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MyStateLimited 

Code of Conduct

Policy



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Message from **Melos**



Hi team,

At MyState, our vision is to help people achieve their dreams. We achieve this through our mission of creating simple and trustworthy digital experiences for our customers. Being simple and trustworthy has never been so important.

We are wholeheartedly committed to being evermore trustworthy in the eyes of our customers, and making improvements every day that help us to step up and meet the needs of our customers now and into the future.

Our Code of Conduct applies to all employees, Directors, officers and contractors of MyState Limited. The Code is key to setting the standard so that the MyState Group and all of our people are providing fair outcomes in our dealings with each other, our customers, our communities and our shareholders. It provides us all with a common set of rules and boundaries for how we will behave, and provides us with guidelines to navigate through challenging circumstances.

The Code is critical for our business and we all have a responsibility to familiarise ourselves with this document, and to understand what is expected of us as employees.

Team, we come to work every single day to create customer 'wow' and to do the right thing by each

“Being simple and trustworthy has never been so important.”

other, and our customers. This means that we walk in our customers' shoes and appreciate their perspectives and we always think and act in their best interest. It also means we are clear, concise and trustworthy and we design and deliver exceptional customer experiences, always with a human touch. Everything we do, every day should reflect this commitment.

General David Morrison famously said that “the standard you walk past is the standard you accept”. Together we must make a commitment to uphold the standards set in this Code, and to never walk past behaviour that does not align with our values and our Code of Conduct.

Best regards,

Melos Sulichich



Purpose

Our Code of Conduct applies to all employees, Directors, officers and contractors of MyState Limited (MYS) and its subsidiary companies (the Group).

The MYS Code of Conduct describes the standards of behaviour that are expected of every one of us, including our peers, leaders, Board Directors and contractors. We must all consistently meet the standards outlined in the Code that shape how we behave both at work and externally as representatives of the MyState Group.

We are all responsible for adhering to the Code, the law and all MyState Group policies and procedures.

We are all responsible for speaking up and reporting breaches of the Code, the law or of the MyState Group policies and procedures.

Non-compliance with the Code of Conduct will be investigated and may result in disciplinary action, up to and including termination of employment.

Our purpose and mission are an expression of our aspirations for our customers, and our values articulate the behaviours we require from each other.

Our Purpose

Is to help people achieve their dreams

Our Mission

Is to create simple and trustworthy digital experiences for our customers

Our Values





Create customer 'wow'

We walk in our customers' shoes and appreciate their perspectives.

We think and act in the best interest of our customers.

We are clear, concise and trustworthy in our customer interactions.

We design and deliver exceptional customer experiences, with a human touch.

We make things simpler and easier for our customers.



Chase the better

We are bold in our ambition.

We seek out and embrace the change that is required to succeed.

We have the courage to try new things and grow from our failures.

We simplify (and digitise) to deliver faster.

We seek industry leading productivity and always drive for better outcomes.



Collaborate to win

We care for each other, our customers, partners and community.

We give our best, do the right thing, and trust our colleagues to do the same.

We hold each other to account.

We openly share information so that everyone can make informed decisions.

We reach out across teams to rapidly solve problems – and celebrate our successes and learnings!

Principles





Promoting and valuing diversity

We have made a commitment to create a workplace that is fair, values difference and promotes a sense of belonging. At MyState, this means that people of different ages, cultural backgrounds, religions, physical abilities, career stages, sexual orientations, and genders feel they belong as they go about interacting with customers, suppliers and each other. We treat everyone with respect, value difference and maintain a safe working environment. Unlawful discrimination, harassment of any kind, bullying or victimisation or other unacceptable or offensive conduct will not be tolerated.

Honesty, integrity and respect

We must:

- be honest in all dealings and conduct ourselves with integrity;
- adhere to the truth and not knowingly make false statements, or mislead directly, indirectly, or by omission;
- treat everyone including customers, suppliers, shareholders and colleagues with fairness and respect;
- undertake our duties with care and diligence;
- be accountable for our actions;
- acknowledge and, wherever possible, promptly rectify our mistakes;
- act within the authority and delegation of our position;
- represent the Group in a professional manner whenever you are identified as a representative of MyState. This includes when you are outside your workplace or working hours, for example at work functions, outside hours or work activities or when you are representing MyState in the community; and
- not remove any Group assets (including physical assets, data, information and any other intellectual property) without proper authorisation, or use for personal benefit or any improper use.

