

OP-04-MA01	Code of Conduct
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BOARD POLICY

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or

MANAGEMENT POLICY

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If Management Policy, does it require Board approval?

YES ☐ NO ☒

Policy Owner	Chief Operations Officer
Policy Sponsor	Chief Executive Officer
Review Cycle	Annual

DOCUMENT HISTORY / VERSION CONTROL

Version No.	Date of creation/revision	Scope of changes	Date of next review
V1.1	May 2015	Review of Content	May 2016
V1.2	August 2018	Review of Content and updates	August 2019
V1.3	March 2022	Review of Content and updates	March 2023

RELATED DOCUMENTS

- A. Conflicts of Interest Policy
- B. Fit and Proper Policy and Declaration
- C. Occupational Health and Safety Policy
- D. I.T Acceptable Use Policy
- E. Media Policy
- F. Privacy Policy
- G. Workplace Behaviour and Corporate Dress Policy
- H. Credit Card Policy
- I. Whistleblower Policy

1. Code Statement

Ansvar Insurance Limited (“Ansvar”) is committed to ensuring its employees act with honesty, integrity and fairness when conducting all business activities.

All employees and associated stakeholders (including but not limited to contractors) must adhere to this Code of Conduct (“Code”) at all times.

2. Scope

The objectives of the Code are to ensure our employees:

- act with honesty, integrity, and fairness at all times;
- deliver consistently high standards of customer service;
- comply with all relevant legislative and regulatory frameworks;
- remain aware of their responsibilities to Ansvar under their Employment Agreements or contracts of service;
- represent both Ansvar and the insurance industry in a professional and responsible manner.

3. Roles and Responsibilities

3.1. Policy Owner

The owner of this policy is Chief Operations Officer (COO) of Ansvar.

Once the Policy Sponsor has approved the new/revised policy, the Policy Owner is responsible for implementing and ensuring ongoing compliance with the policy.

3.2. Policy Sponsor

The sponsor of this policy is the Chief Executive Officer (CEO) of Ansvar.

4. Role and Responsibilities

4.1. Chief Executive Officer

The CEO will be advised of any potential breach of this Code, and will ultimately decide what corrective action is required.

4.2. Chief Operations Officer

The COO will be advised of any breach of this Code and will report the matter to the CEO and Chief Risk Officer.

4.3. Chief Risk Officer

The CRO will ensure that any alleged breach of this Code is appropriately investigated, managed and reported.

If the matter is significant, the CRO and CEO will advise the Risk Committee and the Board accordingly.

4.4. Employees and associated stakeholders

All Ansvar employees and associate stakeholders will adhere to the Code and report any alleged breaches to the COO, CRO or directly to the CEO.

5. Code of Conduct

5.1. Conduct

All Ansvar employees and associated stakeholders are expected to act in accordance with the requirements set out in this Code, including the following overarching principles.

- Acting with honesty, integrity and fairness at all times.
- Contributing to Ansvar's reputation as a good corporate citizen, gaining the respect of the communities and environments in which we operate.
- Exercising responsibility, courtesy, respect and sensitivity in all dealings with colleagues, customers, suppliers and the general public.
- Maintaining confidentiality and not misusing Ansvar's information, assets or facilities.
- Maintaining privacy in accordance with the Australian Privacy Principles.
- Avoiding any actual, potential or perceived conflicts of interest when engaging in business activities.
- Performing all duties in a manner that maximises trust, workplace safety and minimises environmental impacts.
- Complying with all Ansvar policies and procedures.
- Acting in accordance with the law.
- Speaking up to hold each other accountable for adhering to this Code.

5.2. Gifts, Gratuities and Conflicts of Interest

Gifts or gratuities received should be declared to your divisional Executive and recorded on the Gifts Register. The **Gifts and Hospitality Policy** outlines the value limit and criteria for accepting gifts. The following gifts and hospitality are strictly prohibited:

- Acceptance of any cash amount
- Bribes or 'kickbacks'
- Gifts or hospitality which has the potential to be, or to be seen to be, giving rise to a conflict of interest.

Any attempt by a third party to provide any of the above must be reported to the CEO or CRO without delay.

Conflicts of interest can arise if an employee or associated stakeholder has a direct personal interest or an indirect interest (through a family member, friend or associate) in a business decision involving Ansvar.

If an individual believes they may have a conflict or potential conflict of interest, this should be immediately reported to their divisional Executive. More information can be found in the **Conflicts of Interest Policy**.

5.3. Bribery

Under no circumstance may an employee or associated stakeholder offer or accept cash or any other incentive, inducement or reward in any form. In particular, payments to win business or to influence a business decision in Ansvar's favour such as bribes, 'kick-backs', secret commissions and similar payments ("bribes") are strictly prohibited. All business dealings should be accurately documented to reflect the true nature of the transaction.

All employees and associated stakeholder's should take all practical steps to ensure that agents, contractors, intermediaries and / or business partners do not engage in conduct on our behalf that would contravene this Code or generally accepted behaviour.

