



## **EMPLOYEE AND DIRECTOR CODE OF CONDUCT**

This code of conduct has been approved by the Board of Centuria Capital Limited (“the company” or “Centuria”) and sets the standard by which all officers and employees of the company will conduct themselves in the course of their duties.

### **1. Honesty and Integrity**

1.1 We are to act honestly and with integrity.

### **2. Care and diligence**

2.1 We exercise due care and diligence in the conduct of our duties.

### **3. Conflicts of interest**

3.1 In circumstances where our personal interests conflict with that of the company or its customers, we must take action to remove or manage the conflict having regard to the interests of customers.

### **4. Confidentiality**

4.1 We do not make use of confidential information obtained in the course of our duties for personal gain or to the detriment of the company.

4.2 We take all necessary steps to ensure that confidential information relating to customers, Centuria employees or Centuria’s operations are not given to third parties without the consent of the company.

### **5. Privacy**

5.1 We hold and use personal information in relation to customers, employees or other persons in accordance with privacy laws.

### **6. Fair Trading and Dealing**

6.1 We do not engage in misleading, coercive or deceptive conduct or provide false or misleading information either directly or by omission.

6.2 We do not engage in unconscionable conduct, that is, we do not take unfair advantage (beyond conscience and reasonableness) of superior position or bargaining power to obtain a beneficial bargain.

## **7. Improper use of information**

- 7.1 We do not make improper use of inside information gained in the course of our employment with the company in order to gain, or seek to gain, a benefit or advantage for ourselves or for any other person.

## **8. Compliance with the law**

- 8.1 We take all necessary steps to comply with any applicable laws.

## **9. Employment practices**

- 9.1 We use company resources appropriately and in accordance with any applicable company policy.
- 9.2 We treat all customers, fellow employees and other persons with respect and courtesy and without harassment.
- 9.3 We take all steps necessary to maintain a safe work environment.
- 9.4 We do not accept benefits such as gifts or entertainment when the situation could be seen as creating an obligation.
- 9.5 We do not accept or provide gifts or entertainment that can reasonably be seen as excessive or that will reflect negatively on the reputation of the company.
- 9.6 We do not give or accept bribes.
- 9.7 We are to act efficiently when providing our services to customers.

## **10. Monitoring Compliance with the Code**

- 10.1 The monitoring of compliance with this code of conduct has been incorporated with the company's compliance monitoring processes.
- 10.2 As deemed appropriate, specific procedure and policy may cover aspects of this code of conduct.