

Code of Conduct

Australian Ethical Investment Ltd & Australian Ethical Superannuation Pty Ltd

The Australian Ethical Code of Conduct is intended to provide guidance for Directors and employees on the standards that Australian Ethical expects in the conduct of its operations. The Code has been endorsed by the Board of Directors and applies to all Directors, employees, contractors.

If you are in doubt as to whether anything you are contemplating might breach the Code, apply the following test:

Can this activity be justified in terms of the Australian Ethical Charter?

If there is an activity that we are proposing to undertake that involves no legal impropriety, but which fails this test, then we should not undertake that activity, even if it is not expressly prohibited by this Code.

1. We must be aware of conflicts

There may be times when our personal interests conflict with those of Australian Ethical or our customers. Australian Ethical has a statutory duty to prefer the interests of customers in the event of a conflict. The interests of customers must come first.

If the conflict is between our personal interests and Australian Ethical, we should take action to remove or manage the conflict so as to avoid detriment to Australian Ethical.

Directors, employees and contractors should be familiar with Australian Ethical's Conflicts Management Policy. If you have a conflict, you must disclose that conflict to your Manager and the Risk and Compliance Manager. Together, you, your Manager and the Risk and Compliance Manager are responsible for putting into place measures to remove or manage the conflict. The conflict must also be recorded on the Register of Relevant Duties.

2. We must not participate in insider trading

If you have non-publicly known, price-sensitive information such as information:

- Acquired through working on investments;
- About a proposal;
- About any other entity in which Australian Ethical may have an interest; or
- That has come to your knowledge through your employment with Australian Ethical or any other means.

Then you must not:

- Deal in that entity's investments;
- Pass that information on to another person; or
- Encourage another person (for example, a family member) to make any investments in the entity.

Trading that you undertake (both generally and in Australian Ethical shares) must comply with the procedures set out in the Australian Ethical Share Trading Policy.

3. We must not make unauthorised gains or payments

As a general rule, we should not accept (or offer to give) gifts, services, discounts, gratuities or other gains from (or to) people who conduct business with Australian Ethical.

Directors, employees and contractors receiving gifts or soft dollar benefits from third parties by virtue of their employment or association with Australian Ethical must declare these to the Risk and Compliance Officer. Gifts may be accepted or declined with reference to the procedures outlined in the Australian Ethical Conflicts Management Policy. Accepted gifts must be recorded on the Register of Relevant Interests.

Australian Ethical will not provide gifts or soft dollar benefits to third parties for the referral of customers or for the issue of Australian Ethical products to customers. Australian Ethical may conduct competitions and other promotional activities that involve the granting of nominal rewards to current and/or new customers. Any such promotional activities will be monitored to ensure that they are not being manipulated to achieve outcomes that are inconsistent with this Code and the Australian Ethical Charter.

The offering of bribes to anyone is prohibited. Breaking this principle could compromise all concerned and is illegal.

4. Australian Ethical's assets are critical to our business competitiveness and success

We must only use Australian Ethical assets as authorised.

These assets include office equipment, computer systems, the data on those systems (including the passwords allowing access to that data), intellectual property, brands and corporate charge cards.

Australian Ethical's assets are provided to you for conducting the business of the company. You must use the assets in line with the terms outlined in the Australian Ethical IT Acceptable Use Policy and not use the assets for personal gain or to compete with Australian Ethical.

5. We have an obligation of care and diligence

We need to exercise care and diligence in the performance of our duties. We have a responsibility to our shareholders and unit holders to ensure that our work is accurate, that we attend to detail and that we make decisions based on up to date information.

6. We must align our behaviour to Australian Ethical's values

Directors, employees and contractors are expected to align their behaviour to Australian Ethical's values of Wisdom, Empathy, Authenticity and Action.

7. We must protect confidential and personal information

In the course of performance of our duties, we may have access to confidential information about Australian Ethical, its customers or its shareholders.

It is very important not to use or distribute confidential information unless you have been given permission to do so. This includes not giving confidential information to other employees or teams in Australian Ethical or using confidential information for a different purpose without first obtaining authorisation from the relevant person.

You must comply with the Australian Ethical Privacy Policy when handling personal information and sensitive information.

8. We must ensure everyone has an equal opportunity

Australian Ethical has a long-standing commitment to equal opportunity for all employees.

Discrimination, bullying or harassment of any kind is prohibited and is absolutely inconsistent with our philosophy. This includes ensuring you are polite and respectful to all people you interact with whilst using social media.

9. We must compete fairly

Australian Ethical is committed to fair competition. When competing for business we must do so vigorously but fairly. This means not intentionally misleading customers, business partners, competitors or the community; only using Australian Ethical's reputation in legitimate ways; and refusing to engage in doubtful market practices.

10. We must take into account environment, health and safety impacts before making a business decision

The Australian Ethical Charter outlines the principles used when Australian Ethical makes investment decisions. These principles require us to consider a range of environmental and social criteria.

It is important that, in addition to selecting companies which meet the Charter, Australian Ethical also acts in such a way as to promote the principles we espouse in our everyday business dealings.

Directors, employees and contractors should strive to ensure that our business decisions do not compromise our commitment to avoiding any injury to people or damage to the environment and that we comply at all times with local regulations, where we are unable to exceed them.

11. We must not make unauthorised public statements

Only Directors or employees specifically authorised to do so may make public statements on behalf of Australian Ethical. We must take great care in public speaking engagements, media releases, when using social media and at official appearances. In particular, we must be careful in the following areas:

- *Sensitive information:* Ensure all non-public, price sensitive information concerning Australian Ethical or its businesses is disclosed to the Company Secretary before it is released publicly or widely disseminated. This is particularly important as Australian Ethical must inform the market before briefing media or making any general public announcements. Australian Ethical cannot make selective price sensitive disclosures (such as to analysts or ratings agencies) or preliminary disclosures to the media, even if it is requested that the information be "embargoed" until public release.
- *The public face of Australian Ethical:* Directors, employees and contractors must not make comments that may be construed to be representing the official view of Australian Ethical. Any publicly available information we use (for example, in publications, memos, presentations or releases) must utilise the current form of that information located on our website or in our Product Disclosure Statements or which has otherwise been approved.
- *Social media:* Do not post material that is offensive, obscene, defamatory, threatening, harassing, bullying, discriminatory, hateful, racist, sexist, infringes copyright, or is otherwise unlawful on Australian Ethical's social media sites or on your own personal sites. Do not imply that you are authorised to speak

as a representative of Australian Ethical, nor give the impression that the views you express are those of Australian Ethical, unless you are authorised to do so.

12. We must not make unauthorised political donations on behalf of Australian Ethical

Political donations may only be authorised by the Board.

13. We must be familiar with the policies and procedures that relate to our work

We must make ourselves aware of and understand Australian Ethical's policies and procedures, particularly those that affect us in our roles. We must be clear on our limits of authority and never exceed those limits.

14. We have responsibilities to shareholders and the community

We have a responsibility to our shareholders to deliver shareholder value through:

- The sustainable and efficient operation of Australian Ethical;
- Adoption and implementation of sound risk management processes; and
- Compliance with applicable laws and regulations.

We have a responsibility to the community within which we work. We need to consider the impacts on our local and broader community when making business decisions.

15. Reporting Breaches of the Code

We have a responsibility to report breaches of this Code. Australian Ethical maintains a Whistleblowing Policy that includes procedures for reporting breaches of this Code or concerns about unethical practices.

16. Obligation to Comply with the Code

We should adhere to the Code both in accordance with its terms and spirit.

Breaches of the Code may be subject to disciplinary action, including termination of directorships, employment or contacts.