



## CODE OF CONDUCT

### **Income Asset Management Group Limited ACN 010 653 862 (IAM or Company)**

The Board is responsible for guiding and monitoring the Company which encompasses all the Group's wholly owned subsidiaries and controlled entities on behalf of shareholders by whom they are elected and to whom they are accountable.

The IAM Group consists of:

- Income Asset Management Group Limited ACN 010 653 862; and
- IAM Cash Markets Pty Ltd ACN 164 806 357.
- IAM Capital Markets Limited ACN 111 273 048;
- IAM Funds Pty Ltd ACN 643 600 088; and
- Trustees Australia Limited ACN 010 579 058.

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## INTRODUCTION

This Code of Conduct provides a framework for decisions and actions in relation to ethical conduct in employment. It underpins the Company's commitment to integrity and fair dealing in its business affairs and to a duty of care to all employees, clients, and stakeholders. The document sets out the principles covering appropriate conduct in a variety of contexts and outlines the minimum standard of behaviour expected from our employees.

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## ACCOUNTABILITIES

### **Managers and Supervisors**

Managers and supervisors are responsible and accountable for:

- (a) undertaking their duties and behaving in a manner that is consistent with the provisions of the Code of Conduct;



- (b) the effective implementation, promotion, and support of the Code of Conduct in their areas of responsibility; and
- (c) ensuring employees under their control understand and follow the provisions outlined in the Code of Conduct.

### **Employees**

All employees are responsible for:

- (a) undertaking their duties in a manner that is consistent with the provisions of the Code of Conduct;
- (b) reporting suspected corrupt conduct; and
- (c) reporting any departure from the Code of Conduct by themselves or others.

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## **PERSONAL AND PROFESSIONAL BEHAVIOUR**

### **When carrying out your duties, you should:**

- (a) behave honestly and with integrity and report other employees who are behaving dishonestly;
- (b) carry out your work with integrity and to a high standard and, commit to the Company's policy of producing quality goods and services;
- (c) Always operate within the law;
- (d) act in the best interests of the Company;
- (e) follow the policies of the Company; and
- (f) act in an appropriate business-like manner when representing the Company in public forums.

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## **CONFLICT OF INTEREST**

Potential for conflict of interest arises when it is likely that you could be influenced, or it could be perceived that you are influenced by a personal interest when carrying out your duties. Conflicts of interest that lead to biased decision making may constitute corrupt conduct.

Some situations that may give rise to a conflict of interest include situations where you have:

- (a) financial interests in a matter the Company deals with, or you are aware that your friends or relatives have a financial interest in the matter;
- (b) directorships/management of outside organisations;



- (c) personal relationships with people the Company is dealing with which go beyond the level of a professional working relationship;
- (d) secondary employment, business, commercial, or other activities outside of the workplace which impacts on your duty and obligations to the Company;
- (e) access to information that can be used for personal gain; and
- (f) been offered an inducement.

You may often be the only person aware of the potential for conflict. It is your responsibility to avoid any conflict from arising that could compromise your ability to perform your duties impartially. You must report any potential or actual conflicts of interest to your manager.

If you are uncertain whether a conflict exists, you should discuss that matter with your manager and attempt to resolve any conflicts that may exist.

You must not submit or accept any bribe, or other improper inducement. Any such inducements are to be reported to your manager.

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## **PUBLIC AND MEDIA COMMENT**

- (a) Individuals have a right to give their opinions on political and social issues in their private capacity as members of the community.
- (b) Employees must not make official comment on matters relating to the Company unless they are:
  - (c) authorised to do so by the Chief Executive Officer/Chief Commercial Officer; or
  - (d) giving evidence in court; or
  - (e) otherwise authorised or required to by law.
- (f) Employees must not release unpublished or privileged information unless they have the authority to do so from the Chief Executive Officer/Chief Commercial Officer.
- (g) The above restrictions apply except where prohibited by law, for example in relation to “whistleblowing”.

