



---

# The Resimac Way

CODE OF ETHICS

- June 2022 -

# Our Values

## **Quality**

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

## **Passion**

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

## **Respect**

We create an environment of respect for all stakeholders, 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 our people and arm them with the tools to perform.

## **Professionalism & Integrity**

We are committed to a Code of Ethics that promotes professional behaviour driving the business and its people 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 fast-moving changing world; in order to prosper we are open to and embrace change in all aspects of our business.

## Contents

Purpose	4
Scope	4
Person and Professional Behaviour – Your Obligations	4
Conflicts of Interest	5
Prevention of Fraud and Corruption	5
Workplace Health and Safety	6
Data Protection and Confidential Information	6
Acceptable Use of Company Assets	7
Whistleblower Policy	7
Where to get Further Support	7
Compliance with the Code	8
Other Policies Regulating Behaviour	8
Resimac Group Policy Declaration	10
Document Control	11

## Purpose

The Code of Ethics (the Code) sets out clear guidelines and standards for the behaviour and conduct required by 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 subsidiaries and is to be followed by anyone who works for or represents Resimac. This includes employees (full-time, part time, and casual), contractors, consultants and directors.

The Code applies to an employee’s regular workplace (even if not working), to a temporary or alternate workplace (i.e., while working from home), during business related trips, attendance at 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 principles 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, victimisation 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
- 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

- 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 honest and transparent
- Demonstrate and promote a high standard of conduct with respect to honesty, fairness, integrity, diligence and competency.

## **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 may encounter potential conflicts from time to time. 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 - Employees must report to Compliance any perceived, apparent or potential conflict of interest
- managed transparently
- managed in consultation with the employee’s relevant 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. Examples include:

- theft of money, data or property
- deliberately falsifying, concealing or destroying documents
- acts of Bribery – Bribery is a type of corruption involving the giving or receiving of a benefit with the aim of influencing a person’s decision.

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, you have the option to either tell your Manager,

Compliance or the Human Resources department without delay. Please refer to our Whistle Blower Policy and Privacy 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, which includes:

### **Customer Personal and Credit Information**

All personal and credit information is to be accessed for legitimate business purposes; shared only with those who are allowed access and protected in accordance with the relevant data protection polices 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, during 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 their employment by Resimac, are the sole property of Resimac and remain the property of Resimac 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.

## Hardship Requests

If an employee becomes aware, or is advised by a Customer, that the Customer is or may be in financial difficulties, the employee will consider in good faith whether it is reasonably appropriate to vary the repayment terms of the credit facility.

All hardship requests must be managed in accordance with our regulatory requirements and our internal policies. Refer to our *Credit Risk Management Procedures and Underwriting Guidelines (sections 5.4, 5.5, 5.6) on the intranet*.

An employee must provide information about our hardship policy to a Customer on request.

## 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 sexually 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.

## Whistleblower Policy

Resimac actively encourages openness, integrity and accountability. The Resimac Whistleblower 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 personal and/or work-related issues.

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.

Resimac 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 which 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 behaviour include but are not limited to:

- Anti-Bribery and Corruption Policy
- Bullying and Harassment Policy
- Confidentiality and Intellectual Property Policy
- Conflicts of Interest Policy
- Credit Risk Management Procedures and Underwriting Guidelines
- Disciplinary Action Policy
- Diversity, Equity and Inclusion Policy
- Employee Engagement Policy
- Equity at Work Policy
- Leave Policy
- Manual Handling and Ergonomics Policy
- Media Policy
- Privacy Policy
- Social Media Policy
- Vulnerable Customers Policy
- Work Health and Safety Policy
- Working from Home Policy
- Workplace Surveillance Policy

## Resimac Group Policy Declaration

I, \_\_\_\_\_ fully understand the standards of responsibility and ethical conduct outlined in the Code of Ethics and related policies which are expected of me when working on behalf of Resimac.

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

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

Employee Name: \_\_\_\_\_

Signed: \_\_\_\_\_

Date: \_\_\_/\_\_\_/\_\_\_\_

## Document Control

**Owner:** Chief Operating Officer

**Author:** Original Author Kieren Wellfare and endorsed by the Board in 2020

**Review:** This document is to be reviewed every 2 years (unless required before) – Next review date: May 2024

Review Date	Updated/Reviewed By	Approved By
May 2022	Danielle Corcoran and Liza Jones	Board

## Applicability

**Entities:** Holding Company, subsidiaries and wholly owned entities, referred to in the document as ‘Resimac Group’/’Resimac’.

## Commercial in Confidence

The information contained in this document is confidential and proprietary to Resimac Group Limited (“Resimac”). It must be held in strict confidence and not disclosed, duplicated or used in whole or in part for any purpose without the written consent of Resimac. Every attempt has been made to ensure the information contained herein has been obtained from reliable sources. Resimac does not guarantee the accuracy or completeness of the information presented and accepts no liability for any loss or damage arising in connection with the use of the information.