

# Code of Conduct

July 2017

## 1 Purpose and Application

The Code of Conduct establishes important principles that should guide all employee decision making and behaviour.

Every Pental Group Limited (Pental) employee is responsible for his/her own behaviour and is responsible for the choices they make. The Code of Conduct is designed to help employees incorporate Pental core values of integrity, honesty, respect, teamwork and high performance, in their decision making and behaviour.

Pental's key principles are:

- We act with honesty and integrity;
- We respect the law and comply with all laws and regulations;
- We respect confidentiality and do not misuse information;
- We value and maintain professionalism;
- We work collaboratively as a team;
- We manage conflicts of interest responsibly; and
- We strive to be a good corporate citizen and achieve community respect.

This policy applies to all employees, secondees, as well as work experience students and contractors employed by or working for Pental Group Limited. If this policy applies to you, you should read it and make sure you understand it. If you need guidance, speak to your people leader or Human Resources.

## 2 We act with honesty and integrity

Pental is judged by how its employees behave. Pental will earn the respect it deserves if employees act with honesty and integrity in all business dealings and interactions and do what the right thing at all times.

We achieve honesty and integrity in our actions by:

- Not tolerating dishonest behaviour by our colleagues or clients;
- Abiding by all terms and conditions of our employment contracts and Pental policies;
- Taking responsibility and being accountable for all Pental resources and property used in the performance of our duties;
- Not using funds, information or property of Pental or its clients for our own benefit, and by not assisting others in such behaviour; and
- Maintaining records and recording transactions in an accurate and timely manner.

## 3 We respect the law and comply with all laws and regulations

Pental employees must comply with all laws and regulations in the countries in which we operate. Violations of laws and regulations can have serious consequences for Pental and the individual concerned (including criminal, civil and administrative sanctions). We comply with laws and regulations, not simply because they are law but because it is right to do so.

To achieve this goal, employees must;

- Comply with our internal standards, which help us meet our ethical, legal and regulatory obligations and minimise risk to ourselves and Pental;
- Respect the customs and business practices of the countries in which we operate, but do not compromise the principles embodied in this Code;

- Discharge our authority (if any) to sign documents on behalf of Pental responsibly and our signature indicates that we have received and understood the nature of the document being signed and that it has been properly reviewed and authorised;
- Understand and act within our authority;
- Report suspicious matters to the relevant authorities as required by law;
- Notify our people leader of any breach of the law or any Pental policies by a colleague in the course of their employment;
- Not trade in shares or securities in a company if we might have access to price-sensitive information not generally available to the public about that company;
- We respect the property rights of others.

## 4 We respect confidentiality and do not misuse information

We confidentially treat Pental's business affairs and those of our clients, colleagues and business associates. We comply with laws which govern the use and disclosure of information, including privacy laws. We ensure that confidentiality is maintained and information is not misused.

We respect the confidentiality of Pental, its clients, business associations and employees by:

- We commit to keeping confidential, information which we learn about Pental, our clients and business associates during our employment. We maintain this confidentiality even after we have left Pental;
- We do not encourage or pressure others to disclose confidential, sensitive or privileged information, including individual remuneration details;
- We do not use confidential information for personal gain, or for the gain of others such as friends, relatives or business associates;
- We access confidential information only for authorised work-related tasks.

## 5 We value and maintain professionalism

We maintain professionalism as it fosters and preserves our reputation as individuals and the reputation of Pental. It is more than simply conducting ourselves ethically. It involves the pursuit of excellence, as we strive to achieve the highest quality in our work.

We must always act in an ethical and professional manner. If we compromise this principle, we will lose the respect and confidence of our colleagues, clients and business partners.

Examples of the way we fulfil this responsibility include:

- We take responsibility and are accountable for the decisions we make in performing our duties;
- We maintain and strive to improve the skills, knowledge and competencies that are required for our position;
- We limit any advice to clients to factual explanations which we are competent to provide, or to such financial or other advisory services that we are expressly authorised to provide;
- We are committed to diversity, fairness and equal employment opportunities;
- We will not participate in activities (such as gambling, drug or alcohol use) either on work premises, during work hours or outside of work, that adversely affect the performance of our duties;
- We do not tolerate bullying or harassment (including offensive language) or unlawful discrimination;
- We do not initiate or perpetuate rumours or false information about listed securities which may cause the value of the security to be higher or lower than it should be in the absence of the rumour;
- We only use Pental property, including information technology resources, for proper purposes.

## 6 We work collaboratively as a team

We work together as a team and treat each other with respect and dignity, promoting an environment that enables our team to reach its full potential.

Examples of how we promote teamwork include:

- We deliver on commitments to other team members, including meeting deadlines and agreed actions;
- We identify opportunities and take actions to build relationships with teams in other business units to achieve business goals;
- We collaborate with colleagues, actively working with other areas of the company to deliver solutions that meet clients' needs;
- We show respect to our colleagues through our communication and interaction, providing each other with opportunities to share our ideas;
- We effectively communicate and pro-actively keep team members informed of activities and share ideas, information and skills;
- We share recognition and credit with team members;
- We maintain up to date records on our current procedures and internal processes so our colleagues know what we have done and why we have done it.

## 7 We manage conflicts of interest responsibly

We manage conflicts of interest to maintain our clients' loyalty and build business through trust. A conflict of interest occurs where an employee has a personal or professional interest sufficient to influence, or appear to influence, the objective performance of their duties and responsibilities to Pandal.

We do not participate in activities that involve a conflict with our duties and responsibilities to Pandal, or which are prejudicial to the business of Pandal.

We also do not put ourselves in a position of conflict with the interests of our clients or a position which unfairly puts the interests of one client above another's, regardless of the nature or size of their relationship with us, be it personal or business.

Some examples of how we manage conflicts of interest include:

- We seek the consent of the Pandal Group CEO or CEO, Pandal Australia before accepting a directorship on the board of another (non-Pandal) company;
- We disclose any material interests we have in our clients and suppliers to Risk & Compliance;
- We do not participate in business activities outside our employment in the Pandal without the approval of the Pandal Group CEO or CEO, Pandal Australia if it could adversely affect our ability to carry out our duties and responsibilities to Pandal;
- We do not solicit, accept or offer money, gifts, favours or entertainment which might influence, or might appear to influence, our business judgement;
- We aim to provide disclosures to clients and potential clients that are clear, concise and effective.

## 8 We strive to be a good corporate citizen and achieve community respect

We uphold Pental's commitment to good corporate citizenship while pursuing its business objectives.

Examples of how we uphold this commitment include:

- We involve ourselves in and strive to make a contribution to the community;
- We consider the broader impact of our decisions on our colleagues, clients and community;
- We act fairly and reasonably towards our clients and potential clients in a consistent and ethical manner;
- We promote sound and robust investment strategies and practices.

## 9 It's our Responsibility

Complying with this Code is the responsibility of all employees and contractors.

Employees and contractors who breach this Code of Conduct may face disciplinary action including termination of their employment or engagement with Pental.

Each of us has a responsibility to abide by this Code and its principles, and to report breaches to your people leader, or Human Resources or Risk & Compliance. If you are unsure whether an action is a breach, you should raise the matter with your People leader, or through another appropriate reporting channel.

## 10 General

This Policy does not form part of Pental employment contracts and does not impose any binding obligations on Pental. Pental may vary this Policy from time to time.

For more information visit [pentalgroup.com](https://pentalgroup.com)

**PENTAL**

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