

The Way We Work Together Code of Conduct

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Netwealth Group Limited (Netwealth)

Approved and adopted by:

- Netwealth Group Limited (ABN 84 620 145 404) on 1 May 2024
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Dear Colleague,

Our success (**Netwealth Group, Netwealth, we, us, our**) is reflective of our most important assets; you. Our success is dependent on the knowledge, experience, and talent of our employees, the strength of our Executive and Management team, the quality of our business strategy, and our compliance with the highest standards of corporate conduct, ethics, and governance. We are constantly working to demonstrate our purpose and values to our employees, shareholders, clients, suppliers, and the broader community.

We follow a set of standards that emphasise our culture and encompass strong corporate governance, sound business practices and good ethical conduct. Please note Netwealth may amend or withdraw its policies or create new policies from time to time as it sees fit. Any individual changes to these policies agreed between the Netwealth Group and the employee should be documented by altering these policies and making them available on the company intranet site. Alterations should be announced to employees in writing. Such amendments may be necessary due to individual job requirements.

We ask our employees to familiarise yourself with this document so we can be proud of our individual and collective achievements, so we can work efficiently and safely together, and so we can ensure that the Netwealth Group maintains a reputation for the highest standards of business conduct, professionalism, and integrity.

We appreciate your support.

Yours sincerely,

Matt Heine
CEO & Managing Director (CEO)

About this Code

Contents

Document version control:	_____	1
1	Scope and Application _____	5
2	Corporate culture and values _____	8
3	Your Conduct & Obligations @ Work _____	10
4	Working at Netwealth _____	16
5	Be Well @ Netwealth _____	23
6	Corporate Sustainability @ Netwealth _____	29
7	Employee Acknowledgment _____	31

About this Code



1 Scope and Application

1.1 Purpose

The Netwealth Group operates in the highly regulated superannuation and investment sectors of the financial services industry. We are committed to the highest level of integrity and ethical standards in all business practices. Employees must conduct themselves in a manner consistent with current community and Netwealth Group standards, and in compliance with all relevant legislation.

The Code outlines how we expect our representatives to behave and conduct business in the workplace, as well as providing information for employees on how to perform their job and any discretionary benefits available to them. It also includes legal compliance and guidelines on appropriate ethical standards.

1.2 Scope of the Code

We regularly monitor and test our policies under this document to ensure our commitments remain relevant, effective, and consistent with our stakeholders' expectations. This Code expresses the core standards and obligations that, along with our purpose and values, drive our behaviours and aspirations. It also provides information to employees about how to perform their role and additional discretionary benefits that are available.

The Code applies to all Netwealth temporary employees, permanent employees, contractors, and Company Directors (collectively known as **Employees**). All Employees are expected to understand and apply the Code where appropriate.

1.3 Roles and responsibilities

The following table sets out the key roles and responsibilities for those involved in implementing and monitoring the Code.

Role	Responsibility
Audit, Risk and Compliance Committee (ARCC)	It is the ARCC's responsibility to: <ul style="list-style-type: none">Review and endorse the Code to the NSS Board for approval.
Chief People Officer	It is the responsibility of the Chief People Officer, supported by the People & Culture team to: <ul style="list-style-type: none">conduct preliminary investigations in relation to potential breaches of the Code;review and recommend updates of this Code and related policies as required;notify the CEO and Chief Risk Officer of material or potentially material investigations or breaches of the Code;collect the full and half year declarations from Employees that they confirm and acknowledge that they are familiar with, and have recently reviewed, the Code and other associated Netwealth Group standards and policies (on the Intranet); andconduct regular training on the Code for Employees.
Chief Risk Officer	It is the responsibility of the Chief Risk Officer, supported by the Legal, Risk and Compliance team to: <ul style="list-style-type: none">conduct preliminary investigations in relation to potential breaches of the Code; andnotify the CEO and Chief People Officer of material or potentially material investigations or breaches of the Code; and manage any breach of the Code and report the finding where material to the Compliance and Risk

