

# Code of Conduct for Directors & Staff

## Adopted by the Board – November 2014

This Code of Conduct establishes ethical standard for the directors & staff of Prequin Securities Pty Limited. This code of conduct is designed to promote an environment of the highest ethical and corporate standards. The following principles govern our conduct:

### 1. Integrity, Honesty, Transparency and Respect

- Individuals will at all times act honestly and with integrity.
- Individuals will treat all people with respect and will not discriminate on the grounds of race, creed, sex, marital status, or disability or other grounds specified by law.
- Individuals will adopt at all times a culture of transparency so that all relevant information is available to interested parties.
- Individuals will ensure that statements and actions are made honestly and accurately, so that they may be relied upon.

### 2. Confidentiality of Information

- Individuals will at all time observe the Company's policy on privacy as set out in our privacy statement 'Privacy and Your Personal Information'.
- Individuals will ensure that all personal, confidential or commercially sensitive information relating to the Company, its clients and investors, staff and other third parties is not disclosed either inadvertently or deliberately, unless such disclosure is required by law.

- Individuals must not use information gained in the course of their employment or position with the Company for personal gain or to obtain a benefit for any other person or business.

### 3. Conflict of Interest

- Individuals must refrain from participating in any transaction that represents a conflict of interest or a potential conflict of interest.
- Individuals will immediately disclose any personal matter that may lead to an actual or perceived conflict of interest.
- Dealings will at all times be on an ‘arm’s length” basis.

### 4. Employment Practices

The Company will:

- Provide a workplace that is safe for employees and that complies with the spirit as well as the letter of workplace health and safety laws.
- Promote equal opportunity for all employees, at all levels of the Company, irrespective of colour, race, gender, age, ethnicity, or religious beliefs or other grounds specified by law.
- Provide opportunities for employee training and education.
- Not tolerate employees being under the influence of illegal drugs (or alcohol) whilst on Company premises or on Company business.
- Unless otherwise agreed in writing between the Company and the employee, expect employees to work exclusively for the Company (exclusion for non-executive directors).

### 5. Personal Dealings

- Individuals must not use the Company’s name or information gained in their employment or position with the Company to further any personal or business transaction by themselves or related parties.
- Individuals will at all times respect the property of the Company.

### 6. Gifts, Entertainment & Cash Payments

- Individuals must not use their position with the Company to seek personal gain from those doing business with or seeking to do business with the Company.
- Individuals must not accept or seek any cash payment from any person in connection with the Company’s business.

- Personal gifts over \$250 must never be accepted without the prior written consent of the Managing Director.
- Gifts over \$150 must be reported to the Company Secretary who is responsible for maintaining the Company gift register.
- Individuals must not accept or provide any entertainment or gifts that could reasonably be seen to be excessive, abnormal or designed to create an inappropriate relationship.

## 7. Abiding by the Law

Individuals will at all times abide by the law.