

EQT GROUP CODE OF CONDUCT AND ETHICS



Policy Level: Level 1

Policy Owner: Managing Director

Approval Date: 14 July 2021

Effective Date: 1 August 2021



CONTENTS

CONTENTS	2
STATEMENT OF POLICY	3
COMMITMENT	3
PURPOSE	3
APPLICATION	3
REVIEW	3
BREACHES	3
POLICY PRINCIPLES	4
OUR SUCCESS DEPENDS ON THE TRUST OF OUR CLIENTS	4
WE BEHAVE TO THE HIGHEST STANDARDS WITHOUT EXCEPTION	4
WE TREAT EVERYONE WITH DIGNITY AND RESPECT	4
WE COMPLY WITH ALL LEGAL, REGULATORY AND FIDUCIARY REQUIREMENTS, AS WELL AS INTERNAL POLICIES AND STANDARDS	5
VALUES	5
TRUSTED	5
ACCOUNTABLE	5
EMPOWERING	5
CONSIDER YOUR ACTIONS AND ASK FOR GUIDANCE	5
WHERE TO GET HELP?	5
ACCOUNTABILITIES	6
DIRECTORS	6
MANAGEMENT	6
EMPLOYEES AND CONTRACTORS	6
WHISTLEBLOWER	6
POLICY ADMINISTRATION	7
DOCUMENT VERSION CONTROL HISTORY	8



STATEMENT OF POLICY

COMMITMENT

The Equity Trustees Group (Equity Trustees) is committed to achieving sustained performance and delivering value to our clients and shareholders while maintaining high standards of integrity and ethical behaviour.

Equity Trustees adheres to the relevant principles and standards of ethical and professional conduct and corporate governance in each jurisdiction where we operate.

PURPOSE

The EQT Group Code of Conduct and Ethics ("**the Code**") sets standards for the way we do things at Equity Trustees and provides a set of guiding principles to help you make decisions in your day-to-day roles.

In some circumstances, this will include times when you are outside your immediate workplace or working hours, for example at work functions, out of hours work activities or when you are out in the community on behalf of Equity Trustees.

The Code is not a substitute for good judgement and incorporates the shared values that guide how we interact with each other, our clients, shareholders and the community, as well as conduct our business.

APPLICATION

The Code applies to all directors, employees and contractors of Equity Trustees, and its controlled entities, including when acting at Equity Trustees request in operational roles or as directors for other entities.

REVIEW

The Code will be reviewed every three (3) years.

It is the Policy Owner's responsibility to ensure that, should there be any significant change in the internal or external environment within this time, a review is conducted immediately.

BREACHES

Equity Trustees takes any breach of the Code seriously. All reports will be investigated and may result in disciplinary action up to and including termination of employment.

Equally, intentionally false or malicious reports may also result in disciplinary action up to and including termination of employment.



POLICY PRINCIPLES

We all want to do what is right, for ourselves and for the Company.

The EQT Group Code of Conduct and Ethics will help guide you, and defines how directors, employees and contractors should conduct themselves as representatives of Equity Trustees.

No matter what your role or location you are expected to demonstrate the behaviours outlined in this Code, set an example for others around you and speak out when you feel that these behaviours are threatened or compromised.

OUR SUCCESS DEPENDS ON THE TRUST OF OUR CLIENTS

The word trust is synonymous with the Equity Trustees brand, and it is one of the key factors in creating a great client experience and long-term client relationships. Every time you interact with a current or prospective client, you can earn their trust.

You must:

- Put your clients first¹;
- Do what you say you will; and
- Provide excellent service by adhering to our [Client Service Standards](#)

WE BEHAVE TO THE HIGHEST STANDARDS WITHOUT EXCEPTION

As a Trustee in Australia and Independent Authorised Corporate Director and Management Company in the UK and Europe, the majority of tasks we carry out are done on a fiduciary basis, which means we will *always* put beneficiaries ahead of our own interests.

Our clients, shareholders and the community expect everyone who works at Equity Trustees to act professionally and ethically at all times. In everything you do you should consider how your or someone else's actions could impact on Equity Trustees' reputation and performance, and take action to prevent or remedy anything that could adversely impact the Company.

You must:

- Act with integrity and professionalism at all times;
- Display the principles of fairness and objectivity in all your interactions; and
- Avoid even the appearance of improper behaviour

WE TREAT EVERYONE WITH DIGNITY AND RESPECT

Equity Trustees values diversity and is committed to achieving a diverse workforce that is inclusive and respectful of each other's differences. Unlawful discrimination, harassment, bullying or victimisation, or other unacceptable or offensive conduct will not be tolerated.

Equity Trustees is also committed to providing a safe working environment that promotes the safety, security and physical and mental health and well-being of our employees.

You must:

- Be respectful, constructive and appropriate in all of your dealings;
- Embrace diversity and value other's differences and opinions; and

¹ The interests of beneficiaries and investors is of the utmost importance. Refer to "We behave to the highest standards without exception" for further information.