Role	Responsibility
	Management Committee (CRMC), Audit and Risk Compliance Committee (ARCC) or Board, as appropriate.
Company Directors (Directors)	It is a Director's responsibility to: <ul style="list-style-type: none"> • comply with this Code; and subject to statutory duties to clients, act at all times in the best interests of the Netwealth Group, with strict integrity and according to legal and approved Netwealth Group business practices.
Compliance and Risk Management Committee (CRMC)	It is the CRMC's responsibility to: <ul style="list-style-type: none"> • Review and endorse the Code to the NWL, NIL and NGS Boards for approval.
Employee	It is the Employee's responsibility to: <ul style="list-style-type: none"> • comply with this Code; • subject to statutory duties to clients, act at all times in the best interests of the Netwealth Group, with strict integrity and according to legal and approved Netwealth Group business practices; • raise any concerns or issues with your Manager (or the CEO or a Director); and • complete the full and half year declarations where you will be asked to confirm and acknowledge that you are familiar with, and have recently read, this Code and other associated Netwealth Group standards and policies (on the Intranet).
Executive Team (Executive)	It is an Executive's responsibility to: <ul style="list-style-type: none"> • communicate this Code to their direct report Employees; • take a leadership role in observing and promoting the behaviour and standards in this Code and any related policies; and • take immediate action where an Employee reports a potential breach of this Code, by reporting the matter to Risk and Compliance.
Manager	It is a Manager's responsibility to: <ul style="list-style-type: none"> • communicate this Code to their direct report Employees; • take a leadership role in observing and promoting the behaviour and standards in this Code and any related policies; and • take immediate action where an Employee reports a potential breach of this Code, by reporting the matter to Risk and Compliance.
Netwealth Group Limited, Netwealth Investments Limited, Netwealth Group Services Pty Ltd and Netwealth Superannuation Services Pty Ltd Board(s) (the Boards)	It is the Board's responsibility to: <ul style="list-style-type: none"> • Review and approve the Code; and • Adhere to the Director responsibilities as outlined above and throughout this Code.
People and Corporate Sustainability Committee (PCSC)	It is the PCSC's responsibility to: <ul style="list-style-type: none"> • Review and endorse the Code to the NWL, NIL and NGS Boards for approval; • Take a leadership role in observing and promoting the behaviour and standards in this Code and any related policies; and • Take immediate action where an Employee reports a potential breach of this Code by reporting the matter to Risk and Compliance.

1.4 Breaches of this Code

a) Reporting Channels

You are encouraged to report to your Manager and Risk and Compliance any genuine behaviour or situation which you believe breaches, or potentially breaches, this Code, policies, or the law.

Alternatively, you can report unacceptable behaviour through People & Culture, Risk & Compliance, directly to the CEO, a Director, or in accordance with the Whistleblowing Policy (which includes the ability for you to remain anonymous).

b) Whistleblower Protection

We are committed to ensuring that you are not disadvantaged or discriminated against for reporting unacceptable behaviour in good faith. For full details, please see the Company's Whistleblowing Policy available on the Netwealth Group intranet or website.

c) Investigations

Preliminary investigations of potential breaches are investigated by Risk and Compliance and/or People & Culture.

If a breach of this Code is found to have occurred, a formal investigation process is administered in consultation with the supervisor or Manager of the person alleged to have breached the Code.

In the investigation process, all Employees are expected to cooperate.

1.5 Consequences of breaching this Code

We recognise that breaches of this Code may occur from time to time. We expect that any breach will be inadvertent and without intent; however, it should be clearly understood that any breach may result in disciplinary action.

Depending on the nature of the breach, disciplinary action may be imposed, ranging from counselling to dismissal or termination of the contract or engagement. We will act objectively and in accordance with any applicable provisions or requirements in law and an employment contract.

We reserve the right to inform the appropriate authorities where it is considered that there has been criminal activity or a breach of the law.

