

## Introduction

The La Trobe Financial Code of Conduct provides a framework of principles for its employees to ensure the highest standards of behaviour and ethical conduct in their dealings with customers, colleagues, other stakeholders, or members of the public. It applies to all directors, senior executives, employees, executives, and contractors of La Trobe Financial, hereafter collectively referred to as "employees".

### 1. Confidentiality Undertaking

I undertake to keep all information which I receive during the course of my employment strictly confidential, and not to disclose the information, including by way of any social media, to any external parties, either during my employment or following termination. Confidential information includes, but is not limited to:

- a. the details of any customer;
- b. the nature or extent of the business affairs of any customer;
- c. the details, contents or operations of any client/solicitor/ referrer/third party lists used by La Trobe Financial or related companies; and
- d. information regarding La Trobe Financial's operations, processes, computer systems, customers, employees and service providers.

The obligation of confidentiality is subject to the performance of my duties as an employee of La Trobe Financial and any law which may compel me to disclose information to a Court, regulator, tribunal or other legal body.

### 2. Books and Records

It is the policy of La Trobe Financial that its books, records, and disclosures are accurate and that all business transactions are properly authorised. The books and records of the company must reflect all its transactions in order to permit the preparation of accurate financial statements. Accordingly, I undertake to never conceal information from:

- a. an external auditor;
- b. an internal auditor; or
- c. an audit committee of the company.

In addition, I acknowledge that it is unlawful for any person to fraudulently influence, coerce, manipulate or mislead an external auditor of the company.

### 3. Standards of Conduct

In performing my duties as an employee of La Trobe Financial. I undertake to:

- a. act in accordance with La Trobe Financial's values and in the best interests of La Trobe Financial;
- b. service, manage and supervise La Trobe Financial's customers, their investments and loan accounts to the highest reasonable standard expected of an employee of a prudent mortgage lending and investment service institution;
- c. exercise all reasonable skill and care;
- d. comply with the terms and conditions and standards of conduct outlined in this document and the [Employee Handbook](#);
- e. efficiently, honestly, with high standards of personal integrity and fairly manage and administer the affairs of La Trobe Financial's clients and suppliers in accordance with sound responsible lending and investment practices and the law including, where applicable, the *National Consumer Credit Protection Act 2009* and the *Corporations Act 2001*;
- f. act ethically and responsibly;
- g. treat fellow staff members with respect and not engage in bullying, harassment or discrimination;
- h. comply with La Trobe Financial's [Conflicts of Interest Policy](#);
- i. not take advantage of the property or information of La Trobe Financial's clients for personal gain or to cause detriment to La Trobe Financial or its clients;
- j. not take advantage of my position or the opportunities arising therefrom for personal gain;
- k. comply with La Trobe Financial's Technology Code of Conduct;
- l. comply with all other La Trobe Financial Policies;
- m. practice responsible stewardship of all La Trobe Financial resources;
- n. ensure that La Trobe Financial's borrowers are not disadvantaged as required under the *National Consumer Credit Protection Act 2009* and our investors' interests prevail over those of La Trobe Financial as required under the *Corporations Act 2001*;

- o. adhere at all times to all laws and regulations that apply to La Trobe Financial and its operations; and
- p. immediately notify La Trobe Financial if found guilty of any act of dishonesty, criminal activity or breach of fiduciary duty.

## 4. Harassment, Bullying and Discrimination

La Trobe financial will not tolerate discrimination, harassment or any behaviour or language that is abusive, offensive, or unwelcome. Employees should seek advice from an appropriate manager where a colleague's behaviour is perceived to be in breach of this Code of Conduct, and report any suspected corrupt, criminal, or unethical conduct to The Chief People & Marketing Officer or the Chief Risk Officer.

- a. I acknowledge that it is unlawful to engage in any form of inappropriate workplace conduct including:
  - Discrimination on the basis of any of the protected attributes\*
  - Harassment including sexual harassment and harassment on the grounds of sex
  - Workplace bullying
  - Workplace violence
  - Vilification
  - Victimisation
- b. I acknowledge that I am responsible for the health and safety of myself and others in the workplace;
- c. I acknowledge that inappropriate workplace conduct creates a risk to health and safety; and
- d. I acknowledge that it is unlawful to victimise another person for raising concerns about inappropriate workplace conduct or health and safety.

\* Further information, including a full list of protected individual attributes, is contained in La Trobe Financial's [Anti Bullying and Harassment Policy](#) which I have read, acknowledge and accept as part of my acknowledgment and acceptance of this Employee Code of Conduct.

## 5. Alcohol and Illicit Substances

La Trobe Financial is committed to maintaining a safe, healthy, and productive work environment. The use of illicit drugs or the misuse of alcohol is strictly prohibited in the workplace, during work hours, or while representing the organisation in any capacity.