At MyState, this means that

people of different ages, cultural backgrounds, religions, physical abilities, career stages, sexual orientations, and genders feel they belong as they go about interacting with customers, suppliers and each other.

Managing and declaring conflicts of interest

A conflict of interest arises where your private interests are, or may be, in conflict with the interests of the Group. A conflict of interest can be actual, potential or perceived. Perceived conflicts can be as damaging to the Group's reputation as an actual conflict. A conflict may be financial or personal and can extend to the interest of your family and friends.

Actual, potential or perceived conflict of interest may also arise when any of the Group's entities interact with each other including where regulatory independence obligations must be maintained. Intra Group entity conflicts of interest are managed in accordance with the Conflict of Interest Management Standard.

You must take reasonable action to recognise and immediately disclose to your manager any conflict of interest that cannot be avoided.

To prevent your personal interests conflicting with your duty to the Group:

- do not participate in any activity or enter into any arrangement, or accept any employment with another business, outside your employment with the Group that could have an adverse impact on your ability to carry out your responsibilities and duties to the Group, or cause a conflict of interest, or conflict with the Group's corporate image or business activities;
- do not accept, offer or promise a bribe or unlawful inducement to anyone;

- act in accordance with the Group's Conduct Risk Framework; and
- never use information gained from your employment with the Group for your own gain or for the benefit of any family members or associates.

A conflict of interest may arise if you hold a financial or other interest in an organisation, which may affect the interests of the Group:

- you engage in any activity (paid or unpaid), which could have an adverse impact on the Group's activities or could interfere with your performance; and
- as a result of your employment with the Group, you or your associate(s) could secure some personal advantage (other than salary).

Examples could include approving a loan or awarding a contract for the supply of goods and services to a family member or friend.

Conflict of interest in close personal relationships

You must understand and comply with your personal obligation to prevent detriment to the Group or its stakeholders including taking steps to prevent personal relationships giving rise to a conflict of interest of perceived conflict of interest.

Never provide or maintain products or services for, or complete or approve transactions on behalf of immediate family members or relatives in the course of your work.

Disclose to your line manager any personal associations with a third party if you are involved in evaluating or negotiation with for MyState, whether for employment, as a customer or supplier, or for any other reason.

Personal relationships

Personal relationships can include:

- family relationships – spouses, de facto spouses, children and close relatives;
- close friendships;
- sexual relationships; or
- relationships where there have been previous instances of conflict between the parties.

Where conflicts of interest may arise in employment

A close personal relationship between employees can affect the decision making process in areas such as:

- recruitment, selection, appointment, continuing appointment of employees;
- conditions of employment, promotion, reclassification;
- termination;
- provision of opportunities and resource allocation;
- referee reports, performance appraisals;
- tendering process and contract arrangements; and
- authorisation of payment/funds.

In many cases, only the individual employee will be aware of the potential for a conflict of interest arising from a close personal relationship. The onus is on the employee:

- to decline participating in situations where there is a conflict of interest and where their normal duties require such participation;
- to declare that conflict to People and Culture or the relevant General Manager; and
- to explain why they cannot undertake those normal duties.

If participation in a decision-making process cannot be avoided where there is the potential for a conflict of interest arising from a close personal relationship, this matter must be discussed with People and Culture or the relevant General Manager, to enable appropriate alternative arrangements to safeguard the interests of all parties and to avoid the conflict of interest arising.

Disclosure of close personal relationships

In many cases, only the employee will be aware of the potential for conflict of interest. Therefore, the onus is on that person to notify People and Culture or the relevant General Manager, if a potential or actual conflict of interest arises.

If an employee participates in the decision-making process and fails to disclose a conflict of interest in a close personal relationship, the process can

be compromised, with the possibility of disciplinary proceedings being invoked against the employee.

Disclosure of other employment

You must not directly or indirectly be engaged by, or concerned or interested, either alone or jointly with an employee, servant or agent or any other person, in any other business or occupation or hold office as a director or any other company without the prior written consent of your Manager.

You are not prevented from holding shares in a private family investment company or investments in any company of which any shares or loan capital are quoted or dealt with on any recognised stock exchange in Australia or elsewhere; or holding office as a director of a private family investment company, or Trustee of a Self-Managed Super Fund.

