

# Code of Conduct

**Effective Date: 4/12/2024**



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## 1. Message from Scott Hartley

The Insignia Financial Code of Conduct is one of the ways we put our principles into practice.

Our Code is an important statement about who we are as an organisation. It sets out the standards of behaviour we expect of everyone at Insignia Financial – in everything we do, every day.

It is inextricably linked to our purpose – understand me, look after me, secure my future. We can't realise our purpose unless we adhere to the Code. Our Code should shape the way we interact with each other and our clients.

As CEO, I acknowledge my responsibility to lead by example. The Code has been approved by the Insignia Financial Board and endorsed by the Executive Team – all of whom are committed to upholding it.

**If you see a breach of the Code – say something.** At Insignia Financial, you are encouraged and expected to speak up. Do what's right, not what's easy.

**If you have any questions about the Code – please ask.** Reach out to myself, your people leader, our People and Culture team, or an Executive team member.

**If you have a chance to discuss the Code with your colleagues – take it.** People leaders, especially, should create opportunities to talk about our principles and standards with their teams.

Ultimately, we are all leaders when it comes to the Code. Each of us should aspire to be the example others look towards. This requires action from everyone. It starts with understanding the Code. Beyond this, we all need to actively demonstrate our principles and deliver to expectations.

We've set our bar high to help us achieve our ambition – to create financial wellbeing for every Australian.



**Scott Hartley (he/him)**  
Chief Executive Officer  
Insignia Financial Ltd

## 2. Our Commitment

Insignia Financial's Code of Conduct (Code) is the charter that we use to guide our professional interactions with each other. It shapes the expectations we have for our actions and for our behaviours. It's underpinned by our principles – be human, deliver what matters, stronger together, keep it simple and do what's right, not what's easy – which are at the heart of everything we do.

### Our strategy and people

Our Code was developed with input from our people and outlines the standards and principles we have agreed to adopt. As we work in our day to day roles to create financial wellbeing for every Australian, we all play a vital role in upholding the standards of the Code to ensure we meet the interests of our clients, the community and each other.

### Connecting us

Our Code is not just another policy or procedure, it models how we display our principles. Our Code connects us, provides guidance on expected behaviours and represents our commitment to adhering to the highest standard of ethical conduct.

### Our purpose

#### **Understand me, look after me, secure my future**

We recognise that living our principles and purpose means that we conduct ourselves and our business professionally and ethically. Our decisions and actions are shaped by the standards of our Code; our principles, behaviours and policies, underpinned by our strategic direction, which leads us to achieve our purpose. Core to our purpose is ensuring we meet the interests of our clients, deliver on our promises and commitments and strive to advance client outcomes in all that we do.

## 3. Scope

Our Code applies to all of us. All directors, senior executives, employees, contractors and any other person employed by the Insignia Financial group of companies (employees) must be aware of and comply with our Code, policies, procedures, guidelines and legal obligations.

Our Code applies to Insignia Financial's business activities in Australia and should be observed in conjunction with legislative and operational obligations and relevant Insignia Financial Policies.

Our Code provides us with a common understanding of our principles and expected standards of behaviour. In the event of any inconsistencies between our Code's requirements and Insignia Financial's statutory duties, the latter shall prevail.

Our Code states basic expectations but does not cover every situation that may be encountered while working at Insignia Financial. In the absence of a specific direction, we have a responsibility to act in good faith, practice good judgment, comply with the spirit of the Code and to seek assistance from management, a member the Risk Management team, or a member of the People and Culture team where required.

## 4. Our Principles

Our principles underpin our Code, help us make better decisions and guide our behaviours. We must demonstrate actions and behaviours that are aligned to our principles every day.

**Our principles are:**



### **Be human**

We treat those around us the way we'd like to be treated –openly, honestly and respectfully.



### **Deliver what matters**

We make sure we understand what matters to every client and we make it happen.



### **Stronger together**

Only by working together can we truly serve our clients.



### **Keep it simple**

We remove complexity.



### **Do what's right, not what's easy**

We back ourselves to make the right call. We speak up.

## 5. Our Culture

We treat each other, our clients and other employees with respect and stay true to our principles.

We contribute to building and creating a positive and safe environment.

We behave in a way that is respectful and conduct ourselves professionally at all times.

We are committed to promoting and supporting a culture with the highest standards of honest conduct, ethical behaviour and corporate compliance.

