

CSF Pty Limited (CSF) is a values driven business and expects all employees to maintain a high standard of conduct and work performance at all times both within and outside of the work environment. The way we conduct ourselves directly contributes to the success of our business and shapes our brand and reputation. It's a fundamental principle that all business activities shall be conducted legally, ethically and responsibly.

Purpose

The purpose of this Code of Conduct is to ensure everyone employed or engaged by CSF in any capacity, including directors, executives, management and employees, understand the ethical and behavioral standards that apply in all business activities. Our values help guide our behavior and decisions we make and reflect our commitment to our members.

Integrity Respect Trust Humility Compassion

Standards of Professional Conduct

Employees and directors of CSF are required to uphold rigorous standards and professional conduct at all times. These include:

- Act in accordance with the law and regulatory compliance requirements.
- Act in accordance with our values.
- Act ethically and honestly at all times.
- Demonstrate a commitment to the profit for member values.
- Perform duties with prudence, diligence and in good faith.
- Act in the best interest of or our members.
- Have respect for fellow employees.
- Disclose any private or other interest that may impact their role as a fiduciary and take all reasonable steps to manage any relevant conflicts of interest.
- Perform their duties diligently, impartially and responsibly and be accountable for their actions and decisions.
- Ensure they don't receive inappropriate financial benefit or receive any other inappropriate material benefit for themselves, their family or friends as a consequence of their role.
- Respect the confidentiality of the business.

Relationships

The strength of CSF is based on relationships formed with others internal and external to the business. All interactions should reflect our value for respect towards others. All representatives of CSF should strive to be honest, courteous, reliable and responsible with all interactions. CSF recognises the need to respect and value the diversity of our workforce and commit to supporting that diversity by providing a working environment where everyone receives fair and just treatment.

CSF looks to foster a workplace free from discrimination, bullying and harassment. CSF expects respect to be shown irrespective of gender, age, race, culture, religion, ethnicity, disability, social and economic status, sexual orientation, political beliefs and family responsibility. Disrespectful behavior observed will not be tolerated.

Confidentiality

Employees and directors must uphold the duty of confidentiality relating to information obtained during the course of their employment with CSF. Information must be stored securely and disclosed appropriately. Personal information is obtained on the understanding it will only be used for the specific purpose it was collected and should remain confidential. Everyone must comply with CSF's Privacy Policy when dealing with an individual's personal information during the course of their official duties.

Improper advantage of any information obtained in the course of employment or once employment has ceased is strictly prohibited. (This includes gaining a personal advantage).

Dishonesty & Fraud

Participating in any type of dishonesty and/or fraudulent activity that directly or indirectly impacts and affects CSF or its members is strictly prohibited. Stealing, borrowing, misappropriating or converting money, information and documents for private use and unauthorised access to information is a criminal action and violates CSF's Code of Conduct. Any such offence may result in dismissal and formal notification to the police.

Concealing errors and omissions or attempting to protect fellow employees who have breached the company's policies and procedures will be viewed very seriously. Anyone who deliberately chooses to ignore or cover up improper conduct of a colleague may be considered to have assisted in committing the offence and may be subject to disciplinary measures and/or police action.

Conflict of Interest

Employees and directors must be vigilant in identifying conflicts of interest (actual, potential or perceived). Where a conflict arises or is likely to arise, the individual should ensure they inform their manager, Chief Risk Officer or Chief Executive Officer and decline to act inappropriately in respect to the duties they owe to the Trustee and fund members. The CSF Conflicts Management Policy provides greater detail in handling and managing conflicts of interest. Full compliance with the Corporations Act is nonnegotiable.

Complying with Laws and Policies

Compliance with legal obligations and regulatory requirements is a requirement placed on all employees and directors of CSF. All CSF employees must be familiar and comply with the applicable laws and regulations of the locations in which they work as well as CSF's policies and procedures. Any breach of the law can have serious consequences both for CSF and for the individuals involved.

Anti-bribery

CSF prohibits any employees or directors from engaging in activity that constitutes bribery, facilitation payments, secret commissions or money laundering. CSF seeks to comply with and uphold all laws against bribery and related conduct. CSF prohibits payment or receipt of bribes nationally and internationally.

Gifts and other Benefits

CSF employees should not seek favours or gifts from anyone who could potentially benefit by influencing a CSF employee. If an employee is sent or offered a gift or benefit, it must be reported. Any gifts or benefits received over the value of \$100, must be disclosed via the CSF Gifts Register. All CSF employees must exercise caution with all personal relationships with members/clients/suppliers to ensure they do not involve obligations that may prejudice or influence any business relationships that may conflict with a person's duties. Refer to the Conflicts Management Policy.

Reporting of Breaches

All CSF employees and directors have an obligation to ensure they comply with this Code of Conduct. If any behavior is identified as a breach of this Code of Conduct, it must be reported through the appropriate management channels. StopLine is CSF's external whistleblowing reporting hotline where a breach or suspected breach of the Code of Conduct can be reported. Non-compliance with the Code of Conduct will be taken seriously and may result in disciplinary action. Any matter reported will be treated confidentially (where possible) and handled in a manner that ensures the person making the report is not disadvantaged for reporting their concerns.