You have an obligation to disclose

You are to make written disclosures of personal and financial interests on appointment and to update the disclosure as circumstances change.

Any outside employment or directorships must be disclosed to People and Culture in the first instance for review.

Disclosure of gifts and hospitality

Receiving gifts

- Do not accept gifts or benefits unless the gift is of little financial value (less than \$100) and there is no reasonable possibility that it could cause a real or apparent conflict of interest. Examples of this include minor thank you gifts;
- Gifts of money (or equivalent such as a gift voucher) must not be accepted under any circumstance. If such a gift is received it should be promptly returned to the provider with appropriate correspondence explaining the Group's policy of non-acceptance of such gifts;
- Gifts valued in excess of \$100 should be promptly returned to the provider. If it is not practical to return the gift, if the item is perishable or the cost to return exceeds the value of the gift, then, with the approval of the relevant Executive, the item should be:
 - donated to charity;

- internally raffled with the proceeds to be donated to charity; or

- retained for common use if deemed inappropriate for a charitable donation.

In all such instances appropriate correspondence explaining the Group's policy of non-acceptance of such gifts must be sent to the provider for future reference and to advise how the gift has been treated.

- In all instances where a gift has been received, the Company Secretary must be notified of the receipt of a gift, via the relevant Executive, for inclusion in the Gifts and Hospitality Register. The advice must include the following details:
 - the date of receipt of the gift;
 - the particulars of the gift;
 - the name of the provider of the gift;
 - the name of the recipient of the gift;
 - the value of the gift; and
 - the subsequent treatment of the gift.

Receiving hospitality

Hospitality refers to attendance by staff at an event which is paid for by an external party which has, or seeks to have, a commercial relationship with the organisation and may include an invitation of travel, accommodation, food, alcohol and entry/participation.

- Staff who attend events representing the Group are required to behave in accordance with this Code of Conduct.
- Staff must not accept any form of hospitality from a current or potential supplier if the services or products supplied are subject to an incomplete internal review or tender process.
- Approval requirements for invitations of hospitality are as follows:
 - Hospitality valued at \$100 or less per attendee may be accepted and does not require entry into the Gifts and Hospitality Register.
 - Hospitality valued greater than \$100 and less than \$250 per attendee may be

accepted subject to approval by the "one up" Manager and advice of the approval must be provided to the Company Secretary for inclusion in the Gifts and Hospitality Register. The advice must include the following details:

- » the date of receipt of the invitation;
 - » the particulars of the event;
 - » the name of the provider of the invitation;
 - » the name of the recipient(s) of the invitation;
 - » the value of the event per attendee (if ascertainable); and
 - » the date of the event.
- Hospitality valued greater than \$250 per attendee may be accepted subject to approval by the relevant Executive and advice of the approval must be provided to the Company Secretary for inclusion in the Gifts and Hospitality Register in accordance with the above requirements.

Providing gifts or hospitality

These provisions apply to gifting or the offering of hospitality to parties external to the Group, however they exclude duly authorised marketing and promotional events conducted by the Group.

- No staff member is permitted to gift money (or equivalent such as a gift voucher) under any circumstance.
- Gifting of Group property by staff must be approved by the relevant Executive and can only be approved if the property was acquired or produced to use as a gift.
- It is considered acceptable for staff to offer hospitality to individuals while travelling, particularly in cases where the individual has provided his/her time to the Group for no fee. Hospitality incurred in this regard is subject to the relevant budgetary approval process and does not need to be recorded in the Gifts and Hospitality Register.

- Gifts or hospitality provided must be recorded in the gift register following the same principles that apply when a gift or hospitality is received.

Respecting confidentiality and privacy

All employees will respect the privacy of each other, Group companies and our customers. Employees are required to:

- only access information about customers personal financial affairs (access accounts or facilities) where authorised by the customer, or where access is reasonably expected to occur as part of the employee's regular duties;
- maintain the confidentiality of all information acquired in the course of performing their duties; and
- not make improper use of, or improperly disclose, confidential information to third parties.

These obligations of confidentiality continue after the employee leaves the employment of the Group, unless otherwise required by legislation or regulation.

