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## Employee Code of Conduct

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### 1. Overview

- (a) Being successful means ensuring that the trust, confidence and goodwill of all those with whom Credit Corp Group Limited (Company) or its subsidiaries (Group or our) deals are maintained at all times. Our commitment to this Code of Conduct (Code) obligates every executive and non-executive director, officer, employee and contractor to the Group (Employees or you) to practice the behaviour and principles that enhances trust and goodwill, and protects the Group's reputation in the community at all times.
- (b) The Group is committed to complying with this Code and expects that all Employees comply fully with it. Employees should at all times comply with both the spirit as well as the letter of all laws which govern the operations of the Group and the principles of this Code. Further, Employees should always use due care and diligence when fulfilling their role or representing the Group and should not engage in any conduct likely to bring discredit upon the Group.

### 2. Purpose

- (a) 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 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 are required to comply with this Code of Conduct.
- (b) This Code of Conduct is also designed to assist with the practical implementation of the Company's stated values (which are available on the Company's website).

### 3. Code of Conduct

#### 3.1 Your obligation to comply with this Code

Breaches of the Code of Conduct by any Employee 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 Act with integrity

Your personal conduct and actions both in and out of the workplace may have a significant impact on the Group's reputation. You are required to act:

- (a) with high standards of personal integrity, honesty and professionalism in line with the policies, procedures and regulations as identified in this Code of Conduct and throughout the course of your employment within the Group;
- (b) ethically and responsibly; and
- (c) in accordance with the Company's stated values.

#### 3.3 Responsibility to our clients, customers and consumers and other stakeholders

In your dealings with our customers, clients, shareholders, other 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 conduct:

- (a) any dealings with politicians and government officials which relate to the Group and its business activities at arm's length with the utmost professionalism; and
- (b) yourself appropriately when interacting and communicating with others outside of the business. This includes at work functions, when representing the Group externally or in the use of social media. Any opinions expressed by an Employee must be clearly seen as the individual's opinion and not the views of the Group.

### 3.4 Safe working environment

You must:

- (c) treat other Employees with respect and not engage in bullying, harassment or discrimination;
- (d) take responsibility for safety by reporting any health or safety issues immediately; and
- (e) abide by the Group's health and safety policies (including any alcohol policies that apply) and follow safety instructions at all times.

### 3.5 Comply with laws and regulations

You must fully comply and promote compliance with the laws and regulations that govern the operations of the Group, and the Corporate Governance of the Group, 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 Group 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.

You must report any actual or potential breaches of the law, regulations, this Code or the Group's other policies to your manager, the Chief Executive Officer, Company Secretary or Compliance Manager or a relevant adviser. If ever in doubt, Employees should seek advice immediately.

### **3.6 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 Group only for legitimate business purposes. The Group is accountable for our actions and the financial performance of the Group to our shareholders.

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

Employees should be aware that it is a breach of this Code of Conduct and the *Corporations Act 2001* (Cth) to in anyway interfere with the Group's external auditors in the carrying out of their duties.

### **3.7 Avoid conflicts of interest**

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 Group and its stakeholders.

You must disclose, and deal appropriately with, any conflicts between their personal interests and their duties to the Group and take care when becoming involved in non-Group 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 Group 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, other 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 Group or provide commissions or incentives to clients of the Group.

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. You must always comply with laws against bribery, corruption and related conduct applying to the Group in all the jurisdictions where the Group operates.

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 or take advantage of the Company's property, information, position or opportunities sourced from the Group for personal gain or to compete with the Group.

In the event that a conflict of interest arises, you are to immediately inform your manager who will take action to protect the Group 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.

### **3.8 Use of electronic communications**

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

You are responsible for your own conduct at all times and are not permitted to use the Group's computer network to offend, discriminate or harass customers, clients, shareholders, other 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 Group;
- breaches another individual's privacy;
- reveals confidential Group 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 Group's computer network in any way (including the spreading of computer viruses);
- gives the impression that you are making statements on behalf of the Group without the express authority of the Group.

If you receive inappropriate material through the Group'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 Group and are restricted to Group 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 Group'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 Group whilst they are carried or stored on Group infrastructure.

The Group 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 Group 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 Group monitors processes that cover all aspects of its computer network including email messages, internet use and Group 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 Group's computer network. In light of this, Employees are encouraged to minimise personal use of Group computers.

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

### **3.9 Share and insider trading**

Sometimes you may have access to sensitive information about either the Group 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 Group.

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 Securities Trading Policy sets trading zones during which its securities or related securities cannot be traded by Employees. You must comply with the Company's Securities Trading Policy when trading in securities, including trading in securities of the Company.

### 3.10 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 Group 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 Group.

You must:

- use confidential information solely for the purposes of your duties;
- restrict the use of non-public information (whether specific to the Group or entrusted to it by others) except where disclosure is authorised or legally required; and
- respect and safeguard the privacy of personal information held by the Group regarding its clients, customers, suppliers, Employees and others.

### 3.11 Making public statements and the media

Employees, unless otherwise authorised, are not permitted to make public statements about any aspect of the Group 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.

### 3.12 Community

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

- Donations - Subject to the Group's Anti-Bribery and Corruption Policy, the Group provides donations to recognised charities following approval by the Chief Executive Officer.
- Environment - The Group has a policy to recycle all reusable office products subject to the appropriate destruction of confidential documents.

You must not make any donation or other financial contribution to any political party or candidate for an election or sponsor any organisations (other than in a purely personal capacity) without seeking and obtaining prior approval from the Chief Executive Officer, Company Secretary, or Compliance Manager.

### 3.13 Whistleblower 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 any occurrence or suspected occurrence of unlawful or unethical behaviour or breaches of the Company's corporate governance policies (including this Code). Reports may be made confidentially and on an anonymous basis. Please refer to the Whistleblower Policy for more details.

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## 4. Employment practices

The Group aims to provide a work environment in which all Employees can excel regardless of race, religion, age, disability, gender, sexual preference or marital status. The Group will not tolerate any form of harassment, violence, bullying, victimisation, vilification or discrimination in the workplace from any person working for or with the Group. The Group will from time to time maintain various policies relating to the workplace. Employees should familiarise themselves with such policies and ensure that they comply with them.

## 5. Reporting

You must report any breaches of this Code to the Chief Executive Officer, Company Secretary or Compliance Manager in the first instance. All material breaches of this Code must be reported to the Board or the Audit and Risk Committee.

## 6. Application of the Code of Conduct

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

## 7. Review and continuous improvement of the Code of Conduct

This Code of Conduct and the level of compliance will be reviewed annually by the Board, with the assistance of the Audit and Risk Committee, to ensure it:

- (a) operates effectively and whether any changes are required to this Code; and
- (b) remains consistent with both the Group's legal and community responsibilities and the Group's strategy and culture.

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