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## **USE OF COMPANY RESOURCES**

Requests to use Company resources outside core business time should be referred to management for approval.

If employees are authorised to use Company resources outside core business times, they must take responsibility for maintaining, replacing, and safeguarding the property and following any special directions or conditions that apply.



Employees using Company resources without obtaining prior approval could face disciplinary and/or criminal action. Company resources are not to be used for any private commercial purposes.

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### **SECURITY OF INFORMATION**

Employees are to make sure that confidential and sensitive information cannot be accessed by unauthorised persons. Sensitive material should be securely stored overnight or when unattended.

Employees must ensure that confidential information is only disclosed or discussed with people who are authorised to have access to it. It is considered a serious act of misconduct to deliberately release confidential documents or information to unauthorised persons and may result in disciplinary action.

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### **INTELLECTUAL PROPERTY/COPYRIGHT**

Intellectual property (including rights relating to scientific discoveries, industrial designs, trademarks, services marks, commercial names and designations, and inventions) is valuable to the Company.

The Company is the owner of intellectual property created by employees in the course of their employment unless a specific prior agreement has been made. Employees must obtain written permission to use any such intellectual property from the Chief Executive Officer/ Chief Commercial Officer before making any use of that property for purpose other than as required in their role as employees.

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### **DISCRIMINATION AND HARASSMENT**

Employees must not harass, discriminate, or support others who harass and discriminate against colleagues or members of the public on the grounds of gender, pregnancy, marital status, age, race (including their colour, nationality, descent, ethnic or religious background), physical or intellectual impairment or sexual orientation.

Such harassment or discrimination may constitute an offence under legislation. The Company is an equal opportunity employer and managers must implement hiring procedures accordingly.

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### **CORRUPT CONDUCT**

Corrupt conduct involves the dishonest or partial use of power or position which results in



one person/group being advantaged over another. Corruption can take many forms including, but not limited to:

- (a) official misconduct;
- (b) bribery and blackmail;
- (c) unauthorised use of confidential information;
- (d) fraud; and
- (e) theft.

Corrupt conduct will not be tolerated by the Company. Disciplinary action up to and including dismissal will be taken in the event of any employee participating in corrupt conduct.

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## **OCCUPATIONAL HEALTH AND SAFETY**

It is the responsibility of all employees to act in accordance with occupational health and safety legislation, regulations, and policies applicable to their respective organisations and to use security and safety equipment provided.

Specifically, all employees are responsible for safety in their work area by:

- (a) following the safety and security directives of management;
- (b) advising management of areas where there is a potential problem in safety and reporting suspicious occurrences; and
- (c) minimising risks in the workplace.

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## **LEGISLATION**

It is essential that all employees comply with the laws and regulations of the States in which we operate. Violations of such laws may have serious consequences for the Company and any individuals concerned. Any known violation must be reported immediately to management.

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## **FAIR DEALING**

The Company aims to succeed through fair and honest competition and not through unethical or illegal business practices. Each employee must deal fairly with the Company's suppliers, customers, and other employees.



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## **INSIDER TRADING**

All employees must observe the Company's "Security Trading Policy". In conjunction with the legal prohibition on dealing in the Company's securities when in possession of unpublished price sensitive information, the Company has established specific time periods when Directors, management and employees are permitted to buy and sell the Company's securities.

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## **RESPONSIBILITIES TO INVESTORS**

The Company strives for full, fair, and accurate disclosure of financial and other information on a timely basis.

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## **BREACHES OF THE CODE OF CONDUCT**

Employees should note that breaches of certain sections of this Code of Conduct may be punishable under legislation.

Breaches of this Code of Conduct may lead to disciplinary action up to and including dismissal.

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## **REPORTING MATTERS OF CONCERN**

Employees are encouraged to raise any matters of concern in good faith with the head of their business unit or with the Chief Executive Officer, without fear of retribution.