Our Culture
Our Purpose
Our Values



2 Corporate culture and values

We are a fast-growing financial services company focused on attracting talented, innovative, creative and team-orientated people. Netwealth has a clear set of organisational values and behaviours that guide the way Employees work together, communicate and live.

2.1 Our Purpose

Netwealth is driven by its purpose, which is to enable people to see wealth differently and discover a brighter future.

2.2 Our Values

Collaborative

- Consider others' priorities
- Share knowledge and help others
- Communicate effectively and respectfully

Agile

- Adapt to change
- Focus on agreed priorities
- Execute quickly and efficiently

Genuine

- Be open, honest and transparent
- Act with integrity and ensure compliance with regulations
- Demonstrate professionalism consistently

Optimistic

- Be positive
- Drive for solutions
- Demonstrate passion and pride in Netwealth

Curious

- Challenge assumptions
- Explore new possibilities
- Enthusiastically learn

Courageous

- Take action
- Overcome barriers
- Stand up for the right outcome

Visit our [Values](#) on the intranet for details of expected behaviours as demonstration of these values.

Your Conduct and Obligations @ Work



3 Your Conduct and Obligations @ Work

3.1 Confidentiality and Privacy

During your employment, you will have access to, and knowledge of, Confidential Information and Personal Information.

3.1.1 Definition of Confidential Information

Confidential Information means information belonging to, or in the possession of Netwealth, and which Netwealth regards as, or which by its nature is, confidential. It includes, but is not limited to, any business dealings, methodology, financial information, business and strategic plans, computer software and programs, Employee personal information, trade secrets, technology, marketing information, evaluations, supplier and customer information and any other information which is not available in the public domain.

3.1.2 Obligation to keep confidential

You must not, at any time, either during or after ceasing employment, use or disclose Confidential Information except as authorised, or required, in the legitimate performance of your duties, without the prior written approval of the Netwealth Group. If you are required by law to disclose Confidential Information you must, prior to making disclosure, inform the Netwealth Group of the requirement to disclose and co-operate with lawful attempts by the Netwealth Group to minimise or prevent disclosure.

You must take whatever measures are reasonably necessary to preserve the confidentiality of Confidential Information. You must immediately notify the Netwealth Group of any suspected breach or actual unauthorised use, copying, or disclosure of Confidential Information.

You must comply with any reasonable steps required by the Netwealth Group to protect Confidential Information, including providing an appropriate statutory declaration as requested.

Any confidentiality breaches will be treated seriously and will result in disciplinary action or may lead to the termination of your employment.

3.1.3 Privacy Policy

The Netwealth Group is committed to adhering to the Australian Privacy Principles under the *Privacy Act 1988 (Cth)* for its client's and Employee's personal information. Please refer to our Privacy Policy and Group Information Security Policy for more information.

Netwealth records telephone calls made to or by Netwealth agents to monitor quality of call handling, Employee training, verify agreements, add clarity to a dispute, and to protect Employees and clients from inappropriate behaviour.

3.1.4 Employee Personal Information

Collecting, Using, Disclosing and Protecting Employee Personal Information

For Employees, personal information is information or an opinion that identifies you. In relation to your employment with us, types of personal information we collect includes, but is not limited to, your name, address, email address, phone number, bank account, date of birth, emergency contact information, and tax file number (if you choose to disclose it). We also collect sensitive information where required and with your consent, which can include information such as health information, ethnicity or criminal record information. We collect your personal information for the primary purposes of assessing your employment application and, if employed, for maintaining necessary employment records to meet our obligations and providing Employee benefits and services to you (for example, income protection).

We may provide your personal information to third parties. The types of information required to help assess your suitability as a candidate for employment may include background checks and psychometric testing which are performed with your consent. Due to the nature of our business, ongoing background screening is required for all our Employees. We may be unable to proceed with your employment request if you are unable to supply information that we require.

