



Credit Corp Group

# Employee Code of Conduct

## 1. Overview

Being successful means ensuring that the trust, confidence and goodwill of all those with whom Credit Corp Group Limited (the Company) and its subsidiaries (collectively the Group) deals with are maintained at all times. Our commitment to a 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 Company's reputation in the community at all times.

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

The Code is a key element of the Company's corporate governance framework and its purpose is to provide guidance on the minimum standards of conduct expected of Employees, in the performance of their duties, including in their dealings with colleagues, customers, clients, shareholders, suppliers, employees and other stakeholders. Compliance to the Code is a condition of employment or engagement, and as such, all employees, contractors, officers and directors are required to comply with this Code. This Code is also designed to assist with the practical implementation of the Company's stated values (which are set out below and available on the Company's website).

## 3. Code of Conduct

### 3.1. Our values

Our values form part of our Code and describe how we behave and are apparent in everything we do. Our values are:

- Discipline – 'Doing the Right Thing'.
  - Doing the right Thing means having an ethical and controlled approach to everything that we do.
- Accountability – 'Making it Happen'.
  - Making it Happen is all about delivering the right results by taking responsibility for setting targets and measuring outcomes.
- Transparency – 'Being Open and Honest'.
  - Transparency means being open and honest in all that we do and drawing attention to challenges and problems in our business so that we can overcome them.

### 3.2. Your obligation to comply with this Code

Employees are required to ensure they do not breach this Code. Breaches of this Code by any Employee may be investigated and may lead to disciplinary action, up to and including the termination of employment or engagement. If the matter involves alleged criminal conduct, it will be referred to the police or other appropriate authority.

### 3.3. Appropriate workplace behaviour

All Employees have a responsibility to treat their colleagues, suppliers, contractors, customers and the general public with courtesy and respect and play a critical role in ensuring that our workplace is safe and free from bullying, harassment and discrimination. Discrimination or harassment of any kind will not be tolerated. Such

discrimination and harassment may constitute an offence under legislation and may also lead to disciplinary action, up to and including dismissal. These expectations extend to Company organised workplace events which may be held outside of the Group's offices as well as working from home arrangements that may be in place. All Employees are required to complete mandatory training around appropriate workplace behaviour following commencement of employment and annually thereafter.

Managers have an additional responsibility to ensure Employees are complying with Company expectations around appropriate workplace behaviour. Should an event arise which has the potential to breach Company policies or procedures, managers should intervene where it is safe and appropriate to do so to deescalate any potential harmful situations and report such conduct to the appropriate person or body within the Company – refer to the relevant section in this Code, or [risk@creditcorp.com.au](mailto:risk@creditcorp.com.au) for legal/regulatory matters, or [HR@creditcorp.com.au](mailto:HR@creditcorp.com.au) for people matters.

### **3.4. Safe working environment**

You must:

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

### **3.5. 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 Company policies, procedures and regulations and throughout the course of your employment or engagement with the Company.

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 or verbal force, harassment or coercion in connection with the collection of re-payments for loans or goods and services.

### **3.6. 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.

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);
- Work Health and Safety Act 2020 (WA);
- Work Health and Safety Act 2012 (SA);
- Fair Work Act 2009 (Cth)
- Anti-discrimination legislation (Federal and State)
- 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 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, Human Resources or the Head of Legal and Compliance. Any protected whistleblower disclosure must be reported to an eligible recipient as set out in the Credit Corp Group Whistleblower Policy. Employees may also make a disclosure to a solicitor in relation to a whistleblower disclosure for the purpose of obtaining legal advice or legal representation in relation to the operation of the whistleblower legislation. For more information refer to the Credit Corp Group Whistleblower Policy.

If ever in doubt, Employees should seek advice immediately.

### **3.7. 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, equipment 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 and the *Corporations Act 2001* (Cth) to in anyway interfere with the Group's external auditors in the carrying out of their duties.

### **3.8. Avoid conflicts of interest**

Employees must at all times act in the best interests of the Company and avoid or properly manage any circumstance that could result in an actual or perceived conflict of interest with, or be prejudicial to, the business of the Group and/or its stakeholders.

You must disclose in writing any conflicts or perceived conflicts to the Company 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 engage in other employment or business venture which directly or indirectly competes with the Group without the prior 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 do not put the integrity of your business relationship with them at risk.

