unlawful or unethical behaviour or breaches of the Company's corporate governance to the Chief Financial Officer, a director, the Company's auditor or to the Australian Securities and Investment Commission (ASIC).

3.11 Application of the Code of Conduct

Should you require any assistance in the understanding or interpretation of the code please direct your enquiry to your manager, Human Resources or the Head of Legal, Compliance and Operation Strategy.

3.12 Review and continuous improvement of the Code of Conduct

The Code of Conduct and the level of compliance will be reviewed annually by the Board to ensure it remains consistent with both the Company's legal and community responsibilities and the Company's strategy and culture.

Your input to the code is welcomed and should be directed to the Human Resources.