



The Resimac Way

CODE OF CONDUCT

- March 2019 -

Our Values

Quality

We are continuously looking for ways to do things better and seek the participation of all who can help bring the accomplishment of objectives.

Passion

We are focused on creating an environment which is professionally stimulating that encourages and rewards staff who are passionate and driven to enable success of the business.

Respect

We are creating an environment of respect for all stakeholders, senior and junior team members, customers and service providers.

Accountability

We require everyone to be accountable for their actions and decisions. In order to achieve an environment of accountability we acknowledge the requirement to empower staff and arm them with the tools to perform.

Professionalism & Integrity

We are committed to a code of conduct that promotes professional behaviour driving the business and its employees to at all times act with integrity. We acknowledge that our professional and personal reputations are paramount to the success of the business.

Agility

We operate in a changing world, in order to prosper we are open to and embrace change in all aspects of our business.

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The Code in Context

The Code of Conduct (the Code) sets out clear guidelines and standards for the behaviour and conduct required while at work for all members of the Resimac Group and its subsidiaries (“Resimac”).

This code provides an overview of Resimac’s fundamental values, it is by no means exhaustive, but summarises some of Resimac’s key policies.

Scope

The code applies to all employees of Resimac and its majority-owned subsidiaries and is to be followed by anyone who works for or represents Resimac. This includes: employees (full-time, part time, and casual) directors.

The code applies to an employee’s regular workplace (even if not working), to a temporary or alternate workplace, during business related trips, attendance of work related functions as well as when the employee is on leave or not otherwise working.

The code operates in conjunction with other policies relating to minimum standards of behaviour and conduct, the contract of employment as well as relevant rules and regulations.

This Code will commence from the date of this document. It replaces all other codes of conduct of the Resimac Group, if any (whether written or not).

Personal and Professional Behaviour – Your Obligations

Resimac employees are required to perform their duties in a professional, courteous and responsible manner with due regard for Resimac policies and procedures, other legal requirements and our licensing obligations. Our code reflects the principals and values that define how we treat each other and how we keep our workplace safe, diverse and inclusive.

Resimac employees are expected to:

- Treat all people in a non-discriminatory manner with proper regard for their rights and dignity. Discrimination, victimization or harassment based on a person’s race, age, colour, religion, national origin, sex, sexual orientation, marital status, pregnancy or potential pregnancy, mental or physical disability or any other classification protected by law will not be tolerated
- Employees are to act in a way that aligns to the Resimac values, treating everyone with courtesy, respect, kindness, consideration and sensitivity to their rights
- Observe the highest standards of ethics, integrity and behaviour during their course of employment or engagement with Resimac and be accountable for their actions
- Comply with all reasonable directions from your relevant managers as well as all applicable laws, policies, procedures, rules, regulations and employment contracts
- Refrain from taking improper advantage of any official information gained in the course of their engagement with Resimac and not enter into any arrangement that would be seen as a conflict with the interests of Resimac
- Dress appropriately in a manner that, maintains respect, professionalism and upholds the good reputation of the Resimac Group in line with the Resimac Dress Code policy

- Refrain from behaving in any manner that may unfairly harm the reputation of Resimac and its employees
- Never report for work in circumstances where there is a risk that you could be affected by or “under the influence” of illegal drugs or alcohol (For example, if you have ingested or otherwise taken drugs or alcohol the night before or in the period leading up to your next work period and remain affected).

Resimac Executives and Directors are, in addition to the above requirements, expected to:

- Act with independence, accuracy and integrity in their dealings with the Resimac Board, Board Committees, Auditors, other senior managers and all external stakeholders
- Ensure dealings with Resimac employees, stakeholders and the general public are transparent
- Demonstrate and promote a high standard of conduct with respect to honesty, fairness, integrity, diligence and competency.

Personal and Professional Behaviour – Manager’s Obligations

It is expected that Managers should promote a culture of ethics and compliance. As a Manager, you should:

- Ensure your team understand their responsibilities under this Code; and
- Create an environment that encourages employees to feel comfortable in raising concerns without fear of retaliation.

