

Lonsec



Lonsec Group **Code of Conduct**

August 2022

A message from our Chief Executive Officer

Welcome to the Lonsec Group Code Of Conduct

When I joined Lonsec in July 2021, one of my first goals was to meet with you all and get to know the people who make Lonsec such a great place to work. A year later, I continue to be so proud of the calibre of our people and what we stand for as an organisation.



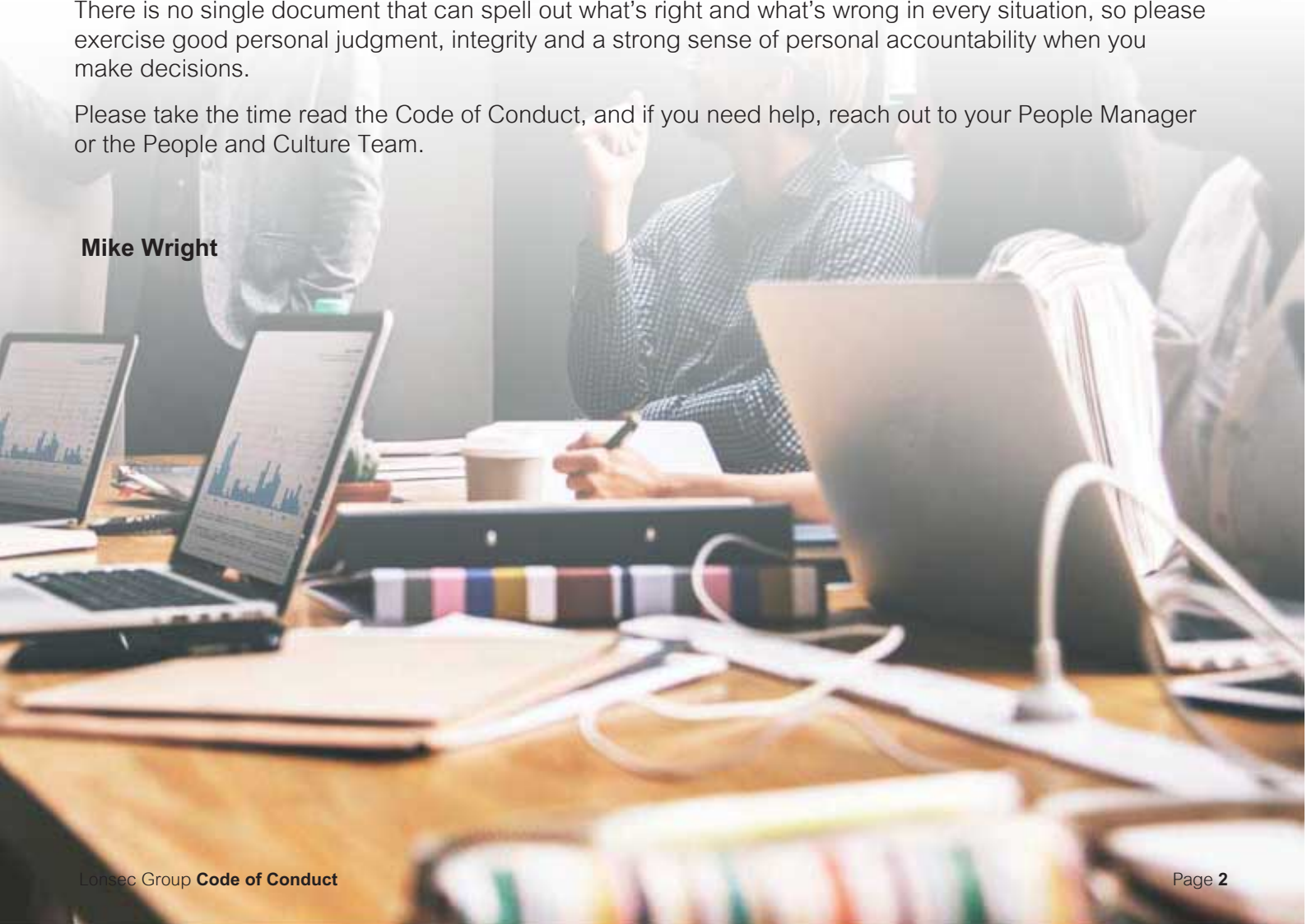
This Code of Conduct sets out to remind us what we stand for, of where we want to take Lonsec and what we must do to get there. This Code has been developed to help all of us live our values in everything we do, every day. It is the responsibility of all of us to exemplify these values in our everyday actions and interactions with our clients, colleagues and the wider community.