We are committed to ensuring we focus on client interests and to deliver on quality client outcomes in all we do and the decisions we make.

Our reputation and competitiveness are dependent on responsive, competent and motivated employees who have a good understanding of our business and environment.

Our agreed principles and behaviours shape our culture and are the foundation upon which we will deliver on our strategy.

## Mutual respect and diversity

**At Insignia Financial, we support and value diversity and inclusion and are committed to providing a workplace that is free from discrimination. We treat each other with respect and dignity and aim to foster a positive and productive working environment.**

We do not tolerate harassment or discrimination based on an employee's race, colour, sex, sexual orientation, gender identity, age, physical or mental disability, marital status, family or carer responsibilities, pregnancy, religion, political opinion, national extraction, social origin or any other status protected under applicable law.

Bullying, victimisation or isolation of other employees is strictly prohibited and will not be tolerated.

We are all required to:

- behave ethically and professionally towards other employees
- avoid behaviour which is, or might reasonably be perceived as, intimidating, discriminatory, harassing or bullying
- comply with and report any known or suspected breaches of our policies.

## 6. Our Policies

Our policies outline how we do things, our expectations, processes and procedures that we must follow. In addition, employees are required to know and adhere to Insignia Financial's internal rules developed to regulate and manage Insignia Financial's business operations.

These are outlined in our:

- policies
- online learning modules allocated to employees through My Insignia
- business rules, which are communicated to employees.

It is a condition of employment that employees comply with Insignia Financial's policies, which are amended from time to time.

Our Code interacts with the following Insignia Financial policies:

- Anti-Bribery and Anti-Corruption Policy
- Anti-money laundering and counter terrorism financing program – Parts A and B
- Incidents and Breaches Policy
- Confidentiality Undertaking
- Conflicts Management Framework
- Conflicts Management Policy
- Drug and Alcohol Policy
- Fraud Policy
- IT Code of Conduct Policy
- Acceptable Use of Technology Policy
- IT Security Policy
- Managing Performance and Conduct Policy
- Workplace Health and Safety Policy
- Whistleblower Policy
- Gifts and Entertainment Standard

It's every employee's responsibility to know our current policies and complete annual mandatory online learning modules and any other learning activities required by Insignia Financial. Copies of Insignia Financial's policies can be found on our intranet (HQ).

## 7. Our Code

Our Code represents our commitment to:

- act honestly, ethically and with high standards of personal integrity
- understand and comply with the letter and spirit of our Code: our principles, behaviours and Policies
- act in the best interests of our clients and protecting the interests and reputation of Insignia Financial
- demonstrate Insignia Financial's principles in our interactions and ensure that our behaviours and actions reflect our principles
- strive to create a harmonious and safe working environment that respects and encourages diversity and inclusion
- ensure that we work in an environment free from unlawful discrimination, lateral violence, harassment and bullying, and take action to prevent such behaviour
- not knowingly participate in any illegal or unethical activity
- prevent theft, fraud and corruption, including by taking responsibility for acting diligently to detect suspicious activity and to prevent Insignia Financial products and services from being used for money laundering or terrorist financing purposes
- respect and safeguard client and employee privacy and confidentiality
- ensure we do not use or attempt to use our positions with Insignia Financial or our credentials to obtain improper personal benefits, including by not sharing price-sensitive inside information, not taking bribes and not accepting gifts or benefits that do not comply with the Gifts and Entertainment Standard
- conduct our work safely and responsibly with due care and diligence
- comply with and work within our delegated authority
- report to Insignia Financial any legal or regulatory proceedings that we are personally involved in
- manage conflicts of interest to ensure that the best interests of clients, investors and members are upheld, including by ensuring that we identify, record and report actual or perceived conflicts in a timely and appropriate manner and cooperate with our Risk Management colleagues to manage any identified conflict, as well as involving the Member Office where appropriate
- maintain a focus on the delivery of quality member outcomes in all we do and the decisions we make
- maintain appropriate qualifications and standards of competence and commit to updating professional knowledge to keep abreast of industry developments and trends
- ensure that records are accurate, complete and processed in a timely manner

- disclose 'close personal relationships' with other employees where there are direct reporting lines or any actual or perceived conflicts between roles and responsibilities
- work promptly and confidentially with our People and Culture team in the first instance, and then Risk Management if appropriate, to find ways to avoid or address actual or perceived conflicts between any roles and responsibilities
- ensure that we demonstrate active compliance with Insignia Financial's cybersecurity guidelines by following IT policies and reporting breaches and any other suspicious activity promptly to the Cybersecurity Team.

