

Code of Conduct

July 2023



NAVALO
Financial Services Group

1. Scope

- 1.1 This Code of Conduct applies to all personnel of Navalo Financial Services Group Limited ('Navalo' or 'Company') and all personnel working within the Navalo group of companies ('Navalo Group'). This includes directors, officers, employees, consultants, contractors (or their nominated persons) and representatives of Navalo and the Navalo Group and any brands operated by Navalo and the Navalo Group from time to time.
- 1.2 It aims to ensure that all Navalo and Navalo Group personnel understand their responsibilities as representatives of both the Navalo and the Navalo Group brands and the basic rules regarding the way they are required to behave in the workplace.
- 1.3 This Code of Conduct applies to all Navalo and Navalo Group personnel in the course of their work.
- 1.4 All Navalo Group workplace policies and procedures applicable to Navalo Group personnel are incorporated into, and form part of, this Navalo Code of Conduct, and Navalo personnel adherence to such policies and procedures is required under the terms of this Code of Conduct.

2. Behavioural Standards – General

- 2.1 It is essential that all personnel always behave in a manner which upholds Navalo's legal obligations, good reputation and commercial standing and that of all brands operated under the Navalo Group.
- 2.2 All personnel are required to act with respect and honesty when at work and when representing the Navalo and Navalo Group brands outside of working hours.
- 2.3 All personnel are required to work in a manner that is consistent with this Code of Conduct when performing their work duties on or off site, on social media, when interacting with customers and suppliers, or at other Navalo functions (for instance, the Christmas party and any other social function arranged by Navalo or where they attend a function on behalf of Navalo).
- 2.4 In the course of their work, all personnel must speak to colleagues, clients, and members of the public in a courteous, polite and respectful manner.
- 2.5 Specifically, all personnel must ensure that they:
 - (a) carry out their duties to the best of their abilities and within the scope of their authority;
 - (b) do not attend work while under the influence of alcohol or drugs (whether illicit or prescription);
 - (c) complete any training relevant to their role and seek advice from their Manager when unclear about what appropriate action is required;
 - (d) comply with Navalo's and members of the Navalo Group's policies and procedures and reasonable and lawful directions at all times;

- (e) do not engage in behaviour, or ignore behaviour by others, that breaches this Code of Conduct, or other Navalo or Navalo Group policy;
- (f) promptly raise issues or suspected Code of Conduct or Navalo policy breaches with their Manager;
- (g) treat others including, but not limited to, colleagues, joint venture partners, suppliers, customers, and shareholders, with courtesy and respect;
- (h) ensure that personal electronic devices (including but not limited to mobile phones, smart phones, iPods and iPads) are not used for personal matters in client facing environments or when undertaking activities that may harm them, their colleagues, or Navalo's clients';
- (i) inform their Manager immediately if they receive a gift from a client. As a general rule, gifts or gratuities must not be accepted: see Navalo's Anti-Bribery and Corruption Policy. However, the Company understands that small tokens may be exchanged on special occasions (such as Christmas). Gifts can be accepted, provided they do not exceed AUD \$200.00 in value or result in personal gain for the recipient or favourable treatment for the giver if they are someone from whom the Company buys, sells or receives goods and services;
- (j) do not share any Company confidential information to which they have access to, with any person who is not authorised to see that confidential information;
- (k) protect and maintain Company assets according to the relevant policies and procedures and not use them for personal gain;
- (l) keep up to date and comply with all regulatory and other legal obligations of Navalo as its representative.

3. Occupational Violence

- 3.1 Occupational violence will not be tolerated.
- 3.2 Occupational violence and aggression occurs when a person is abused, threatened or assaulted in a situation related to their work. Examples of occupational violence include yelling, swearing and name calling, standing over someone, biting, spitting, scratching, hitting, kicking; pushing, shoving, tripping, grabbing; throwing objects; verbal threats; threatening someone with a weapon, sexual assault.

4. Equal Opportunity

- 4.1 Navalo is an equal opportunity employer. This means that employment and promotion decisions will be made based on an individual's ability, performance, experience and business requirements, regardless of the individual's personal attributes.

- 4.2 Discriminatory conduct will not be tolerated. Refer to Navalo’s Discrimination, Harassment and Bullying Policy.

