

# **EQT GROUP CODE OF CONDUCT AND ETHICS**



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# STATEMENT OF POLICY

## COMMITMENT

The Equity Trustees Group (Equity Trustees) is committed to achieving sustained performance and delivering value to our customers and shareholders while maintaining high standards of integrity and ethical behaviour.

Equity Trustees adheres to the ASX Corporate Governance Principles and Recommendations and the Financial Services Council Standards of ethical and professional conduct and corporate governance.

## PURPOSE

The Code of Conduct and Ethics (Code) sets standards for the way we do things at Equity Trustees and provides a set of guiding principles to help you make decisions in your day to day roles.

In some circumstances, this will include times when you are outside your immediate workplace or working hours, for example at work functions, out of hours work activities or when you are out in the community on behalf of Equity Trustees.

The Code is not a substitute for good judgement and incorporates the shared values that guide how we interact with each other, conduct our business and build relationships with our clients.

## APPLICATION

This Policy applies to all directors, employees and contractors of Equity Trustees, and its controlled entities, including when acting at Equity Trustees request in operational roles or as directors for other entities.

## REVIEW

The Code will be reviewed every three (3) years.

It is the Policy Owner's responsibility to ensure that, should there be any significant change in the internal or external environment within this time, a review is conducted immediately.



# POLICY PRINCIPLES

## VALUES

At Equity Trustees we are committed to and demonstrate the following values and attributes:

- Trusted
- Valued
- Accountability
- Integrity
- Clarity
- Partner

No matter what your role or location you are expected to demonstrate the behaviours outlined in this Code, set an example for others around you and speak out when you feel that these behaviours are threatened or compromised.

### 1. Trusted

We are trusted. We do what we say we will; we do the right thing.

Our success depends on the trust of our customers. This is earned by acting with honesty and integrity with all dealings with customers and colleagues.

You must:

- Demonstrate open and direct communication
- Maintain accuracy and truthfulness
- Be mindful of compliance responsibilities
- Develop trusted relationships
- Provide excellent service
- Encourage debate without blame or prejudice
- Avoid or notify conflicts of interest

### 2. Valued

We feel valued. We are inclusive and respectful. We appreciate and celebrate success.

Equity Trustees values diversity and is committed to achieving a diverse workforce that is inclusive and respectful of each other's differences.

We are all expected to treat everyone that we deal with through our work at Equity Trustees with dignity and respect. Unlawful discrimination, harassment, bullying or victimisation, or other unacceptable or offensive conduct will not be tolerated.

Equity Trustees is committed to providing a safe working environment that promotes wellbeing safety, security and physical and mental health of our people.

You must:

- Be polite and appropriate
- Embrace diversity and change
- Be patient and actively listen
- Value other's priorities and opinions



### 3. Accountability

We demonstrate accountability. We take responsibility. We own, fix and learn from our mistakes.

Equity Trustees expects all employees and directors to comply with all applicable requirements and duties imposed on the business and particular roles including:

- legal
- regulatory
- fiduciary and
- internal policies and standards.

Equity Trustees has a range of established corporate internal policies to support compliance with the various laws, relevant industry standards/policies along with documented plans, controls and ongoing monitoring at all levels of the business. You must:

- Take ownership and be accountable
- Accept responsibility for your actions
- Takes responsibility for your decisions
- Demonstrate accuracy
- Act in a timely manner with a sense of urgency

### 4. Integrity

We act with integrity. We behave with the highest standards without exception.

Our shareholders, customers and the broader community expect everyone who works at Equity Trustees to act professionally and ethically at all times. In everything you do you should consider how your or someone else's actions could impact on Equity Trustees reputation and performance and take action to prevent or remedy anything that could adversely impact Equity Trustees.

You must:

- Act with integrity
- Act in the best interest of our stakeholders
- Display fairness and objectivity
- Demonstrate Equity Trustees principles of professional conduct

### 5. Clarity

We value clarity. Our communication is clear and transparent. We have shared goals.

Equity Trustees values clear, concise and transparent communication to our employees, shareholders and customers and is committed to achieving our shared goals. We are all expected to be clear in our communications and consistent in our behaviours so we can achieve our shared goals.

You must:

- Be clear and transparent in your communication
- Communicate effectively across Business Units
- Have clear goals and objectives
- Align with our strategic goals
- Communicate with honesty and integrity



## **6. Partner**

We partner with you. We build relationships, collaborate and overcome challenges together.

Equity Trustees aims to deliver sustainable long-term shareholder return, by creating a high performing culture for our employees, clients and business partners. In striving to work collaboratively to achieve our aims, we should not compromise our ethics and principles.

You must:

- Demonstrate and foster a culture of collaboration and information sharing
- Act in Equity Trustees best interests at all times
- Be resilient, agile and innovative together
- Focus on building united critical capabilities



# ACCOUNTABILITIES

## Directors

- The Lead by example and always act in accordance with the Code.
- Charge management with the responsibility for creating a culture which supports the Code.

## Management

- Management must be familiar with, and always act in accordance with the Code.
- Ensure that your employees comply with the Code.
- Report suspected breaches of the Code to Human Resources or Enterprise Risk.
- Ensure that reports are based on truth and fact and are made in good faith.

## Employees and contractors

- You must be familiar with, and always act in direct accordance with the Code.
- Report suspected breaches of the Code to your Line Manager, Human Resources or Enterprise Risk.
- Ensure that reports are based on truth and fact and are made in good faith.

## Breaches

- Equity Trustees takes a breach of the Code seriously and all reports will be investigated and may result in disciplinary action.
- Intentionally false or malicious reports will result in disciplinary action.

## Whistleblower

There may be times when it is inappropriate to report a breach to your Line Manager, Human Resources or Enterprise Risk. In this circumstance you should raise your concern to the Equity Trustees Whistleblower Protection Officer (WPO).

## Where to get help

Additional information about this Code can be found on the Enterprise Policy Portal, or by contacting your Line Manager, Human Resources or Enterprise Risk.



## POLICY ADMINISTRATION

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Document Title	Code of Conduct and Ethics
Policy Level	1
Version No.	V.1 / 2019
Policy Owner	Managing Director
Related Policies	
<i>(These must be read in conjunction with policy)</i>	
Supporting procedures or guidelines	
<i>(These must be read in conjunction with policy)</i>	
Approval Date	30 March 2017
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Review and Approval Body	HRRNC, EQTHL, ETSL, ETWSL, EQTL

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## DOCUMENT VERSION CONTROL HISTORY

VERSION NO.	UPDATED/PREPARED BY	DATE	APPROVED BY
V1/2019	ER – Transfer to new template no approval required.	12/03/2019	N/A