



Code of Conduct

1/10/2022



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1. Overview

Pioneer Credit Limited, its related entities and subsidiaries (“Pioneer” or “Group”) is committed to acting with integrity, honesty and fairness in all practices and to observing the rule and spirit of the regulatory environment in which the Group operates.

This Code of Conduct:

- a) establishes the standards of behaviour expected of the Board, Executives, employees, contractors and consultants (Personnel) when dealing with each other, shareholders, customers, other stakeholders and the broader community;
- b) is to maintain confidence in the Group’s integrity, and support its reputation and corporate image;
- c) sets out the responsibility and accountability of individuals for reporting and investigating reports of unethical practices; and
- d) makes all Personnel aware of the consequences if they do not meet the standards expected at Pioneer.

This Code applies in addition to, and not to the exclusion of, the Group’s other policies.

2. Responsibilities to shareholders

The Group aims to:

- a) increase shareholder value within an appropriate framework which safeguards the rights and interests of the Group’s shareholders and the financial community; and
- b) comply with systems of control and accountability which the Group has in place as part of its corporate governance, with openness and integrity.

3. Responsibilities to customers

The Group is committed to help its customers overcome financial challenges, and to serve its purpose to ‘put an end to debt stress’. Personnel must act with empathy, fairness and honesty and ensure that customers’ unique circumstances are considered, that the experience received by a customer is aligned to the Pioneer Principles, and that any solution provided is sustainable and values based.

4. Compliance with laws

The Group will comply with all legal and regulatory requirements which apply to its business. Any contravention, or likely contravention of any applicable laws or regulations is to be reported to the Managing Director as soon as you become aware.

You should be aware of, and comply with, your obligations under all laws and regulations relating to your work and are encouraged to utilise the Group's Learning Management System and complete any learning modules applicable to your role.

If you have a question as to whether a particular law or regulation applies, or how they may be interpreted, please contact the Company Secretary.

5. Conflicts of Interest

A conflict of interest exists where loyalties are divided. You will have a conflict if, in the course of your employment or engagement with the Group:-

- a) any of your decisions lead to an improper gain or benefit to you or someone associated with you; or
- b) your personal interests, the interests of someone associated with you, or obligation to some other person or entity, conflict with your obligation to the Group.

You must not involve yourself in situations where there is an actual or potential conflict. If you are concerned that you have a conflict, you should disclose that interest to:

- a) the Chair in the case of a director, officer or the Managing Director;
- b) the Managing Director in the case of a member of management; or
- c) a supervisor in the case of an employee,

so that it may be considered and dealt with in an appropriate manner for all concerned. You are responsible for notifying the Group of any actual or potential conflicts. Refer to the *Conflicts of Interest Policy Statement* and *Conflicts of Interest System Procedure* for further information.

6. Protection of assets

You must use your best efforts to protect the Group's assets and to ensure their availability for legitimate business purposes, and to ensure all corporate opportunities are enjoyed by the Group, so that no property, information or position belonging to the Group, or opportunity arising from these, is used for personal gain or to compete with the Group.

7. Protection of Confidential Information

Confidential Information is any information generated by or contained within the Group, irrespective of whether that information has passed to any third party or has been published. It includes information that the Group owns, develops, pays to have developed or to which it has an exclusive right, and includes information of third parties to which the Group has access.

Any officer or employee must ensure that they do not disclose any Confidential Information to any third party or other Personnel who do not have a valid business reason for receiving that information, unless

required by law.

If Confidential Information is required to be provided to any third party you must:

- a) take adequate precautions to seek to ensure that the information is only used for those purposes for which it is provided and is not misused or disseminated to the Group's detriment. Such precautions include obtaining a confidentiality agreement or other undertaking (advice about these measures can be obtained from the Company Secretary); and
- b) take steps to ensure that the information is returned or destroyed when the purpose is complete.

These obligations continue to apply to you after your employment or engagement with the Group ends.

8. Employment practices

The Group is committed to being an exceptional place to work, including:

- providing equal opportunities to every person, and to the promotion of diversity, inclusion and belonging;
- being a safe work place which maintains proper occupational health and safety practices;
- acting with integrity and treating every person with respect.

9. Privacy

The Group respects your privacy, and the privacy of others, and you should familiarise yourself with, and comply with the privacy policies of the Group.

If you have any questions about privacy, contact the Privacy Officer or Company Secretary.

10. Gifts and hospitality

From time to time you may give or receive gifts (including hospitality or any benefits of value) in connection with or arising from your connection with the Group.

You must not give, seek or accept any Gift over \$100 which may be perceived as representing a conflict of interest, or may be reasonably seen to compromise your integrity. Where a gift is offered in excess of \$100, it must be reported to the Company Secretary at within one week of receiving the gift and recorded in a Gift Register.

Where offering a gift for official purposes, any gifts purchased from Pioneer funds must be approved in advance by the Managing Director, or in his absence the Company Secretary.

This section of the Code should be read in conjunction with the *Gift Policy*.

11. Financial and other inducements

Most countries, including Australia, have specific legislation prohibiting any person or company from offering a bribe to a government official or for an official to receive a bribe.

The Group does not permit the making of payments (including payments in kind such as gifts or favours) to influence individuals to award business to the Group or to make decisions in the Group's favour. You must not give or offer to anyone a gift, bribe, inducement, favour or payment of any kind in expectation of preferred treatment of the Group, its employees or anyone associated with the Group.

In some countries in which the Group operates, employees may be asked to make small payments to low-level public officials or government employees, which are sometimes called facilitation payments. These payments are sought to expedite or bring about routine services or actions by those individuals.

The Group does not support making these payments as a matter of policy, and expects employees and officers to make every effort to avoid them.

Where a payment of this kind cannot be resisted the payment must, at a minimum, be approved by the Managing Director and Company Secretary jointly and be accounted for clearly and accurately. A record must be kept detailing the value of the benefit, the date on which the conduct occurred, the identity of the foreign public official and particulars of the routine government action that was sought to be expedited or secured.

This Code does not prohibit any payments, including facilitation payments, where these payments are made in accordance with the Criminal Code and this Code.

This section of the Code also applies to agents and third parties who are engaged by the Group to represent its interests.

12. Consequences of breach

Any breach of compliance with this Code is to be reported directly to the Chair of the Board of Directors of Pioneer, Managing Director, or Report and Investigation Officer, as appropriate. Anyone breaching this Code may be subject to disciplinary action, including termination.

The Group has a *Whistleblower Policy* to encourage reporting of breaches (or suspected breaches) and to provide effective protection from victimisation to those reporting such a matter by implementing systems for confidentiality and report handling.

13. Review of Code of Conduct

The Company will monitor compliance with this Code periodically by liaising with Personnel. The Board will review and approve this Code for any change, and at least annually.

14. Contact details:

Company Secretary	companysecretary@pioneercredit.com.au
Report & Investigation Officer	reportinvestigation@pioneercredit.com.au
Managing Director	kriohn@pioneercredit.com.au
Chairman	chairman@pioneercredit.com.au

15. Code of Conduct history

25 February 2014	Code of Conduct adopted.
October 2022	Last reviewed

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