We may also provide your personal information to the following third parties:

- Other financial services organisations, including banks and insurance companies;
- Your nominated complying superannuation fund, or our default fund where you have not made such a choice;
- Third party issuers, AFS Licensees and/or service providers where you have agreed to receive, or not opted-out of receiving, an Employee benefit or service;
- Our contractors and external service providers, for example, auditors, mail house, marketing, printers and technology service providers;
- Agents of Netwealth's listed company who are authorised to collect shareholding information (for example where you receive an Employee share offer);
- The Australian Taxation Office;

For the purposes of providing staff benefits, like Income Protection/Salary Continuance Plan (unless you have opted out of these types of benefits) and executing internal processes like engagement survey and performance review platforms (currently via Culture Amp)

While employed with us, the personal information we have collected from you is stored on our payroll system, our human resource information management systems, and in our Employee files. Restricted access to this information is available only to those supplier personnel and our internal personnel who require this information to fulfil their duties.

Information stored by you on Netwealth's servers, systems and email may be stored, monitored and retrieved by Netwealth. This enables Netwealth to adhere to security, investigate compliance with Netwealth's policies / laws applicable to Netwealth, and to comply with information requests from Regulators (if applicable).

If we are contacted by someone to verify your personal information (for example where you have asked a prospective new employer to assess an application to be employed by them, or to offer a Netwealth benefit, like Salary Continuance Plan), we would only do so, upon your prior written consent.

You may request access to, and to correct, the personal information we hold about you, and to make a complaint about the way we handle your personal information. Refer to our Privacy Policy for further information.

3.1.5 Netwealth Products and Services

Should you choose to open a Netwealth Product, (such as a Netwealth Superannuation Master Fund, or a Netwealth Wealth Accelerator Multi-Asset Portfolio Service account), your personal information will be collected and used in accordance with the relevant disclosure document and the Netwealth Privacy Policy.

Netwealth attempts to limit the access by other Employees to your personal information; however, we cannot avoid this altogether. Employees are not to look up another staff member's account without having an instruction from that staff member and the appropriate authority to make amendments (otherwise pass the instruction to a staff member who is authorised). Netwealth has granted a small number of senior Employees with access to transact and make amendments to your account in accordance with your instructions. Other Netwealth staff may inadvertently see your personal information during normal processing, for example, generating annual statements and providing reporting.

Personnel are not to access their own Netwealth Product account via internal system access (such as back-end administration systems) to either review or update their Netwealth Product account information. If you wish to do so, you must use your own client/investor login details (i.e. via the front-end portal that all non-employee platform clients use). If you require changes or access that is not available via the front-end portal, you must follow non-employee platform processes (such as using relevant forms published on the Netwealth website or by contacting Netwealth via phone or email).

Unauthorised access or modification to your own account, or unauthorised access, modification, use or disclosure of another staff member's account, will be treated seriously and may lead to disciplinary action.

3.1.6 Obligations relating to handling Personal Information

During your work you may have access to Personal Information, including the Personal Information of clients. Personal Information is defined under the *Privacy Act 1988 (Cth)* and includes sensitive information such as health information and government identifiers such as tax file numbers, Medicare numbers or drivers licence numbers.

You must ensure you:

- Only access Personal Information where necessary to perform your duties;
- Only retain or store Personal Information in accordance with Netwealth's policies and procedures; and
- Do not store Personal Information in emails, shared drives or personal drives.

3.2 Compliance with Laws and Regulations

You should be aware of, and comply with, your duties and obligations under all laws and regulations relating to your work.

We encourage you to:

- Actively understand the laws which affect or relate to the Netwealth Group's operations;
- Attend training presented by Risk and Compliance or other external service providers to maintain your knowledge and increase your awareness of applicable laws and regulations. This includes the obligations of the two licensed entities within the Netwealth Group – Netwealth Investments Limited (**NIL**) and Netwealth Superannuation Services Pty Ltd (**NSS**). These entities both have obligations according to the licences they hold (Responsible Entity and IDPS Operator for NIL, and superannuation trustee for NSS). NSS also has an overarching duty to act in the best financial interests of its superannuation members. As NSS has outsourced the administration of the superannuation fund to NIL, it is important that the work done on behalf of NSS is aligned to this duty; and
- Interpret the law in a way which reinforces the Netwealth Group's reputation for integrity and be aware of Netwealth's Fraud Policy and how it relates to internal and external fraud and protecting the interests of clients, Employees, partners, shareholders and third parties.

