



# Code of Conduct

30/04/2025





Diversity and Inclusion are realised through more than simply subscribing to a target, or an intention to consider. It is through a broad mindset, of different ideas, formed from different experiences, and a willingness to genuinely embrace that which is different.

At Pioneer we genuinely welcome each person's difference. We encourage and champion it. We learn from it. We are challenged by it. **We call this Belonging.**

**Diversity** is the many characteristics of the people who make up a community and how they identify.

Race, gender, age, ethnicity, religion, national origin, disability, sexual orientation, vaccination preferences are *some* examples of how diversity is described.

Pioneer is composed of a diverse group of people, which leads to diverse opinions and ideas which, when founded in good, significantly contribute to culture, and to producing better outcomes for everyone.

**Inclusion** is the ability to recognise, respect, and value differences in those around us. It focuses on the action and understanding of what makes us diverse. Inclusion requires listening, empathy, openness, and consideration.

**Belonging** is where there is security and support, and true acceptance and genuine consideration of an individual.

At Pioneer Belonging exhibits itself in many ways. It starts with team members knowing they can truly bring their full self to their workplace.

Belonging is more than acknowledging diversity through a 'seat at the table' culture. We aim to amplify every person's voice, remove barriers and appreciate each other for their uniqueness.

**Diversity is a fact. Inclusion is a behaviour. Belonging is the emotional outcome that we want Pioneer's culture to be known for.**

## 1. Overview

Pioneer Credit Limited and its subsidiaries (“Pioneer” or “Group”), through its employees is committed to acting fairly, with integrity and to observe the rules and spirit of the regulatory environment.

This Code of Conduct:

- a) Establishes the standards of behaviour expected of employees, and any contractors or consultant engaged by the Group;
- b) Is to maintain the Group’s integrity and support its reputation;
- c) Sets out the responsibility for reporting and investigating any suspected or actual unethical practices; and
- d) Sets out the consequences if expected standards under this Code are not met.

## 2. Guiding Principles

All employees are expected to behave in alignment to Pioneer’s Purpose and Principles.

### Our Purpose

We’re here to put an end to debt stress.

### Our Principles



#### Be human

We see people and seek to understand.



#### Choose integrity

We do what’s right, not what’s easy.



#### Act with purpose

We commit to making a positive difference.

### 3. Responsibilities to shareholders

The Group aims to:

- a) Increase shareholder value and;
- b) have appropriate systems of control to underpin its corporate governance standards

### 4. 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'. Employees must act with empathy, fairness, respect 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 to a customer is sustainable and values based.

### 5. Compliance with laws

The Group will comply with all legal and regulatory obligations. Any contravention, or likely contravention of those obligations must be reported to the [Report & Investigation Officer](#) or the [Chair of the Audit and Risk Management Committee](#) as soon as an employee becomes aware of any such contravention or likely contravention.

You should be aware of, and comply with, your obligations under any laws and regulations relating to your work and should use the Group's Learning Management System to ensure you are 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](#).

### 6. Conflicts of Interest

A conflict of interest exists where your actual or perceived personal interests, including but not limited to family, friendships, financial or social factors, could compromise your judgement, decisions, or actions in the workplace.

You will have a conflict, if in the course of your work with the Group, any of your decisions lead to an improper gain or benefit to you or someone associated with you.

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;
- b) The Managing Director in the case of a member of management; or
- c) A leader or senior leader in the case of a team member,

so that it may be considered and dealt with in an appropriate manner.

You are responsible for notifying the Group of any actual or potential conflicts. Refer to [the Conflicts of Interest Policy Statement](#) and [Conflict of Interest Work Procedure](#).

## 7. Protection of assets

You must use your best efforts to protect the Group's assets and to ensure their availability for 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.

## 8. Protection of Confidential Information

Confidential Information means all customer and employee data, trade secrets, ideas, know-how, concepts and information whether in writing or otherwise and all other information relating to the Group and its affairs or businesses, sales, marketing or promotional information, which is not in the public domain.

You must ensure that you do not disclose any Confidential Information to anyone who does not have a proper reason for receiving that information, unless you are required to by law.

If Confidential Information is required to be provided to anyone you must take adequate precautions to ensure that the information is only used for those purposes for which it is provided, including obtaining a confidentiality agreement in the Group's favour (advice about these measures must be obtained from the Company Secretary).

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

## 9. Employment responsibilities

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

- Providing equal opportunities to every person, and to the promotion of [Belonging](#);
- Being a safe workplace which maintains proper occupational health and safety practices; and
- Acting with integrity and treating every person with respect.

All employees have responsibilities that form part of their employment or engagement with the Group. These include, but are not limited to:

- Being aware of and complying with this Code of Conduct.
- Modelling the Group's Purpose and Principles when engaged with any work activities
- Complying with the Group's compliance requirements.
- Keeping all records, documents, and communications accurate and up to date.
- Informing yourself and complying with the Group's policies and procedures relevant to your position.
- Never acting in a discriminatory, harassing, bullying or violent way towards others.
- Never using your position to gain an advantage over or exploit the vulnerability of others.
- Making decisions ethically, fairly and without bias, using the best information available.
- Using the Group's IT infrastructure, including but not limited to emails, internet and MS Teams, in an appropriate manner.
- Ensuring that personal comments (either verbal or written) made in a public capacity are not attributed, either expressly or implied, to the Group. This includes using Pioneer emails or other platforms tied to the Group to express personal opinions.

## 10. 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](#).

## 11. Gifts and hospitality

From time to time you may give or receive gifts (including hospitality) in connection with your position with the Group.

You must not give or seek or accept any Gift. Where a gift is offered to you in excess of \$100, it must be approved in advance by the Managing Director, or in his absence the Company Secretary prior to it being accepted. It must also be reported to the [Company Secretary](#) within one week of receiving the gift and recorded in a Gift Register.

This section of the Code should be read in conjunction with the [Gift and Benefits Policy](#).

## 12. Financial and other inducements

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 team members or anyone associated with the Group.

In some countries in which the Group operates, team members 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 team members 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.

## 13. Consequences of breach

Any breach of compliance with this Code is to be reported directly to the [Chair of the Board of Directors](#), [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.

## 14. Review of Code of Conduct

The Board will review and approve this Code for any change at least annually.

## 15. Contact details:

Company Secretary	<a href="mailto:companysecretary@pioneercredit.com.au">companysecretary@pioneercredit.com.au</a>
Report & Investigation Officer	<a href="mailto:reportinvestigation@pioneercredit.com.au">reportinvestigation@pioneercredit.com.au</a>
Privacy Officer	<a href="mailto:privacy@pioneercredit.com.au">privacy@pioneercredit.com.au</a>
Managing Director	<a href="mailto:krjohn@pioneercredit.com.au">krjohn@pioneercredit.com.au</a>
Chairman	<a href="mailto:chairman@pioneercredit.com.au">chairman@pioneercredit.com.au</a>
Chair of the Audit & Risk Management Committee	<a href="mailto:auditchair@pioneercredit.com.au">auditchair@pioneercredit.com.au</a>

## 16. Code of Conduct History

25 February 2014	Code of Conduct adopted
October 2022	Document reviewed
April 2025	Last reviewed

**Thank You.**