5. Conflict of Interest

- 5.1 All personnel must, without exception, fully and promptly disclose to Navalo any private or other business interests or involvement which may lead to a potential, perceived, or actual conflict of interest.
- 5.2 Where unsure of whether a private or other business interest or involvement constitutes a conflict of interest, you must contact Navalo’s General Counsel to discuss whether a conflict of interest arises in the circumstances.
- 5.3 Examples of a conflict of interest may include, but are not limited to:
- (a) using your position with Navalo to your personal advantage;
 - (b) engaging in activities that will bring direct or indirect profit to a competitor of Navalo;
 - (c) owning shares of a competitor’s stock;
 - (d) using connections obtained through Navalo for your own private purposes;
 - (e) using company equipment or means to support an external business; or
 - (f) acting in ways or making decisions that may compromise Navalo’s legality (e.g. taking bribes or bribing representatives of legal authorities).
- 5.4 Where you become aware of a conflict of interest arising involving a third party, a Navalo or Navalo Group Director or member of the executive leadership team, you should contact the Navalo General Counsel as soon as possible and without delay.
- 5.5 Where the potential conflict involves another employee, contractor or volunteer of Navalo, you should contact your line Manager in the first instance (or a more senior Manager if the potential conflict relates to your line Manager). The Manager will discuss your concerns with you and direct you as to the most appropriate course of action which may require further consultation with other Managers or the Navalo General Counsel as appropriate.

6. Compliance with Laws and Regulations

- 6.1 All personnel must comply with all applicable laws and regulations at all times, including all foreign laws and regulations that may apply to work or activities conducted outside of Australia.
- 6.2 Each member of the leadership team must be aware of, and familiar with, all laws and regulations that are relevant to their area of responsibility.

- 6.3 If you are unsure about any law or regulation that is relevant to your work, you must contact the Navalo General Counsel.

7. Financial Integrity

- 7.1 All personnel must comply with Navalo's financial and accounting procedures at all times.
- 7.2 Navalo's funds must only be used for appropriate business purposes.
- 7.3 Insofar as is relevant to your role, all personnel must ensure that Navalo's financial records are accurate and that no payment is made on behalf of Navalo without prior written approval in accordance with the prevailing delegated authorities approved by the Navalo CEO or other authorised delegate.

8. Absenteeism/Tardiness

- 8.1 All personnel must report and be prepared to work at set times, as outlined in their letter of offer, employment contract, or services agreement. Where a need arises to arrive late or to leave early, this should be discussed with the relevant Manager.
- 8.2 Regardless of the reason, repeated absenteeism (failing to report for work without prior approval of the relevant Manager) and tardiness (arriving late for work, returning late from breaks/meals, or leaving work early without prior approval) may result in disciplinary action being taken by Navalo. For employees, such disciplinary action may include summary dismissal from employment.

9. Abandonment of Employment

Any employee who is absent from work for a continuous period of three (3) working days or more, without Navalo's consent and without notification to Navalo (taken to be provided when the relevant employee provides notice to and receives consent from their relevant Manager), will be taken to have abandoned their employment. In this instance, the employment relationship will end effective immediately unless otherwise agreed by the parties.

10. Work, Health and Safety

All personnel must comply with Navalo's Work, Health and Safety Policy.

11. Dress Code

Navalo's public branding (including all brands owned and operated by the Navalo Group from time to time) requires that all of its representatives are dressed appropriately. All personnel must be suitably attired and groomed during working hours or when representing Navalo or the Navalo Group brands.

12. Valuables

All personnel should avoid bringing valuables to work. Navalo does not take responsibility and is not liable for any loss or damage to personal items.

13. No Smoking

Smoking is strictly prohibited at all times on all Navalo premises, including all offices, vehicles and outside areas which are the property of Navalo.

Smoke breaks are not permitted during the workday. Personnel who work on site are permitted to take a smoke break as part of their scheduled rest or lunch breaks.

Personnel who wish to modify their smoking habits or quit smoking to comply with this Code are encouraged to call Quitline on 13 7848. Upon application, Navalo will endeavour to confidentially assist anyone who finds adapting to the working conditions provided under this Code difficult.

14. Personal Records

- 14.1 Personnel may be required to provide personal information to Navalo. Personnel must let their Manager know if there are any changes to their personal and/or emergency contact information. Navalo should always know your current home address and phone number, next of kin, and whom to contact in an emergency.
- 14.2 Personal records will be retained in accordance with our legal obligations under applicable privacy law (noting the employee records exemption).

15. Leaving the Company – Employee

- 15.1 At the end of employment, or sooner if required by Navalo, all employees are required to return (without making any copies) any keys, documents, confidential information, records, programmes, any code within any application, client lists, manuals, computers, software, discs or any other Company and/or Navalo Group member (as applicable) property in their possession or control, including any copies.
- 15.2 Navalo is not obliged to provide a written reference to the employee on their departure, however may do so on request.

16. Breach of Code of Conduct

- 16.1 All suspected breaches of this Code of Conduct will be investigated in accordance with applicable laws and standards and prevailing Company policies.
- 16.2 Substantiated breaches of this Code of Conduct may result in disciplinary action up to and including the summary termination of your employment, or by Navalo immediately ending its business relationship with you..