The Board and Executive Team is committed to fostering a culture and safe work environment that encourages all our people to report incidents or matters that they feel need to be without the fear of being disadvantaged. Encouraging a supportive, open and honest culture will allow us to continuously enhance and improve our business to be the pre-eminent investment partner in Australia and help clients and investors make better investment decisions.

There is no single document that can spell out what's right and what's wrong in every situation, so please exercise good personal judgment, integrity and a strong sense of personal accountability when you make decisions.

Please take the time read the Code of Conduct, and if you need help, reach out to your People Manager or the People and Culture Team.






Mike Wright



What the Code is about

Lonsec is committed to operating in line with the highest standards of conduct, behaviour and ethics. We strive to create an environment which allows all of our people to achieve their full potential. This Code sets out Lonsec Group's expectations for all our people in every part of the business, including our Board. It is a document to guide our interactions with one another. It is underpinned by our Strategy and Values underlying the way we do business and to ensure all employees, consultants, contractors and directors are aware of expected behaviours.

This Code is supported by a number of Lonsec Group's more detailed workplace policies and should be read in conjunction with those other policies.

Our Vision	To be the pre-eminent investment partner in Australia by helping clients and investors make better investment decisions.				
Our Values	 Independent thinking We never compromise on quality or objectiveness to deliver trusted, high conviction insights	 Integrity We stand behind our promises and always do the right thing by our people and client	 Client focus Our culture puts the client at the core and focuses on helping them achieve their goals	 Innovation We anticipate market needs and opportunities and develop contemporary solutions	 Collaboration We build great relationships and work in partnership with our clients and colleagues
Expected behaviours and conduct	<p>I speak up when unsure or when I need help, to help foster an environment where others feel able to voice their concerns</p> <p>I am open to change and welcome feedback to grow</p> <p>I put the customer and Lonsec ahead of personal interests and identify, declare, record and appropriately manage conflicts of interest</p> <p>I comply with relevant laws, regulations, internal policies and processes that govern Lonsec's business</p> <p>As a People Manager I "set the tone at the top" by actively practicing ethical behaviour and managing risk in accordance with the Lonsec Risk Framework</p>	<p>I take accountability for my actions and comply with relevant laws, regulations, internal policies and processes that govern our business</p> <p>I am proactive in finding and fixing problems</p> <p>I do the right thing and act with honesty, integrity and due care and skill in all my dealings with my colleagues, customers and suppliers</p> <p>I protect the privacy and confidentiality of Lonsec's information and maintain appropriate confidentiality regarding client information</p> <p>I assist Lonsec Group in reporting any fraud, or wrongdoing I observe by understanding my reporting obligations under the Lonsec Group Whistleblower Policy</p>	<p>I will not make any statement, behave in a way or publish anything which disparages, or could adversely affect the reputation of Lonsec Group, any Lonsec Group company and/or any of their employees, officers or clients</p> <p>I have the facts to back up my statements</p> <p>My conduct and behaviours when I work from home are no different from when I am in the office</p>	<p>I focus on my client's needs</p> <p>I look for new and better ways to innovate and improve Lonsec's business and client experience</p> <p>As a People Leader, I encourage my people to "think outside the box" for a more dynamic workplace without the fear of retaliation</p>	<p>I respect diversity and inclusivity and do not engage in conduct that is discriminatory or offensive</p> <p>Harassment, bullying or victimisation or other unacceptable or offensive conduct is not tolerated</p> <p>I make employment and business decisions based on merit and give credit to the contributions of others</p>

Observing the Code of Conduct

As a Lonsec representative, you are required to adhere to the Code of Conduct and complete Code of Conduct training, including an acknowledgement, on an annual basis.