Conflicts of Interest

Resimac’s commercial interests and your personal interests must be managed so as not to compromise your ability to make sound, objective business decisions.

We can encounter potential conflicts every day, it is imperative for all employees to avoid even the appearance of a conflict of personal interest and that of the business.

All conflicts of interest must be:

- Openly disclosed as per the Conflicts of Interest Policy
- Managed transparently
- Managed in consultation with the employee’s relevant General Manager and Compliance

More information regarding Conflicts of interest can be found in the Conflicts of Interest Policy.

Prevention of Fraud and Corruption

Resimac does not condone activities that give rise to fraud or corruption, employees are not to engage in such activities that may lead to even the appearance of fraud or corruption.

All employees are responsible for the detection and prevention of fraud and corruption. Fraudulent or corrupt activity involves dishonest actions, or dishonestly failing to act that causes actual or potential financial loss, or an unjust advantage.

- Theft of money, data or property

- Deliberately falsifying, concealing or destroying documents
- Acts of Bribery

If you suspect fraud or corrupt activity is happening, or you are pressured by a colleague or customer to ignore the law or company policy and procedures, tell your Manager, Compliance or the Human Resources department as soon as practicable. Please refer to our Whistle Blower Policy for more information

Workplace Health and Safety

Resimac is committed to providing and maintaining a safe working environment for all employees and visitors.

Every employee is responsible for making health and safety a priority and should:

- Promptly report unsafe or hazardous conditions to the Workplace Health and Safety Committee (A list of the committee members can be found on the company intranet)
- Comply with all policies, laws, regulations, and standards relating to the conditions of employment, including those concerning hours, wages and other working conditions.
- Comply with applicable workplace health and safety laws, regulations and standards as well as the Resimac Workplace Health and Safety Policy.

Data Protection and Confidential Information

Employees must undertake reasonable efforts to protect customer, individual or business information from misuse, unauthorised access, interference or loss and must ensure such information is securely stored. Due to the nature of our business and the technology we use we are exposed to confidential and private information

At Resimac we are committed to maintaining the confidentiality and security of information, this includes;

Customer Personal and Credit Information:

All personal and credit information is to be accessed for legitimate business purposes only, shared only with those who are allowed access and protected in accordance with the relevant data protection policies and laws.

Business Information:

Being a publicly listed entity employees may be subject to market sensitive information. Employees are not to disclose any information about the Resimac Group that is not already in the public domain without the proper authority to do so.

There are certain times of the year, which all employees and Directors should not trade in Resimac securities given the heightened risk of actual or perceived insider trading. Employees and Directors are prohibited from engaging in transactions in these “blackout periods” as per the Securities Trading Policy.

Any innovations, proposals, documents or intellectual property that an employee creates during the course of employment by the Resimac Group, are the sole property of the Resimac Group and remain the property of the Resimac Group after termination of employment.

Any data breaches or suspected data breaches are to be reported to Compliance and Enterprise Risk as soon as practicable as per the Data Breach Response Plan and the Incident and Breach Reporting Policy.

Acceptable Use of Company Assets

Employees are to protect company assets and use them in the manner intended. The primary purpose for which the group provides employees access to equipment including company credit cards, computers, mobile devices, email, internet and other technology is to assist them in carrying out their day to day duties.

All company assets are to be used for business purposes in serving the interests of the company, its clients and stakeholders. They are not to be used for your personal benefit, or for the benefit of anyone other than the company.

It is unacceptable for individuals to:

- Use company assets to view, access or distribute explicit material
- Spread discriminatory, harassing or derogatory comments
- Misuse company assets for personal gain or illegal activities
- Reveal to any internal or external person account logins or passwords or allow others to use their account
- Compromise the integrity of the group information systems

Resimac conducts surveillance and monitoring of the group information systems as well as the workplace premises to ensure acceptable use. Employees should not have the expectation of privacy when accessing information systems at the workplace or when using company issued devices.

