



Code of Ethical Conduct

Principles, Rules and Guidance

1. The purpose of this Code of Ethical Conduct is to specify enforceable rules and provide guidance on standards of ethical conduct for staff members of Euroz Hartleys Group Limited (**Euroz Hartleys Group**). The code includes ethical principles as well as addresses industry specific issues. It should be interpreted broadly, rather than by narrow and strict interpretation.
2. A fundamental goal of Euroz Hartleys is to contribute to the social good through the lawful trading of securities and other Financial Products in the Financial Services Industry.
3. The objective of the code is to maintain and improve ethical behaviour within Euroz Hartleys Group and the securities profession that Euroz Hartleys Group operates and services its' clients. The code applies to all members of the Euroz Hartleys Group of Companies (Euroz Hartleys Limited and Westoz Funds Management Pty Ltd).
4. The code is administered by the Head of Risk. The code is developed in consultation with the Euroz Hartleys Limited Board of Directors. The administration and effectiveness of the code is monitored and reported. The code is reviewed to ensure it remains effective and deals with current issues.
5. Breaches of the code will be dealt with by the Board of Directors in consultation with the Euroz Hartleys Limited Compliance and Risk Management Committee. It is intended that the complaints and disciplinary system is accessible, independent, reasonable, fair, effective and accountable. A breach of the code includes non-compliance with the code's rules and guidance, and for unsatisfactory professional conduct and professional misconduct not specified in the code.
6. "Unsatisfactory professional conduct" includes conduct of a Euroz Hartleys staff member in the performance of their professional duties that is not of the standard and diligence that a member of the public is entitled to expect of a Euroz Hartleys staff member.
7. "Professional misconduct" includes unsatisfactory professional conduct that involves a substantial or consistent failure to reach or maintain a reasonable standard of competence and diligence, and conduct justifying a finding that the staff member is not a fit and proper person to perform the position they are currently employed to perform.
8. Unsatisfactory professional conduct and professional misconduct may include for example but is not limited to contravention of laws, and regulatory and self-regulatory requirements governing the conduct of the profession, charging unfair fees and costs, gross negligence, conduct in connection with a criminal offence, tax offences, dishonesty, insolvency,



disqualification as a director or officer of a company and contravention of professional indemnity and continuing professional development requirements.

9. Feedback about the code or ethical conduct issues can be made to compliancedept@eurozhartleys.com or the Head of Risk directly. A complaint about a breach of the code by a Euroz Hartleys staff member can be made to compliancedept@eurozhartleys.com, your department head or the Head of Risk.

Obey the law

10. The first priority of staff members is to obey the law and comply with the Euroz Hartleys Code of Ethical Conduct.
11. Staff Members must obey the just and reasonable laws of the community, including legislation, statutory rules, and regulatory and self-regulatory requirements governing the conduct of the Financial Services and Stockbroking industry.

Public Interest, honesty and integrity

12. Staff members must act in the interests of their clients, employers and the public. Members must be honest and otherwise not engage in conduct that would bring Euroz Hartleys or the Financial Services / Stockbroking industry into disrepute. Staff members must be unbiased in the services they provide and in their conduct with clients, employers, peers and employees.

Personal responsibility

13. Staff members must comply with the standards of the profession notwithstanding pressure from clients, employers, peers, employees or others to compromise those standards. Staff members are personally responsible and accountable for their conduct, must allow and exercise individual autonomy such as freedom of speech, and must not discriminate against any person because of gender, race, or religion.
14. Staff members should disclose to their employer the Staff members' obligations under the code where the employer requires conduct that is inconsistent with the code of ethical conduct. Staff members must obey the lawful directions of their employer.

Respect the rights of clients

15. Staff members must provide adequate information to clients that will enable the client to give informed consent in relation to the work to be undertaken and the fees and payments to be charged. Staff members must respect a client's right to privacy and confidentiality and comply with the law in relation to those rights (such as privacy laws).
16. A Staff member who engages in unsolicited contact must ensure that the client knows the identity of the person making the approach.



Competency

17. Staff members must take reasonable action to ensure that they have sufficient knowledge of securities and practice, relevant legal requirements, the code and market rules (including customs and usages) to properly undertake their business activities.
18. Staff members must be competent, conscientious, efficient and effective in their work. Staff members must maintain their competency through continuing professional development (where applicable) and only undertake work in which they are competent.
19. Staff members must not without merit represent that they are competent.
20. Principal staff members must take all reasonable action to ensure that their staff are competent and that their conduct as employees is consistent with the code. Principal Staff members must provide staff with information, training and supervisions that enables them to competently do their work and comply with the law in the performance of their profession.

Fair trading

21. Staff members must compete fairly in the market, including not taking unfair advantage of other Staff members and not engaging in anti-competitive or unconscionable conduct. Staff members must not knowingly engage or induce another person to engage in conduct that is likely to mislead or deceive in the performance of their profession.

Conflict of interest

22. Principal Staff members must minimise the potential adverse impact of conflicts of interest on clients by having adequate arrangements for controlling conflicts of interest in relation to the activities of the firm for identifying, managing, avoiding and disclosing conflicts of interest.
23. Staff members must avoid and disclose conflicts of interest where reasonably practicable before or when the service is provided. When making a disclosure, the member should reasonably ensure that the client is adequately informed about the conflict of interest. Disclosure should not reveal "inside information" or other commercially sensitive or confidential information.

Co-operation, support and whistleblowing

24. Staff members must cooperate to serve the objectives of the code. Staff members must ensure all reports and returns required by Euroz Hartleys are produced accurately, honestly and when required, and that the reports and returns are true and correct.
25. Staff members, when they know of illegal conduct must report that conduct to their Department Head, the Head of Risk or a Director of the Board in accordance with the law.



26. Staff members must not discriminate or take other adverse action against a person who discloses illegal conduct or a breach of the code.

Entertainment and Gifts

27. Staff members must not offer or seek inducements for business. However, infrequent and low value gifts and entertainment may be offered or accepted where inducement is not intended or unlikely to be perceived to be an inducement. The member should notify their employer of gifts and entertainment.

Money laundering and terrorist financing

28. Staff members must comply with the lawful policies and procedures of the AML/CTF Act.

Dealing with unidentified/unnamed principals

29. Staff members should not trade unless the identity of the client is known. The information must only be used for risk management and other legitimate purposes, including for preventing money laundering, fraud and other illegal activity.

Consumer disputes

30. Staff members must handle client complaints in accordance with the Euroz Hartleys Dispute Resolution procedure.