Bribes and other corrupt payments or benefits are not only a contravention of this Code, but may constitute a criminal offence under the Australian Criminal Code, the criminal laws of Australian States and the laws of most foreign countries. In addition, liability may extend not only to the individuals directly involved in making the payment or giving the benefit, but also to Ansvar and its Directors or officers who expressly or implicitly authorised or permitted the payment to be made or the benefit to be given.

Any allegation of bribery will be investigated and if found to be true, could result in the termination of employment effective immediately.

5.4. Fraud

Everyone has a responsibility to report an act of fraud or suspicious conduct. Any fraudulent act or suspicious conduct should be reported to the CRO. If the CRO is suspected of committing the act or conduct, the matter should be reported to the CEO.

Any allegation of Fraud will be investigated and if found to be true, could result in the termination of employment effective immediately.

The CEO in consultation with the COO, will notify the Police however confidentiality of the person making the report will be preserved at all times and the individual will be protected from reprisal. Ansvar's **Whistleblower Policy** provides further guidance and can be accessed via the intranet.

5.5. Care and diligence

Everyone at Ansvar must exercise due care and diligence in performing their duties and responsibilities. This should include such activities as ensuring the accuracy of all decision-making information, attending to detail in all aspects of work, being mindful of the sensitivities of others, protecting confidentiality and being courteous, open and honest at all times.

Ansvar expects and encourages optimum performance from all employees and associated stakeholders so that Ansvar can achieve its business goals. Where the quality of the services provided by Ansvar is not satisfactory to its customers, Ansvar will take prompt remedial action.

5.6. A safe workplace

The provision of a safe working environment for everyone is a priority and non-negotiable. Detailed descriptions of Ansvar's **Workplace Health and Safety Policies** are available on Ansvar's intranet.

5.7. Confidentiality

Employees and associated stakeholders must not breach Ansvar's confidentiality or make use of confidential information obtained from Ansvar for personal gain or in a manner that would be detrimental to Ansvar. Confidential information will not be used except in ways that are authorised by Ansvar or are legally mandated. The same applies to confidential information belonging to third parties that a team member or associated stakeholder may obtain in the course of their duties.

All employees and associated stakeholders acknowledge the need for confidentiality by signing an Acknowledgement of Confidentiality upon commencement of employment or engagement and must not seek to obtain sensitive information that is not relevant to the performance of their duties. Unless a team member or associated stakeholder has permission, they may not use, disclose or discuss that information whilst employed by Ansvar or after they leave Ansvar. In particular, that information must not be used for personal interests, reward, gain or benefits.

Ansvar will respect the confidential information of its employees and associated stakeholders.

5.8. Fair Dealing

Ansvar, its employees and associated stakeholders must comply with the content and spirit of all relevant laws and regulations concerning employment or engagement, such as anti-discrimination, equality of employment, and occupational health and safety. Ansvar will endeavour to ensure that all employees and associated stakeholders are treated fairly, equitably and honestly as guided by the **Behaviour in the Workplace Policy**.

5.9. Use of Company Assets

Ansvar's assets must be acquired, maintained and used in an efficient manner and for legitimate purposes. Ansvar's **I.T Acceptable Use Policy** prescribes to team member or associated stakeholders how electronic media such as phones, computers and internet access must be used.

5.10. Outside employment

Ansvar employees are not permitted to take up any position, at all, as an employee, director, partner, agent, contractor or consultant which compromises, or is in conflict with, or affects their performance, whilst employed by Ansvar, or if not in conflict with their position, CEO approval is required.

5.11. Making Public Statements

No employee is permitted to make public statements about Ansvar. Please refer to the **Media Policy**.

Employees and associated stakeholders should also be conscious of their actions when not at work, as these can still affect Ansvar reputation or cause offense to fellow employees and / or associated stakeholders. No comments should be made, with reference to other employees or Ansvar on social media. This information is in the public domain and as a result, subject to Ansvar Media Policy and legislation which regulate communication in public.

5.12. Privacy

Ansvar's Privacy Policy regulates the handling of any personal information that Ansvar collects. A copy of the **Privacy Policy** is available on our Company website.

5.13. Human Resources' Policies

The Human Resources department has a number of policies and procedures. Some of the applicable policies related to this Code of Conduct are listed below:

- Workplace Behaviour and Corporate Dress Policy
- Occupational Health and Safety Policy
- Alcohol and Drug Policy

- Disciplinary and Grievance Procedures Policy
- A full list is available on the Intranet.

6. Reporting Violations of the Code of Conduct

Ansvar will ensure that employees and associated stakeholders are not disadvantaged in any way for reporting violations of the Code or other unethical conduct, and that the matter is dealt with promptly and fairly.

Ansvar's COO and CRO are the appointed representatives responsible for investigating reported breaches.

In the interests of confidentiality and efficiency, reports should where possible be made directly to a representative. However, employees may also make reports to the appropriate business, division or line manager. Subject to the special confidentiality restrictions applying to reports involving potential Corporations Act breaches, reports will be referred under conditions of confidentiality to a representative for investigation.

7. Review and Approval

This Policy is to be reviewed annually by the COO and CRO and approved by the CEO.

Approved by Chief Operations Officer, Policy Owner: **March 2022.**

Approved by Chief Executive Officer, Policy Sponsor: **March 2022.**