Whistle-Blower Policy

Resimac Group actively encourages openness, integrity and accountability. The Resimac Group Whistle-blower Policy provides a means by which our employees and contractors can raise concerns regarding actual or suspected contraventions of our ethical and legal standards without fear of reprisal, dismissal or discrimination.

Where to get Further Support

Sometimes there are issues that we face we don't feel can be resolved using the organisational processes outlined in our code. Our Employee Assistance Program (EAP) is a free and confidential service available for all employees and their immediate families, to provide support for work related personal matters.

Our EAP can be contacted 24 hours a day 7 days a week and provides telephone consultations, online information, resources and face to face counselling. *More information about this service is available on the company intranet or you can contact Human Resources.*

Compliance with the Code

You must read understand and comply with the Code. If you have any questions you are responsible for asking your manager for clarification. 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.

Our code outlines examples of misconduct, however it does not cover every situation that may be encountered while working at Resimac. In the absence of specific direction employees are to comply with the relevant laws, policies and the overall spirit of the code.

A Relationship based on trust is important, at Resimac we encourage employees to voice their concerns as well as suspected breaches of the code and company policies without fear of reprisal, disadvantage or discrimination.

Employees have an obligation to report:

- Dishonesty
- Fraudulent or corrupt activities
- Illegal activity
- Breaches of Commonwealth or state legislation or local authority by-laws;
- Unethical behaviour
- Other serious improper conduct;
- An unsafe work practice; or
- Any other conduct which may cause financial or non-financial loss to the Group or be otherwise detrimental to the interests of the Group

The Resimac group will support employees who report violations, however it is a breach of the code for an employee to make a deliberately false claim or report.

Each situation will be assessed based on facts and circumstances, appropriate action will be taken after careful consideration of the matter, this may range from additional training or counselling to (in serious cases) termination of employment as per the “Disciplinary Action Policy”. We will also comply with our obligations to notify the relevant authorities in cases where the law has been broken.

Other Policies Regulating Behaviour

It is a condition of employment that Resimac employees comply with the company’s policies, procedures and rules (present and future). It is the employee’s individual responsibility to know our current policies. Copies of Resimac’s Policies can be found on our company intranet, any updates/additions to policies will be posted on the company intranet or communicated to the group.

Other policies regulating behavior include but are not limited to:

- [Bullying and Harassment Policy](#)
- [Confidentiality and Intellectual Property Policy](#)
- [Conflicts of Interest Policy](#)
- [Disciplinary Action Policy](#)
- [Diversity and Inclusion Policy](#)
- [Dress Code Policy](#)
- [Drug and Alcohol Policy](#)
- [Employee Assistance Program Policy](#)

- [Employee Engagement Policy](#)
- [Equity at Work Policy](#)
- [Leave Policy](#)
- [Manual Handling and Ergonomics Policy](#)
- [Social Media Policy](#)
- [Work Health and Safety Policy](#)
- [Workplace Surveillance Policy](#)
- [Media Policy](#)
- [Conflict of Interest Policy and Procedures](#)

In Summary

If ever in doubt about a course of conduct, ask yourself:

- Is it consistent with the Code?
- Is it ethical?
- Is it legal?
- Will it reflect well on me with Resimac?
- Would I want to read about it in media / on social media?

Resimac Group Policy Declaration

I, _____ fully understand the standards of responsibility and ethical conduct outlined in the code of conduct and related policies which are expected of me when working on behalf of the Resimac Group.

While I am employed at the Resimac group I will ensure at all times to adhere to the standards and policies required.

I am fully aware that my employment may be reviewed and disciplinary action may be taken should I not adhere to these requirements.

Employee Name: _____

Signed: _____

Date: ____/____/____

Document Control

Owner: General Manager – Governance, Change & Culture

Author: Kieren Wellfare

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Applicability Entities: Holding Company, Subsidiaries & Wholly Owned Entities, Referred to in the document as “Resimac Group” / “Resimac”

Review Date	Updated/Reviewed By	Approved By
March 2019	Kieren Wellfare	Name

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