If you have a question as to whether particular laws apply or how they may be interpreted, please contact [Risk and Compliance](#).

3.2.1 Fair Trading and Dealing

We aim to maintain the highest standard of ethical behaviour in conducting business and to behave with integrity in all dealings with clients, shareholders, government, Employees, suppliers, and the community.

When dealing with others, you must:

- Perform your duties in a professional manner;
- Act with the utmost integrity and objectivity; and
- Strive at all times to enhance the Netwealth Group's reputation and performance.

You are encouraged to familiarise yourself with the legal requirements applying to fair trading and dealing, and to undertake training or attend seminars to develop and maintain your knowledge so that you can act in accordance with those requirements.

If you have a question or wish to report a breach of fair dealing requirements, please contact [Risk and Compliance](#).

3.2.2 Conflicts of Interest

You are responsible for notifying the Company of any conflicts of interest (actual or potential).

If you are concerned that you may have a conflict of interest, you should read and understand the requirements under Netwealth's Conflicts of Interest Policy which is located on the Intranet.

Where you have a conflict that cannot be reasonably managed such as a:

- Direct relationship (parent, child, spouse, or sibling) with a competitor, key supplier, managed account provider/Manager or key dealer/adviser account;
- Hold a role (advisory, casual, full time etc.) with a competitor or key account; and/or
- Hold a role as a financial adviser, fund Manager, insurance provider or any other investment operator;

we may not be able to offer you a role at Netwealth.

Please inform your hiring Manager as soon as possible if you have any concerns or to talk through any such potential conflicts.

3.2.3 Improper use or theft of Netwealth Group property, assets and email

You must not:

- Use Netwealth Group assets for any unlawful purpose or unauthorised personal benefit;
- Remove Netwealth Group property and documents from official premises without a good and proper reason. If required to be removed, they should be stored in a secure manner and covered by appropriate insurances; and
- Make improper disclosure, including inadvertent or careless disclosure, of competitive business strategies and plans, special methods of operation and other information that is of competitive value to the Netwealth Group. If you are unsure whether information is of a confidential nature, seek advice from your Executive and refer to the Netwealth Group's Continuous Disclosure Policy before disclosure.

You are encouraged to use common sense and observe standards of good taste regarding content and language when creating documents that may be retained by us or a third party. Our electronic communications systems should not be used to access or post material that violates our policies or any laws or regulations. Personal non-business use of our electronic communications systems must also be consistent with the Information Security Policy and Social Media Management Standard.

3.2.4 Public communications and disclosures

You are responsible for the integrity of the information, reports, and records under your control, and you are expected to exercise the highest standard of care in preparing materials for public communications.

Those documents and materials should:

- Comply with any applicable legal requirements;
- Fairly and accurately reflect the transactions or occurrences to which they relate;
- Not contain any false or intentionally misleading information, nor intentionally misclassify information;
- Be in reasonable detail and recorded in the proper account and in the proper accounting period; and
- Have appropriate approval as indicated in the Publicly Issued Document and Classification Policy.

Media statements and official announcements may only be made by persons authorised under the Board Delegation Policy. If you receive a request for information and you are not authorised to respond to the enquiry, refer the request to the appropriate person. You and your associated parties must not participate in public forum discussions (including internet-based forums) where the subject matter is related to the Netwealth Group, its competitors, or the industry in which we operate, unless you have approval in accordance with the Board Delegation Policy. Please read the Board Delegation Policy on in the intranet for further information.

We also have expectations of Employees who use social media for work and personal matters that relate to Netwealth, its products, peoples, competitors, and other business-related information. Please read the Group Social Media Management Standard on the intranet for further information.