Do not seek or accept commissions from service providers or suppliers to the Group or provide commissions or incentives to clients or customers of the Group.

In line with the Gifts & Entertainment Group Policy you are not permitted to offer or to receive bribes, kickbacks, gratuities 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 or receipt of rewards, incentives or gifts in line with the Credit Corp Group Gifts and Entertainment Policy.

You are not permitted to improperly use or take advantage of the Group's property, information, position or opportunities for personal gain or to compete with the Group.

In the event that a conflict or potential conflict of interest arises, you are to immediately inform your manager who, where required, 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 or potential exists. Disclosure may also be made to both internal and third parties affected by the situation.

### **3.9. Background Screening**

The Group conducts regular background screening tests during recruitment and throughout the employee lifecycle. These tests include but are not limited to:

- Australian Securities and Investments Commission (ASIC) Banned and Disqualified Register Check;
- Department of Foreign Affairs and Trade (DFAT) Consolidated List Check; and
- State and federal police checks. Employees have a responsibility to immediately disclose to Human Resources or a member of Senior Management any past, present or pending criminal investigations, charges, offences or convictions as soon as practically possible. This information will be assessed in conjunction with an employee's roles and responsibilities, the Group's best interests as well as our obligations to comply with regulatory bodies' and/or client requirements.

### **3.10. 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 and voice mail represent resources that are owned by the Group and should not be abused or used for illegal purposes.

You are responsible for your own conduct at all times and are not permitted to use the Group's computer network to offend, discriminate, bully 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 the image of the Group;
- breaches another individual's privacy;
- reveals confidential Company or 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 Company or Group without the express authority of the Company or 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 and the Information Technology department.

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 limited personal use during their designated break times or after hours and ensure that any personal use complies with the requirements noted above.

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 the prior 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 Company Group 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 Company and/or Group accessing, reviewing, monitoring and disclosing their use of the computer network.

### **3.11. Protecting confidentiality and privacy**

Information obtained during the course of your work must always be treated as confidential ("Confidential Information"). Confidential Information may include but is not limited to, 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 Company and 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.

Compliance with and promotion of the confidentiality provisions contained in the Group's policies, procedures and employment contracts is required from all Employees.

### 3.12. Share and insider trading

Sometimes you may have access to Confidential Information about either the Group or another company that is not publicly known. At no time should you make use of 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 periods 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 or other entities.

### 3.13. 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 the Chief Executive Officer, Company Secretary or Corporate Affairs and Communications 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, Company Secretary or Corporate Affairs and Communications Manager.

### 3.14. Community

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

- Donations - The Group provides donations to recognised charities following approval by the Chief Executive Officer;
- Volunteering – The Group allows employees to volunteer for approved charities; and
- Environment - The Group's Environmental Policy outlines its commitment to actions related to environmental impacts.

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 or in his/her case, the approval of the Board.

### 3.15. Whistleblower procedure and protection

Credit Corp is committed to the highest standards of conduct and ethical behaviour. We believe that by promoting an open, honest and transparent workplace, where compliance and fair dealing is central to all that we do, we have built stronger relationships with all our stakeholders including our clients, customers, investors, employees and regulators. To support these values, Credit Corp maintains regular and open dialogue with its employees, encouraging them to speak up if they have any concerns about suspected or actual wrongdoing and ensures that employees who report their concerns are supported and protected from detriment.

In general terms, a whistleblower is a person who reports wrongdoing to someone who is eligible to receive reports about those matters, such as an officer or senior manager of Credit Corp, or the relevant regulator.

Whistleblower disclosures may be made on an anonymous basis. Whistleblowers who report those matters are given certain rights and protections to ensure that they do not suffer detriment due to having reported, having been in a position to report, or having intended to report, such matters. All employees are protected by whistleblower legislation when making an eligible whistleblower report, and these protections may also extend to their relatives, spouses and dependents.



All Employees must read and comply with the obligations set out in our whistleblower policy to ensure that they do not breach to whistleblower protection laws.

For more information, please refer to the Credit Corp Group Whistleblower Policy.

#### **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 your Manager, Human Resources or the Head of Legal and Compliance in the first instance who will report any material breaches of this Code to the Board.

#### **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.

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

This Code and the level of compliance will be reviewed annually by the Board 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 Human Resources.