

Code of Conduct

A MESSAGE FROM OUR CEO

At the very heart of Australian Ethical is our purpose – Investing for a better world. This means that as well as delivering great financial outcomes for our stakeholders, we must also understand our impacts on people, on animals and on the world around us.

At AE, we hold ourselves to the highest standards in the way we conduct ourselves and our business operations. Our Code of Conduct sets out expectations for how we work and should be used to guide your actions; and if you see something that isn't right, I encourage you to speak up. We are listening and value what you have to say.

It's our individual and collective actions that will ensure our continued success.

John McMurdo
Chief Executive Officer

HOW THIS CODE APPLIES TO YOU

This Code of Conduct (Code) applies to all Australian Ethical Group (AE) employees, contractors and consultants, and directors (collectively 'employees').

The Code sets out the way employees are expected to always conduct themselves, including when representing or perceived to be representing Australian Ethical.

The Code includes an overview of some of AE's key policies; it is not an exhaustive list of policies and procedures, and employees are required to familiarise themselves and comply with this Code, all group policies and any other policies that may be specific to their role.

It is expected that senior executives and managers lead by example and reinforce this Code and all group policies, and AE's values and behaviours in their interactions with employees on an ongoing basis.

A breach of this Code and supporting policies is considered a serious matter and will be investigated; it may result in consequences that impact performance and reward outcomes and/or result in disciplinary action up to and including dismissal.

All employees have a responsibility to report concerns or possible breaches of the Code.

If you have questions regarding the Code, please contact the Risk & Legal Team.

WHAT WE STAND FOR

Our Purpose – Investing for a Better World, and Our Values, define what we stand for and how we conduct ourselves.

Our values are integral to our culture and guide everything we do.

- Action – We are driven to achieve real change through intentional and meaningful steps.
- Authenticity - We are genuine and true to who we are, creating an environment of trust and acceptance.
- Empathy - We are compassionate and conscious of our impact on the world around us.
- Curiosity - We have a mindset in which we think beyond the present and into the future.
- Connection - We embody a sense of belonging which drives collaboration and team success.

AE is committed to not only complying with its legal obligations but also to acting ethically and responsibly in the conduct of its operations.

OUR EXPECTATIONS OF YOU

At AE everyone is accountable for the way they conduct themselves; it is expected that all employees demonstrate our values through day-to-day interactions with colleagues and clients and meet the conduct expectations set out in our Code and supporting policies.

This will ultimately have a positive impact on our culture and supports the integrity of our business.

Personal and Professional Conduct

You are expected to conduct yourself in a professional manner whether in person, online, or through any other form of communication. This includes acting with integrity, courtesy and respect, and being authentic and accountable. Your actions both inside and outside of the workplace, should reflect positively on AE's reputation as well as yourself.

This includes:

- Taking all reasonable steps to avoid or manage potential and actual **conflicts of interest**. This includes ensuring your personal or any external business interests don't influence and therefore interfere with the integrity of decision making and the exercise of unbiased judgement.
- Understanding and following our employee **personal trading** rules. Not acting on inside information and making sure you get the necessary approvals before trading.
- Exercising caution when **giving or receiving gifts**, benefits and entertainment. Make sure you're across the protocols, including the limits, approvals needed and recording requirements.
- **Protecting our assets**, including intellectual property, business plans, employee information and information that is not generally known to the public. This also means that employees should only use AE property, including information technology resources, for proper purposes.
- When using **social media**, being polite to everyone you interact with – irrespective of their views. Making sure you have the necessary approvals before making public statements and that you respect copyright, privacy, confidentiality, financial disclosure and any other relevant law when you make a post. Also when you're using social media, remind people that your opinions are yours and not those of AE.
- Thinking about what could go wrong and **being accountable** if you make a mistake and taking steps to prevent them from happening again.

>> Learn more about your responsibilities

- Conflicts Management Framework
- Share Trading and Dealing in Australian Ethical Products Policy
- Expense Reimbursement & Credit Cards Policy
- Information Security Policy, and Information Asset Classification Policy
- IT Acceptable Use Policy
- Media, Social Media & Speaking Engagement Policy

At AE, we are committed to fostering an inclusive and equitable culture so our diverse talent can bring their authentic selves to work and ensuring our work practices do not compromise the wellbeing, health and safety of our employees. You are expected to conduct yourself accordingly, this means, we won't tolerate bullying, discrimination, harassment, victimisation, unreasonable or unlawful behaviour, or unsafe work practices.

This includes:

- Showing care for your colleagues and treating each other **fairly and with dignity and respect**.
- **Behaving appropriately** as representatives of AE. This includes understanding that behaviour which may be acceptable to you, may not be acceptable to others.
- **Taking responsibility** for your own health and safety and that of your colleagues. This includes identifying and dealing with hazards and safety incidents and ensuring they are escalated appropriately.
- **Speaking up** about issues, incidents or concerns. You should speak up if you see conduct that you think may be fraudulent, illegal, unethical or improper, or could impact the physical or mental wellbeing of our people.

>> Learn more about your responsibilities

- Workplace Bullying, Discrimination and Harassment Policy
- Diversity, Equity & Inclusion Policy
- Work Health & Safety Policy

Clients and Counterparties

The way in which we engage with our clients and counterparties is critical to our commitment to conducting business ethically and responsibly. You are expected to conduct yourself in a manner that earns and retains the trust of our clients and counterparties.

This includes:

- **Dealing in good faith** with our customers and other stakeholders. This means not taking unfair advantage of anyone through any form of fraud, manipulation, concealment, abuse of privileged information or any other unfair dealing practice.
- Ensuring that our products and services are **fair and transparent** and have our customers' interests front of mind.
- **Keeping personal information secure and protecting the privacy** of our customers, advisers, clients, business partners, suppliers and colleagues. This includes understanding that all personal information should be handled with care, treated as confidential and only used in a manner consistent with the reason why we collected it.
- **Handling complaints**, disputes and other expressions of dissatisfaction fairly, promptly and consistently.
- **Communicating openly and honestly** with stakeholders including media, investors and regulators and ensuring that we **comply with market disclosure obligations**.
- **Assessing, developing and monitoring relationships** with business partners and suppliers. This includes completing appropriate risk assessments, due diligence and approvals.
- Not making or taking of bribes and engaging in corrupt behaviour.
- **Not making political donations** on behalf of AE.

>> Learn more about your responsibilities

- Complaints Handling Policy
- Anti-money Laundering & Counter-terrorism Financing Program
- Fraud, Theft, Bribery and Corruption Control Plan
- Document Retention Policy
- Information Security Policy, and Information Asset Classification Policy

- Outsourcing Policy
- Continuous Disclosure Policy
- Privacy Policy

Speaking Up

We all have a responsibility to speak up when something isn't right, and AE is committed to ensuring that employees will not suffer detriment for raising genuine concerns in relation to improper conduct.

We strongly encourage all employees with a concern to speak up and raise issues so they can be addressed.

There are several ways to do this:

- Speak to your leader or another trusted leader
- Speak directly to a member of the Leadership Team, such as the Chief Risk Officer or Chief People & Culture Officer
- Raise an incident through our Tickit portal
- Speak to the Whistleblower Protection Officer, all whistleblower concerns raised will be taken seriously and investigated. Action will be taken as appropriate and will vary from case to case.

You can also contact our Employee Assistance Program provider who can support you through short-term confidential counselling.

>> Learn more:

- Allos - Employee Assistance Program provider
- Whistleblowing Policy
- Raising an incident in Tickit