3.2.5 Company reputation

Employees must not act in any way that could cause harm to the Netwealth Group's reputation or market position during or after their employment. Employees have a duty to act in a manner that merits the continued trust and confidence of the public.

3.2.6 Securities trading

We are committed to upholding fair and ethical securities trading practices complying with all laws and to avoid conflicts of interest.

You must not:

- Use any price sensitive information (which is not generally available to others) in deciding whether or not to buy or sell the Company's securities;
- Deal with the Company's securities when in possession of price sensitive information about the Company which has not been publicly disclosed; and
- Act contrary to the Netwealth Trading Policy (which provides guidance on when Employees are likely to possess price sensitive information).

You should familiarise yourself with the Netwealth Trading Policy on the intranet and ensure you act in accordance with it in conducting any dealing in the Company's securities.

3.2.7 Bribes, inducements, commissions, gifts and politics

You must not pay, or receive, any bribes, facilitation payments, inducements, or commissions (this includes any item intended to improperly obtain favourable treatment or avoid unfavourable circumstances).

You must not give, or receive, any unreasonable gifts or otherwise act in an unethical way. Remember that agreeing not to act may have the same ramifications as acting in an unethical way.

You may voluntarily participate in the political process as an individual. We ask that you do not engage in actions that could cause someone to believe that your actions reflect the views or position of the Netwealth Group, if that is not the case.

You may not use corporate funds for political purposes.

Refer to the Company's Anti-Bribery and Corruption Policy on the intranet for more information on anti-bribery, corruption, gifts, political donations, and charitable contributions.

Working @ Netwealth



4 Working at Netwealth

4.1 Hours of Work

Permanent Employees are required to work a 37.5-hour week, plus reasonable additional hours as required (i.e., travelling to and from clients is a required and expected part of the job for some roles).

In roles that are required to provide infrastructure or IT support, normal business hours may be extended. Any variations to these normal business hours for specific roles will be agreed with your Manager.

4.1.1 Breaks

Lunch break is for up to 1 hour per day. Employees may need to adjust the timing of their lunch hour from time to time to ensure adequate client service continues to be provided. Each Employee is entitled to one break of ten minutes for morning tea and afternoon tea, and tea and coffee facilities can be used throughout the day. More frequent breaks can only be had after consultation with your Manager and the time will need to be made up at the start or the end of the day.

4.1.2 Work outside normal business hours

From time to time, Netwealth may require some Employees to work outside normal business hours to meet specific business needs. This may mean working longer hours, or to work on public holidays or weekends. For example, Netwealth services all of Australia, so we may need to offer extended service hours to meet the needs of interstate intermediaries and clients where reasonably requested. If this is required of your role, your Manager will seek your availability to work.

Work outside normal business hours is defined as additional hours worked by an Employee, which has been requested by their Manager, to meet a business need and has been mutually agreed; it does not include additional hours worked at the Employee's discretion.

Please refer to Netwealth's Overtime Management Standard for specific details on overtime and when and how it is approved, paid and recorded.

4.2 Dress Code

Netwealth generally has a smart casual dress policy. Our dress code is an important reflection of who we are and how we are seen by clients. Employees should keep in mind that from time to time we have external guests attending our offices, and that our presentation should always be professional.

Employees are required to 'dress for your day', so if you are in the office meeting advisers, clients or external visitors, Netwealth expects you to dress appropriately in business attire. At other times, like working from home, you may wear casual clothing. Netwealth expects that you consider what is appropriate for your role. When in doubt, please discuss your proposed attire with your Manager.

4.3 Working with Family Members

Please refer to the Recruitment Management Standard for detailed information about Netwealth's view on hiring family members of current Employees, and what the notification requirements are. Note that this applies to all current and future Employees, and all existing relationships.

4.4 Performance and Feedback Cycle

All Employees participate in a performance cycle; it is a 12-month process used to measure Employee alignment against our values. Each value contains a set of behaviours that can be measured against day-to-day activities to determine how well Employees are performing. This cycle assists with supporting Netwealth's strategic objectives, and team and individual objectives, as well as to track development. For more information, please refer to the Netwealth Group Performance and Feedback Process (My Contribution @ Netwealth) document available on the intranet or contact P&C.