Code of conduct and ethics outcomes

You must demonstrate our values in all your dealings, including when you are performing your duties, representing Lonsec Group, and interacting with your colleagues, clients, suppliers and other third parties. In particular, you must:

- comply with relevant laws, regulations, internal policies and processes that govern our business
- do the right thing and act with honesty, integrity and due care and skill in all our dealings with our colleagues, customer and suppliers
- ensure all financial and business reports are prepared fairly and accurately, in compliance with any applicable legal requirements and accounting standards
- put the customer and Lonsec ahead of personal interests and identify, declare, record and appropriately manage conflicts of interest
- not make any statement or publication which disparages, or could adversely affect the reputation of, Lonsec Group, any Lonsec Group company and/or any of their employees, officers or clients

Respectful communications, equitable treatment and diversity

At Lonsec Group, we are committed to the safety and security of our peers. We expect our people to treat others with respect and in a way that promotes harmonious and productive relationships and a safe working environment. In particular, you must:

- be courteous when communicating with your colleagues, clients, suppliers and other third parties. We expect our people to behave in a respectful manner at all times, and to promote a healthy working environment
- respect diversity and not engage in conduct that is discriminatory or offensive. Unlawful discrimination, harassment, bullying or victimisation or other unacceptable or offensive conduct will not be tolerated
- contribute to a safe working environment by taking responsibility for health and safety and reporting any issues or concerns

Ethical standards and conflicts of interest

At Lonsec, we only conduct business by lawful and ethical means. We expect our people to observe the highest standards of ethical behaviour and avoid any activity or interest that might damage the reputation of our group and brand name.

This means you must act in a manner that is consistent with Lonsec Group's best interests in all personal and business interactions. This extends to the way in which you do your work, represent Lonsec Group and interact with your colleagues, clients, suppliers and other third parties. In particular, you must:

- not undertake any other paid or unpaid employment or business activities, unless your external business interest has been declared to your People Manager and Risk and Compliance so this interest can be assessed. For the avoidance of doubt, you require written prior approval from your People Manager to take on these types of activities
- disclose any and all actual or potential conflicts of interest to People Manager in accordance with the Conflicts of Interest policy and procedures and only engage with suppliers in arm's length
- not do business with, or approve transactions on behalf of, family members or relatives and close friends in relation to matters affecting Lonsec or matters covered under this Code
- if in possession of inside information of any company, not buy, sell, recommend or trade, either personally or on behalf of someone else, securities or financial products of that company. You must also not disclose or communicate such information to others who may misuse it, including family
- attend work and work-related functions in a fit and proper condition, unaffected by drugs or alcohol
- act ethically when using social media. Your behaviour on social media can not only affect you personally and professionally but may also impact Lonsec's brand and reputation



Quality and confidentiality

You must maintain the highest standards of quality in everything that you do and play an active part in managing these expectations in all aspects of your work. In particular, you must:

- use Lonsec managed devices and applications, the internet and email for personal use in limited circumstances. The use of resources may be monitored and inspected to ensure productivity is not negatively impacted
- protect the privacy and confidentiality of Lonsec Group's information and maintain appropriate confidentiality regarding client information. It is expected that you take all necessary steps to protect such information from misuse or unauthorised access, and report any improper disclosure immediately to your People Manager
- properly care for and protect Lonsec assets from theft, loss, carelessness and cyber security threats
- assist Lonsec Group in reporting any fraud, or wrongdoing you observe by understanding your reporting obligations under the Lonsec Group Whistleblower Policy

Obtaining support and reporting concerns

Lonsec Group acknowledges that it cannot formulate policies to address all issues which may arise in day-to-day work. To this end, we further expect all our people to take responsibility for their own behaviour in light of these stated values and ethics. If you are unsure about the Code of Conduct or any of our workplace policies, please reach out to your People Manager or People and Culture who are able to support you further.