Compliance with laws, regulations, policies, standards and procedures

The Group requires employees to:

- perform their job and comply with both the letter and the spirit of all laws, rules and regulations that apply to the Group in the conduct of its business and affairs;
- follow all directions issued in accordance with the Group's policies and procedures;
- provide full, accurate and timely disclosure of information as appropriate to management, the Board and regulators;
- not take any action or make any omission that will breach any law or regulation;
- immediately report breaches of any law, regulation, Group policy or procedure; and
- complete the required compliance related training.



Acts of dishonesty

Acts that are considered to be dishonest or fraudulent and are therefore unethical include but are not limited to:

- manipulation of loan accounts, documents, computer records or customer accounts;
- theft of any kind including theft of cheques, passbooks or stealing from customers' accounts, overpayment of interest, and creating fictitious loans, or data theft including but not limited to the theft of customer information;
- holding back on deposits or receipts belonging to the Group or diverting deposits or receipts for unauthorised use whether such use is permanent or temporary;
- cheque floating or kiting;
- forgeries;
- unauthorised or unapproved salary advances or overtime reimbursement,
- colluding with others, within or outside the Group, to gain a financial benefit e.g. colluding with suppliers to overcharge the business;
- employee's expense, credit card or fuel card record falsification or fraud;
- intentional violation of Group rules, internal controls, regulations or procedures including performing any operation on your own account;
- intentionally failing to secure collateral, or to properly record Group interest in collateral;

- granting or requesting preferential treatment for anyone; and
- providing false or misleading information in applying for positions within the Group and giving incorrect or misleading information during employment e.g. non-disclosure of true financial situation when applying for account concessions etc.

Engaging in acts of dishonesty is unacceptable under any circumstances and may result in termination of your employment.

You are expected to conduct your personal financial affairs in an exemplary manner. In particular, the mismanagement of personal financial affairs leading to Part IX proceedings under the Bankruptcy Act 1966 or a full application for bankruptcy is deemed to be a potentially serious breach of the Code of Conduct.

If you are experiencing any financial or personal difficulties that may result in non-compliance of the Code of Conduct, you should speak with your Manager or a member of the People and Culture team, who will assist and provide access to suitable resources. The Employee Assistance Provider (EAP) is available to provide confidential counselling support.



Additional expectations of leaders

Our leaders help us all to uphold the highest standards and consistently live our values.

If you manage, supervise, direct or oversee the work of others we expect you to:

- **be a role model** for the high standards, outcomes and values we expect;
- **embed the Code** into both operational and people management processes you use in your team and regularly ensure that execution is in line with our Risk Management Framework;
- **promote risk awareness** and speaking up and build constructive relationships across the Group;
- **set clear expectations** for your team;
- **encourage and strengthen** self-reflection by taking the time to consider the impact of decisions, learn from mistakes and empower others to do the same;
- **know and meet your accountability obligations** under any relevant laws or regulations, including any additional responsibility you may have to support your own and the Group's compliance, such as being an Accountable Person, Responsible Manager or Line Manager.

Code of Conduct monitoring and breaches

Monitoring compliance with this Code of Conduct will be the responsibility of all Managers within the business.

An alleged breach of this Code of Conduct must be reported to the Chief Risk Officer.

The Chief Risk Officer or delegate will be responsible for the oversight of all Code of Conduct related investigations. Investigations will be handled confidentially and with due regard to the principles of procedural fairness and the Group's legal obligations.

The relevant General Manager will be provided with a report detailing the findings from the investigation and will be responsible for determining the appropriate action with advice from the General Manager People and Culture.

The General Manager People and Culture has responsibility for coordinating and oversight of all processes resulting from the outcome of an investigation. The Company Secretary may delegate to the Chief Risk Officer, relevant General Manager or General Manager People and Culture where there is a conflict or to resolve operational constraints.

At the discretion of the Managing Director, General Manager People and Culture and/or the Board, if you are in breach of the Code of Conduct disciplinary action up to and including termination of employment may apply.

The Company Secretary may address matters of appeal.

The Chief Risk Officer shall report material breaches of the Code of Conduct to the Board as soon as practicable but no later than the next scheduled Board meeting or Group Risk Committee meeting, whichever occurs first.

Reporting unethical conduct

You are strongly encouraged to report any breach of the Code of Conduct to your Manager or People and Culture.

You will not be victimised or discriminated against in any way for reporting alleged breaches of the Code.

MYS Whistleblower Protection Policy

Outlines our approach to the protection of Whistleblowers in accordance with our obligations.

MyStateLimited 

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