The Risk Gate Opener describes a series of risk control activities Netwealth Employees and Management must adhere to in order to be considered for annual remuneration review, including remuneration increases and payment of variable remuneration (if applicable). The Board may adjust variable components downwards, to zero if appropriate, in relation to relevant persons or classes of persons, if such adjustments are necessary:

- To protect the financial position of Netwealth or for the purposes of any other relevant prudential matter;
- Where the Employee has not passed the Risk Gater Opener; and
- To respond to significant unexpected or unintended consequences that were not foreseen when approving the performance remuneration.

4.5 Remuneration & Incentive Payments

Netwealth has a fixed and performance-based remuneration structure that is designed to promote and reward performance, while promoting Employee conduct that is consistent with Netwealth's values, the Board's risk appetite and the protection of the interests of stakeholders.

A review of Employee remuneration is conducted annually for all eligible Employees, in consideration of the above and market-based information and comparisons. From time-to-time incentive payments may be awarded to Employees at the discretion of the Board. These payments are awarded for exceptional performance and conduct.

For further information, please refer to the Group Remuneration Policy on the intranet.

4.6 Training and Education

Netwealth's strategy is to create a workplace in which our people are enabled to drive their own development, to take part in the right high-quality learning and development experiences and to contribute to our strategic objectives as an innovative financial services organisation.

This includes regulatory training, job-ready learning, professional development and support for further study as negotiated on an individual basis. Please refer to the Netwealth Group Learning & Development Management Standard on the Intranet for further information.

4.7 Leave

The Netwealth Group is guided by the National Employment Standards as part of the *Fair Work Act 2009* (Cth). We have a leave standard that is intended to be flexible to meet personal, family, work and community commitments, without compromising the achievement of the Netwealth Group's business objectives.

Netwealth Employees have access to a range of leave entitlements, which include:

- Annual Leave;
- Personal Leave;
- Carer's Leave;
- Compassionate Leave;
- Long Service Leave;
- Parental Leave;
- Community Service Leave;
- Study Leave;
- Flexible leave;
- Family and Domestic Violence Leave;
- Leave Without Pay; and
- Crisis Leave.

Please refer to the Netwealth Leave Management Standard for further information.

4.8 Flexible Working Arrangements

We recognise the need for Employees to have flexibility to maintain a work and personal balance, and that this can help Netwealth improve productivity and efficiency of business activities. Flexible Working Arrangements are available to all Employees and are agreed following consultation and a formal application suited to individual circumstances. Examples of flexible working includes changes to hours of work (e.g., changes to start and finish times), patterns of work (e.g., split shifts or job sharing) and/or locations of work (e.g., working from home).

For further information about remote working eligibility, such as how to apply and responsibilities of working flexibly, please refer to the Netwealth Group Flexible Working Arrangements Management Standard and the Working from Home Management Standard.

4.9 Ending Your Employment

4.9.1 Termination

When ending employment, Netwealth will provide the affected Employee with written notice of termination. This notice will include the day of termination. The minimum period of notice given will be aligned with the Employee's employment contract.

Netwealth may wish to make a payment in lieu of a notice period. This payment is made at the full pay rate as if the Employee had worked their minimum notice period, and may include earned incentive-based payments and bonuses, loading, monetary allowances, overtime or penalty rates, and any other separately identifiable amounts.

Employees are required to give written notice of their intention to leave employment. The minimum period of notice must be given. The minimum period of notice is contained in the employment contract.

If an Employee does not wish to work the minimum notice period and to leave early, they may negotiate this with their Manager. Netwealth will pay the Employee for the period of notice that has been worked but is not obligated to pay the full notice period if an Employee requests to reduce the notice period, or does not attend work as if employed, during this period.

Employees who are terminated because of serious misconduct are not entitled to any termination payment.

