

# CODE OF CONDUCT POLICY

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## 1 OVERVIEW

At Income Asset Management Group Limited ("**IAM Group**") ("**the Company**") we require that all of our employees conduct themselves according to the highest standards of ethics, integrity, and behaviour when dealing with our clients, colleagues, and other stakeholders. This includes, but is not necessarily limited to, full compliance with all legal obligations imposed by statute or any other source of law.

This Code establishes the standards of behaviour that must be met by all employees. Where these standards are not met, appropriate disciplinary action will be taken. In cases where the breach involves serious misconduct, this may result in summary dismissal. In cases where a breach of the policy involves a breach of any law, then the relevant government authorities or the police may be notified.

## 2 OPERATION

The purpose of this policy is to make it clear what the Company expects from employees, and employees are required to be familiar with and comply with the terms of this policy at all times. Failure to do so may result in disciplinary action, including potential termination of employment.

In so far as this policy imposes any obligations on the Company, those obligations are not contractual and do not give rise to any contractual rights. To the extent that this policy describes benefits and entitlements for employees, they are discretionary in nature and are also not intended to be contractual. The terms and conditions of employment that are intended to be contractual are in an employee's written employment contract.

The Company may unilaterally introduce, vary, remove, or replace this policy at any time.

### 3 STANDARD OF CONDUCT

The standards expected of employees include:

- Compliance with all Company and workplace policies, procedures, rules, regulations, and contracts;
- Compliance with all laws;
- Compliance with all reasonable and lawful instructions given by or on behalf of the Company;
- Devotion of the employee's entire time, attention, and skill during normal working hours and at other times as reasonably necessary for the employee to perform their duties;
- To be honest and fair in dealings with customers, clients, co-workers, Company management, and the general public, and to treat them with courtesy and respect;
- To be faithful and diligent and actively pursue the Company's best interests at all times;
- To work in a safe and compliant manner and to observe all workplace health and safety rules and responsibilities;
- Refraining from any discriminatory, bullying, or harassing behaviour toward customers, clients, co-workers, Company management, and the general public;
- To not make any statements to the media about the Company's business unless expressly authorised to do so by the Company (requests for media statements should be referred to the Chief Executive Officer/Chief Commercial Officer);
- To not make any statements about the Company on social media or any other public platform that may harm the Company's reputation;
- To not, in connection with the employee's employment, accept any financial or other benefit from any entity other than the Company – unless acceptance of such benefit is in accordance with the Company's other workplace policies or is otherwise disclosed to the Company and expressly permitted by the Company;
- To not engage in any employment or provide any services to any person or entity other than the Company, except with the Company's prior written consent;
- To not engage in any employment or provide any services to a supplier or competitor of the Company, except with the Company's prior written consent;
- Immediately disclosing any potential, perceived, or actual conflict of interest (whether direct or indirect) that may give rise to a conflict with the performance of the employee's obligations to the Company, or the Company's business, confidential information, or reputational interests. The Company may direct employees to take action to eliminate or reduce any such conflict, and employees must comply with such directions;
- To not engage in conduct, whether during or after work hours, that in the opinion of the Company causes damage or potential damage to the Company's property or reputation;
- To not use, or come to work while affected by use of prohibited drugs or alcohol;
- To not discriminate on the basis of personal characteristics including (but not limited to) sex, race, disability, pregnancy, age, marital status or sexual orientation;
- To ensure and maintain punctuality;
- To respect the Company's property;
- To dress in an appropriate manner and to ensure that appearance is presentable, clean, neat, and tidy;

- To not use Company internet to access and/or download sexually explicit material or other offensive material;
- To not use Company email to send sexually explicit or suggestive material, or other offensive or harassing material;
- To maintain both during employment and after termination of employment with the Company the confidentiality of any confidential information, records, or other materials acquired during the course of employment;
- At all times behave in a way that upholds the Company's core values and the integrity and good reputation of the Company;
- Reporting any conduct of other workplace participants which is in breach of any of the above, or potentially in breach of any of the above, without delay.

## 4 RESPONSIBILITIES

### **Compliance, monitoring and review**

It is the responsibility of the Employee to adhere to the Code of Conduct at all times while employed with IAM Group.

It is the responsibility of Management to respond to any complaints or queries regarding the Code of Conduct in a timely manner.

## 5 RELATED LEGISLATION AND DOCUMENTS

Employees are encouraged to read this policy in conjunction with other relevant Company policies, including:

- Workplace Anti-Bullying & Anti-Harassment Policy;
- Equal Employment Opportunity and Anti-Discrimination Policy.

## 6 FEEDBACK

IAM staff may provide feedback about this document by emailing [HR@incomeam.com](mailto:HR@incomeam.com).