



14 August 2024

# Code of Conduct

A guide to representing Pioneer

# Overview

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Pioneer Credit Limited and its subsidiaries (“Pioneer” or “Group”), through its employees, are committed to acting fairly, with integrity and to observing 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.



# Diversity and Inclusion

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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 what is different.

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



# Diversity and Inclusion continued



- **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, and 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. This significantly contributes to culture and produces 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. At Pioneer, inclusion exhibits itself in many ways. It starts with team members knowing that they can truly bring their whole selves to the workplace.
- **Belonging** is where there is security, support, true acceptance, and genuine consideration of an individual. 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 person for their uniqueness.

**Diversity is a fact, inclusion is a behaviour, and belonging is the emotional outcome we want Pioneer's culture to be known for.**

# Guiding Principles

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Our Purpose: **We're here to put an end to debt stress.**

We exist to put an end to debt stress for our customers by offering flexible solutions. We take the time to listen and treat our customers with empathy and respect, equipping them with the support they need to achieve their financial goals.

All employees are expected to behave in alignment with Pioneers' Purpose.



# Guiding Principles

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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.

Our three principles are driven by our team of proud Pioneers. Every day, we showcase these principles in small and big ways. All employees are expected to behave in alignment with Pioneers' principles.

# Responsibilities to Shareholders

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The Group aims to:

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



# Responsibilities to Customers

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The Group is committed to helping its customers overcome financial challenges and serving its purpose to 'put an end to debt stress'.

Employees must act with **empathy, fairness, respect, and honesty**, and ensure that a customer's unique circumstances are considered. Employees must provide an experience for the customer that is aligned with the Pioneer principles, and ensure that the solution provided is sustainable and values-based.





# Compliance with Laws

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The Group will comply with all applicable 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. You should use the Group's Learning Management System to ensure you adhere to these standards 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.



# Conflicts of Interest

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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,

This will ensure that it's considered and dealt with appropriately.

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](#).



# Protection of Assets

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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.



# Protection of Confidential Information

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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.



# 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 that 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 comply 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 appropriately.

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.

# Privacy

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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*.



# Gifts and Hospitality

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

You must not give, 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.



# 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.



# Consequences of Breach

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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.



# In Review



## Review of Code of Conduct

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

## Code of Conduct History

- Code of Conduct adopted: 25 February 2014
- Document reviewed: October 2022
- Last reviewed: May 2024

## Contact details

Company Secretary

[companysecretary@pioneercredit.com.au](mailto:companysecretary@pioneercredit.com.au)

Report & Investigation Officer

[reportinvestigation@pioneercredit.com.au](mailto:reportinvestigation@pioneercredit.com.au)

Privacy Officer

[privacy@pioneercredit.com.au](mailto:privacy@pioneercredit.com.au)

Managing Director

[krjohn@pioneercredit.com.au](mailto:krjohn@pioneercredit.com.au)

Chairman

[chairman@pioneercredit.com.au](mailto:chairman@pioneercredit.com.au)

**Thank you for adhering to our code  
of conduct.**

