

# CODE OF CONDUCT

---



FREEDOM  
INSURANCE  
GROUP

## TABLE OF CONTENTS

1.	Purpose	3
2.	Background	3
3.	Policy	4
4.	Noncompliance & disciplinary action	10
5.	Implementation	10
6.	Questions	11
7.	Related policies & employment contracts	11

## 1. PURPOSE

---

This Policy affirms Freedom's belief in responsible social and ethical behavior and provides the framework for the conduct of its business. It also mandates the standard of behavior that Freedom expects of all employees in connection with their professional and personal conduct in the workplace and in their dealings with colleagues, suppliers, shareholders, our customers and the public.

This Policy provides guiding principles only and will be supplemented with more detailed policies that relate to some or all of the subject matter contained here and therefore must be read in conjunction with any such other policies issued by Freedom from time to time.

This Policy applies to all employees of Freedom and the principles set out here are designed to help employees make decisions in their day to day work. Whilst no policy can ever cover every conceivable situation employees may encounter in the workplace, before proceeding in any given scenario employees should always consider these general principles and their purpose and act in a way that helps build and maintain both their own reputation and the reputation of Freedom.

## 2. BACKGROUND

---

Freedom is committed to operating a successful business and achieving outstanding performance and results which provide value to its shareholders. However, in striving for this result Freedom will not compromise its ethics or principles or disregard the interests of employees, customers, shareholders and others with whom we do business.

The overarching principles which apply to the operation of Freedom's business are:

- (a) our commitment to creating and maintaining a work environment which is:
  - productive, professional, safe, supportive, fair, honest, flexible and rewarding;
  - diverse yet inclusive and respectful of each other's differences; and
  - free from any form of unlawful, inappropriate, unprofessional or unethical conduct (such as unlawful discrimination, harassment, bullying or intimidation);
- (b) the requirement to operate the business efficiently and ethically and to ensuring that high standards of integrity, trust and fair dealing applies to all Freedom business dealings;
- (c) the need for Freedom and its employees to comply with Freedom's legal, regulatory and contractual obligations;
- (d) enabling the business to be client responsive and ensuring a high level of customer satisfaction;
- (e) to treat our customers with the utmost respect and endeavor to provide them with products and services that are both suitable and which provide them with an excellent outcome;

- (f) to safeguard our employee, customer, shareholder and business data and protect it from misuse or unauthorised disclosure;
- (g) to protect Freedom property and to use that property efficiently and for lawful business purposes;
- (h) to protect and promote the business of Freedom and its reputation in the market place;
- (i) to properly manage our business risks; and
- (j) safeguard the interests of our shareholders and to maximise the return on their investment.

These principles are entirely consistent with Freedom's vision and values.

### 3. POLICY

---

Freedom expects all employees in the course of their employment to conduct themselves in accordance with this Policy and to act in the best interests of Freedom in their dealings with other employees, customers, suppliers, shareholders and the public.

#### A. Performance of Duties

Employees have a responsibility to work in the best interests of Freedom, its customers and shareholders. Freedom expects that its employees in meeting the requirements of their respective role will:

- (a) perform their duties with due skill, care and diligence;
- (b) exercise their best judgement in the interests of Freedom and take responsibility for their decisions and actions;
- (c) exercise authorities responsibly and within their limits and make decisions that are procedurally fair and without bias using the best information available;
- (d) focus on achieving quality results and managing performance;
- (e) take responsibility for ensuring that Freedom's customers receive genuine value, excellent service and a positive and appropriate outcome;
- (f) maintain and develop knowledge in their professional fields and areas of responsibility;
- (g) base employment related decisions on merit and positive behaviours and not on attributes that are irrelevant to employment or performance; and
- (h) be fair and equitable in supervising and dealing with other employees and managing staff.

## **B. Working with Other Staff**

Employees must act professionally in all their interactions with other employees. This involves but is not limited to:

- (a) being respectful of the work environment and the rights of others;
- (b) acting in a socially acceptable manner towards others;
- (c) treating others with respect, courtesy, dignity and a level of sensitivity;
- (d) being honest, forthright and fair in your dealings with others; and
- (e) establishing cooperative workplace relationships based on support, consultation, communication and teamwork.

## **C. Diversity & Unacceptable Workplace Behavior**

Employees must be respectful of the dignity, rights, background and views of others in the workplace and must:

- (a) recognise, accept and respect the diverse backgrounds of their fellow employees;
- (b) not harass, victimise or discriminate another on the grounds of gender, sexual orientation, transgender status, race, colour, ethnic background, marital status, disability, age, political conviction, religious belief or other grounds covered by law;
- (c) not harass, bully or inappropriately intimidate others or otherwise constrain or interfere with the legitimate rights of others;
- (d) make themselves aware of the requirements of anti-discrimination, bullying, harassment and equal opportunity laws as they relate to the workplace and not breach their requirements; and
- (e) not use their status, power or authority for any improper or unlawful purpose.