Please refer to Insignia Financial's Policies for more detailed information.

## 8. Compliance with our Code

**Being aware of, and complying with, the laws and regulations under which we operate is a critical part of our business and is fundamental to who we are and what we represent.**

To maintain the respect and confidence of our clients, which in turn protects our brand and our reputation, it is essential that we comply with the spirit of our Code as well as the letter of the law.

We are required to know, understand and comply with our Code, review it annually and whenever we are requested to do so. We are ultimately responsible for exercising good judgment and are encouraged to ask questions and seek clarification from the Executive Team, Risk Management team or our People and Culture team if needed.

### Breaches of the Code

We are all responsible for building a sustainable business and for protecting Insignia Financial's reputation. We must promptly report any known or suspected breaches of our Code, other Insignia Financial Policies, or of any relevant law or regulation.

We are all accountable for our own actions, including for intentionally refraining from reporting the actions of another who we know is in breach, or who we suspect is in breach, of the Code.

Employees are encouraged to voice their concerns and to report instances where there are reasonable grounds to suspect unethical, illegal, fraudulent or undesirable conduct, without fear of intimidation, disadvantage or reprisal.

Insignia Financial will support and protect employees who, in good faith, report violations – however, it is considered a breach of our Code for an employee to make a deliberately false claim or report.

Employees may report breaches to their people leader, a member of the Risk Management function, or a member of the People and Culture team. Breaches of the Code of Conduct Policy are reported to the Board.

Employees may also report their concerns in accordance with the Whistleblower Policy which outlines the mechanisms in place for reporting matters and the measures in place to protect whistleblowers against reprisal or retaliatory action.

Compliance with the Code is a condition of our employment and failure to do so may constitute serious misconduct, could lead to disciplinary action or result in immediate termination of employment as well as legal proceedings.

### Where to go for further support

Sometimes we face issues that we don't feel can be resolved using the organisational processes outlined in our Code.

Our Employee Assistance Program (EAP), a service run through TELUS Health, is a free and confidential counselling service available to all employees and their immediate families, to provide support for work-related or personal matters.

Our EAP can be contacted 24 hours a day, seven days a week, and provides telephone consultations, online information, resources and face-to-face counselling. More details are available on HQ, our intranet.

## 9. Roles and Responsibilities

Role	Responsibilities
<b>General responsibilities</b>	<p>All employees are responsible for creating a performance focused environment, free of unacceptable behaviour, and where everyone who works at Insignia Financial is expected to respect the rights of their colleagues.</p> <p>All employees are responsible for notifying their People Leader or a member of the People &amp; Culture team, if they become aware of anyone not complying with the behavioural expectations contained in this policy.</p>
<b>People Leaders</b>	<p>Individuals who work in leadership and management positions at Insignia Financial must take all reasonable steps to ensure that Insignia Financial operates with a continuous improvement mindset and is kept free from unacceptable behaviour. To ensure this, People Leaders must:</p> <ul style="list-style-type: none"><li>• Be aware of, identify, act upon, report, prevent and actively discourage unacceptable performance and conduct</li><li>• Treat complaints (both formal and informal) very seriously and take immediate steps to resolve them in accordance with this policy</li></ul>
<b>People and Culture</b>	<p>The People &amp; Culture team is here to provide information to Insignia Financial employees, about this policy and are available to assist with identifying if a reported issue falls within the scope of a definition and the steps and options for resolving issues regarding unacceptable performance or conduct.</p> <p>Where formal investigation is necessary, People &amp; Culture will investigate claims impartially, and in accordance with this policy.</p>

## **10. Policy Breaches**

### **10.1. Consequences of Non-Compliance**

Non-compliance with this Policy may result in disciplinary action in line with the Code of Conduct, Managing Performance and Conduct Policy, and Consequence Management Framework. A breach of this Policy may be a breach of legislation or regulatory obligation. All breaches will be managed in accordance with the Incidents and Breaches Policy.

## **11. Policy Management Information**

### **11.1. Relevant Legislative and Regulatory Requirements**

This Policy supports compliance with the Fair Work Act 2009 (Cth), federal and state anti-discrimination legislation, and federal and state Occupational Health and Safety legislation.