- Take care of your own health and safety, as well of those around you

WE COMPLY WITH ALL LEGAL, REGULATORY AND FIDUCIARY REQUIREMENTS, AS WELL AS INTERNAL POLICIES AND STANDARDS

Equity Trustees has a range of established corporate internal policies to support compliance with the various laws, relevant industry standards and policies, along with documented plans, controls and ongoing monitoring at all levels of the business.

You must:

- Follow the law;
- Comply will all requirements of your role; and
- Ensure the accuracy of all Company business and financial records

VALUES

At Equity Trustees, our values represent the core of who we are:

- Trusted;
- Accountable; and
- Empowering

All directors, employees and contractors are required to live every one of our values, every day.

TRUSTED

We are trusted. This means we do what we say we will and put the best interests of our clients first.

ACCOUNTABLE

We are accountable. This means we own our responsibilities and speak up about ways we can do better.

EMPOWERING

We are empowering. This means we give ourselves, our workplace and our community the support, strength and confidence to grow.

CONSIDER YOUR ACTIONS AND ASK FOR GUIDANCE

If ever in doubt about a course of conduct, ask yourself:

- Is it consistent with the Code?
- Is it legal?
- Is it ethical?
- Will it reflect well on me and the Company?
- Would I want to read about it in the newspaper?

If the answer is "No" to any of these questions, don't do it.

If you are still uncertain, ask for guidance.

WHERE TO GET HELP?

Additional information about the Code can be found on the intranet, or by contacting your Line Manager, Human Resources or Enterprise Risk.



ACCOUNTABILITIES

DIRECTORS

- Create a culture of ethics and compliance;
- Lead by example and role model our values; and
- Always act in accordance with the Code

MANAGEMENT

- Understand the Code and always act in accordance with it;
- Ensure that the people you supervise understand their responsibilities under the Code and other Company policies;
- Consider conduct in relation to the Code and other Company policies when evaluating employee performance;
- Create an environment where employees feel comfortable raising concerns without fear of retaliation;
- Never encourage or direct employees to achieve business results at the expense of ethical conduct or compliance with the Code;
- Always act to stop violations of the Code or the law by those you supervise; and
- Report suspected breaches of the Code to Human Resources or Enterprise Risk and ensure that reports are based on truth and fact and are made in good faith

EMPLOYEES AND CONTRACTORS

- Understand the Code and always act in accordance with it;
- Comply with the Code and the law wherever you are;
- Live every value, every day;
- Refer to the Code when deciding on a course of conduct and seek guidance if unsure; and
- Report suspected breaches of the Code to your Line Manager, Human Resources or Enterprise Risk and ensure that reports are based on truth and fact and are made in good faith

WHISTLEBLOWER

There may be times when it is inappropriate to report a breach to your Line Manager, Human Resources or Enterprise Risk. In this circumstance you should raise your concern:

- in Australia, to an Equity Trustees Whistleblower Protection Officer (WPO) or our external Whistleblower service provider, Stopline (*for further information, please refer to the Whistleblower Policy*); or
- In the UK, to the Whistleblower Champion (*for further information, please refer to the ETFS Whistleblowing Policy*); or
- in Ireland, in accordance with the Public Interest Disclosure (Whistleblower) procedure in the ETFSI Employee Handbook



POLICY ADMINISTRATION

Document Title	EQT Group Code of Conduct and Ethics
Policy Level	1
Version No.	V.3 / 2021
Policy Owner	Managing Director
Related Policies <i>(These must be read in conjunction with policy)</i>	
Supporting procedures or guidelines <i>(These must be read in conjunction with policy, as applicable)</i>	Whistleblower Policy EQT Group Unacceptable Behaviour Policy and Procedure EQT Group Diversity and Inclusion Policy EQT Group Workplace Health Safety and Security Policy Employee Handbook (UK) Employee Handbook (Ireland) ETFS Whistleblowing Policy
Approval Date	14 July 2021
Effective Date	1 August 2021
Next scheduled review	July 2024
Regulator (if applicable)	Not Applicable
Review and Approval Body	RHRNC, EQTHL, ETSL, ETWSL, EQTL, ETFS and ETFSI



DOCUMENT VERSION CONTROL HISTORY

VERSION NO.	UPDATED/PREPARED BY	DATE	APPROVED BY
V1/2019	ER – Transfer to new template no approval required.	12/03/2019	N/A
V2/2019	Sharni Redenbach, Executive General Manager, HR	05/07/2019	EQTHL Board
V3/2021	Sharni Redenbach, Executive General Manager, HR	03/07/2021	
V3.1/2021	Sharni Redenbach, Executive General Manager, HR	20/10/2021	ETFS Board
V3.1/2021	Sharni Redenbach, Executive General Manager, HR	14/12/2021	ETFSI Board