Freedom has zero tolerance for conduct that is contrary to these requirements.

## **D. Safety in the Workplace**

All employees must contribute to promoting a safe working environment by taking responsibility for health and safety matters and must:

- (a) carry out their work in a safe manner and take reasonable precautions to protect the health, safety and welfare of themselves and other persons that they encounter in the course of their employment;
- (b) avoid behavior which might reasonably be perceived as creating an unsafe or unhealthy environment; and
- (c) report any safety issues to their manager or Freedom HR as soon as possible.

**E. Acting with Integrity and Managing Conflicts of Interest**

As a representative of Freedom, employees have the ability to build and maintain Freedom's good reputation or conversely to harm or undermine that reputation and the business' performance. Freedom expects employees to protect the good reputation of Freedom and to act professionally, honestly, ethically and with the upmost integrity in all business dealings. Without limitation, employees must:

- (a) never solicit any gift or benefit (including entertainment) for themselves or any other person in the course of their employment.
- (b) only accept a gifts or benefits in connection with their employment where permitted by applicable Freedom policies;
- (c) never accept a gift or benefit that may compromise them in the proper performance of their duties or otherwise create any obligation or expectation that preferential treatment will be given to the person or company offering the gift or benefit;
- (d) never try to improperly influence the outcome of an official decision by offering a gift or benefit that is not legitimately due;
- (e) disclose (and take all reasonable steps to avoid or address), any real or perceived conflict of interest which may impact on how they perform the duties of their employment. This will include disclosing their personal associations with any customer or supplier that the employee is dealing with in the course of their work;
- (f) make business decisions in the best interests of Freedom and its shareholders and not put their personal interests before those of Freedom, its customers or shareholders;
- (g) never improperly make use of their position, authorities or inside information for their own benefit. This includes never trading in securities if they have information that may affect the price of the security and this information is not publicly known or generally available;
- (h) ensuring that all dealings with customers, suppliers and third parties are properly recorded and transparent; and

- (i) behave in a way that upholds the values and the integrity and good name of Freedom and avoid behavior which might reasonably be perceived as corrupt or which might reflect adversely on the reputation of Freedom.

#### **F. Privacy, Confidentiality & Publication of Information**

In the course of their work, employees may come across private and confidential information relating to Freedom, colleagues, customers, suppliers and other third parties. Misuse of confidential and private information can have severe commercial and reputational consequences for Freedom and can also greatly affect those whose information is misused.

Employees must respect the privacy of the information that we collect, use, store and disclose and must safeguard any personal information held by Freedom in accordance with our obligations under the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth).

Other than as required in the proper performance of their duties, employees must:

- (a) respect an individual's right to privacy and only collect, store, use and disclose personal information in accordance with Freedom's Privacy Policy and such other related policies issued by Freedom from time to time;
- (b) keep secure and maintain the confidentiality of:
  - the personal information of our employees, customers, suppliers and shareholders; and
  - any information about Freedom's business and any dealings that the employee has with any other employee, customer, supplier or shareholder;
- (c) never disclose any information about Freedom that is not already in the public domain without the proper authority to do so;
- (d) not share private or confidential information with:
  - other employees unless it is required to enable them to do their job; or
  - third parties outside Freedom unless it is a permitted disclosure; and
- (e) follow all protocols and procedures relating to the maintenance of computer systems, including passwords and user profile setup and never allow someone else to log on using their individual details.

## **G. Compliance with Laws and Regulatory Requirements**

Breaches of the law can have serious consequences for both Freedom and the employee responsible for the breach. It is therefore imperative that employees fully observe and comply with all applicable legislative, regulatory, industrial or administrative requirements that apply to Freedom's business.

In order to meet this requirement:

- (a) employees must never knowingly act contrary to these requirements nor help a customer or other person evade or break a law;
- (b) employees are expected to be familiar with all relevant laws and regulations in the locations where they work. Ignorance is no excuse and employees are ultimately responsible for understanding which laws and regulations apply to them and the work they do. Freedom will endeavour to provide its employees with guidance and training on such matters and will design systems and processes that comply with the law. In many cases, the standards expected by Freedom will exceed those required by law; and
- (c) employees must complete all required training and education programs to build and maintain their awareness and understanding of relevant laws, policies, procedures and practices and if they are unsure as to how any of these apply must seek guidance from their manager.