I hereby acknowledge the following:

- a. Alcohol consumption is not permitted during work hours or on work premises, except where expressly authorised (e.g. at approved work functions or events). Further information is contained in the [Social & Corporate Events Policy](#);
- b. I will not be impaired by alcohol while performing my duties and will ensure responsible consumption at all work-related events where alcohol is served;
- c. I will ensure that the use of any prescribed medication does not impair my ability to perform my duties safely and effectively and will immediately disclose any condition or impairment that may affect my performance or safety at work;
- d. I understand that the use, possession, distribution, or sale of illicit drugs or non-prescribed controlled substances is strictly prohibited at all times; and
- e. I will not attend work under the influence of illicit substances.

## 6. Privacy and Ethics

I am committed to maintaining the highest standards of ethical conduct and good practice, and I will:

- a. act honestly, fairly and professionally in my dealings with borrowers, investors and third parties;
- b. observe confidentiality and act in a way which protects La Trobe Financial and its customers' rights to privacy; and
- c. ensure prompt response and handling of complaints through [La Trobe Financial's Complaints Policy Manual](#) to ensure efficient, fair and unbiased attention, no matter the monetary amount involved.

## 7. Insider Trading

- a. In relation to investments in the Select Investment Account of the Credit Fund, I shall not enter into any investment (either directly or through an intermediary entity, associate or third party) unless any investment opportunities in which I invest have been offered to external third parties for a period of at least two (2) business days prior to the placement of my personal investment funds;
- b. I shall maintain confidentiality of investment sensitive information available to me as an employee from other employees and business relationships with other customers of La Trobe Financial, and in this context investment sensitive information is information which is not generally available but which, if it were, would be expected by a reasonable person to have a material effect on the decision by a third party to invest in a La Trobe Financial investment product, before me;
- c. I will not unfairly use investment sensitive information for my own personal gain particularly in relation to individual investments, which are available on an ongoing basis; and
- d. I hereby undertake that I will abide by [La Trobe Financial's Security Trading Policy](#) which I have read, acknowledge and accept as part of my acknowledgment and acceptance of this Employee Code of Conduct.

## 8. Fraud

I hereby accept that any act of fraud will result in immediate dismissal and may give rise to civil or criminal prosecution.

## 9. Social Media Policy

I hereby acknowledge and understand that:

- a. access to social media for personal use should be kept to a minimum during work hours;
- b. my professional and personal use of social media should always consider the best interests and reputation of La Trobe Financial and its employees and customers at all times;
- c. I am responsible for ensuring that any social media content which references La Trobe Financial or its activities, must not breach applicable legislation, including laws related to copyright, privacy and financial disclosure; and
- d. I must ensure that any social media content is factually accurate and compliant with La Trobe Financial's policies and that any advertising of La Trobe Financial's products on social media must be pre-approved by the Marketing & Legal teams.

I acknowledge that La Trobe Financial may take disciplinary or other action against its employees in regard to inappropriate use of social media, including in relation to content which is posted outside of work hours.

## 10. Anti Corruption Policy

I hereby undertake that I will abide by [La Trobe Financial's Anti-Corruption Policy](#) which I have read, acknowledge and accept as part of my acknowledgment and acceptance of this Employee Code of Conduct.

## 11. Sensitive Documents

I hereby agree that documents which are no longer required and may be of a sensitive or private nature will be disposed in a secure disposal bin at La Trobe Financial's offices.

## 12. Transaction Restriction

I am prohibited from setting up, processing or transacting on my own personal loan or investor account or accounts of relatives and related parties and I am bound (where applicable) by the Declaration of Related Party Employees.

## 13. Cessation of Employment

I acknowledge that, upon cessation of employment, I will advise my immediate manager and/or department executive of any passwords or restrictive procedures used by me to access the files and reports maintained on La Trobe Financial's database.

I further acknowledge that if I do not provide all relevant access to the documents, La Trobe Financial will employ an IT specialist to gain access to same, the cost of which will be borne by me and La Trobe Financial reserves its right to take legal action if the costs are not paid.

## 14. Breach of the Code of Conduct

All La Trobe Financial employees must comply with this Code of Conduct and report any breaches to the Chief People and Marketing Officer. Reported breaches will be investigated, and appropriate action will be taken where misconduct is confirmed. Disciplinary measures may include:

- a. Counselling;
- b. Written warning(s); and/or
- c. Termination of employment.

Serious misconduct may result in summary dismissal. Each case will be assessed on its individual merits.

### Periodic Review

This Code of Conduct will be periodically reviewed to check that it is operating effectively and whether any changes are required.