## **H. Other Policies and Instructions**

All employees must implement, observe and comply with:

- (a) the policies, procedures and rules of Freedom that are issued from time to time; and
- (b) any lawful and reasonable instruction of the Directors or senior management of Freedom or other persons in authority.

## **I. Company Property**

All employees are expected to treat the property of the company with respect and care. Employees are responsible for the proper use of company property that is provided to assist them in the performance of their duties and must:

- (a) use the property appropriately and for proper business purposes;
- (b) comply with all conditions in connection with access and use of the property that are notified from time to time;
- (c) not misuse or damage the property; and
- (d) return company property at the conclusion of their employment.



Freedom funds and assets are to be used for proper business purposes and with prior authorisation. Accurate and transparent records of all usage, payments and receipts are to be kept. This applies particularly to the use of corporate credit cards, expenditure made on behalf of Freedom and for expenditure which the employee will be requesting reimbursement.

#### **J. Customers and Business Partners**

In dealing with Freedom's customers, suppliers and other business partners, employees are expected to:

- (a) act respectfully and responsibly towards our customers and strive to only offer products and services that are in their best interests;
- (b) provide information to our customers that is clear, accurate and relevant so as to ensure that they are enabled to make informed and beneficial decisions;
- (c) focus on achieving a quality outcome and experience for our customers that is in accordance with community standards and expectations;
- (d) to not intentionally target disadvantaged groups when offering our products and services and to avoid providing them to customers that don't require or can't afford them;
- (e) be client responsive and provide a prompt and efficient service to our customers and business partners;
- (f) deal with customers and our business partners in a professional, fair, honest, impartial and courteous manner and not act in a way that is contrary to community standards and expectations;
- (g) only provide advice that you are authorised and qualified to provide in the course of your work; and
- (h) otherwise act in accordance with the principles contained in this Policy that relate to the interaction with others in the workplace (see sections 3.B and C).

#### **K. Reporting Breaches and Misconduct**

Employees have an important ongoing responsibility to promptly report matters where they suspect any illegal, unethical, fraudulent or inappropriate behaviour in the workplace, whether by work colleagues, customers or other persons. This obligation extends to breaches or suspected breaches of Freedom policy or guidelines.

Reporting such matters should be made in accordance with the applicable Freedom policy. If an employee makes an intentionally false or malicious report, they may find themselves in breach of Freedom policy and will be subject to any consequences that follow.

All reports made will be taken seriously and Freedom undertakes to investigate all instances of misconduct and:

- (a) provided the report is made in good faith, employees will not be disadvantaged personally or subject to victimisation or retribution due to their reporting of the matter even if the conduct reported is later found not to be objectionable; and
- (b) all reports will be confidential and the identity of the employee reporting the matter will be protected to the extent reasonably possible in the circumstances.

#### **L. Securities Trading**

Freedom is committed to upholding fair and ethical securities trading practices complying with all laws and avoiding any conflicts of interest. Employees must familiarise themselves with the Company's securities trading policy.

#### **M. Public Communications & Disclosures**

Employees are responsible for the integrity of the information, reports and records under their control and are expected to exercise the highest standard of care in preparing materials for public communications. Freedom is committed to meeting its disclosure and communication obligations under the Corporations Act and the ASX Listing Rules and to keep the market fully informed of information that may have a material effect on the price or value of the Freedom's securities, and to correct any material mistake or misinformation in the market.

Media statements and official announcements may only be made by persons authorised to do so.

### **4. NONCOMPLIANCE & DISCIPLINARY ACTION**

---

Any employee failing to comply with the requirements of this Policy may be subject to disciplinary action. In extreme cases it may include the immediate termination of their employment and/or action being taken against the employee under applicable law or by concerned third parties.

If an infringement of this Policy occurs, employees are encouraged to report the incident to their manager in accordance with the Reporting Breaches and Misconduct Policy.

### **5. IMPLEMENTATION**

---

Managers are required to make their staff aware of the obligations contained in this Policy (including during induction). All employees are to be provided with access to a copy of this Policy and should ensure that they take the time to read and understand this Policy.

The responsibility for enforcing this Policy rests primarily with senior management. Individual employees are responsible for ensuring their own compliance with this Policy as it applies to them.

## 6. QUESTIONS

---

If any employee has any questions regarding this Policy, requires clarification or assistance or wishes to report a breach, they should raise this directly with their manager or Freedom HR.

## 7. RELATED POLICIES & EMPLOYMENT CONTRACTS

---

This Policy should be read in conjunction with each of the specific Freedom policies that relate to this subject matter. Should there be any inconsistencies between this Policy and the more specific policy, the more specific policy shall apply to the extent of the inconsistency.

Additionally, this Policy should be read subject to the terms contained in an employee's written contract of employment.