4.9.2 Redundancy

Termination of employment due to redundancy is a form of dismissal by the employer. It is an involuntary ending of an Employee's employment. Redundancy is usually caused by factors such as economic conditions, business performance, business efficiency, insolvency or bankruptcy, interstate relocation, reorganisation, or technological development. Generally, termination of employment due to redundancy occurs when:

- An employer has made a definite decision that the job the Employee has been doing is not required to be done by anyone; and
- The decision leads to the termination of the Employee's employment.

Netwealth executes termination by redundancy in accordance with the *Fair Work Act 2009* (Cth) (The Act). Where it has been decided to implement a major change that may result in redundancy Netwealth will engage in consultation with an Employee or group of Employees who are likely to be affected. During this consultation process redeployment options will be considered and offered. Where redeployment opportunities do not exist, affected Employees will receive a notice of termination of employment due to redundancy, and offered outplacement services.

Where redeployment is successful the affected Employee or Employee group will not be entitled to a redundancy payment (also known as severance payment).

Redundancy pay is paid to permanent Employees only, with more than 12 months of continuous service, and is calculated based on an Employee's continuous service with Netwealth. Continuous service excludes periods of unpaid leave.

The amount of redundancy payment is paid at the Employee's base pay rate for ordinary hours, excluding incentive-based payment and bonuses, loadings, monetary allowances, overtime or penalty rates, and any other separately identifiable amounts. The amount paid is in accordance with the Act.

Period of Continuous Service	Redundancy Pay
At least 1 year but less than 2 years	4 weeks
At least 2 years but less than 3 years	6 weeks
At least 3 years but less than 4 years	7 weeks
At least 4 years but less than 5 years	8 weeks
At least 5 years but less than 6 years	10 weeks
At least 6 years but less than 7 years	11 weeks
At least 7 years but less than 8 years	13 weeks
At least 8 years but less than 9 years	14 weeks
At least 9 years but less than 10 years	16 weeks
At least 10 years	12 weeks*

*There is a reduction in redundancy pay from 16 weeks to 12 weeks for Employees with at least 10 years continuous service.

4.10 Travel

The objectives of the Group Business Travel and Expense Management Statement is to ensure that:

- Business travel is conducted in an equitable manner for all Employees; and
- Travel expenditure is cost effective at all times for both the company and clients when travel expenses are to be passed on.

Please refer to the Group Business Travel and Expense Management available on the P&C intranet under Employee Resources for guidelines on business travel and incurring business expenditure. Included is information relating to car allowance and telecommunications expenses.

4.11 Timesheets

Certain Employees will be required to complete daily time sheets as a record of their hours spent at work. Those Employees who fall under this requirement will be contacted and advised about the process of completing the timesheets.

4.12 Payslips

All Employees are paid on or around the 15th of each month, or prior if it is not a business day or is a public holiday. Employees can access their payslips online via Elmo.

4.13 Superannuation

Netwealth has a default super fund which is Australian Super. If you do not nominate a fund, your super contributions will be paid to a staple fund provided to Netwealth by the ATO and the last option being the default fund. You may choose to have your employer contributions paid into the Netwealth Superannuation Master Fund or an alternate super fund of your choice. Netwealth does not provide advice in this regard.

For the avoidance of doubt, an Employee can elect to have their contributions (mandatory employer contributions and additional/voluntary contributions they request) paid into any complying super fund that they wish (whether an APRA regulated fund or retirement savings account or a self-managed super fund) and Netwealth will pay those contributions into that fund accordingly.

4.14 Netwealth Accounts

Any Employee who holds a Netwealth account (such as a Wealth Accelerator Multi-Asset Portfolio Service or Super Accelerator account) will have their ongoing monthly administration fee waived for as long as they are an Employee of the Netwealth Group. Further information is available on the intranet under the Netwealth Employee Benefits and Services document.

Note: If you have a Netwealth Superannuation Account, it is necessary that certain Netwealth Staff have access to your account to enable administration processing to occur. Therefore, they may have access to your personal data. Further information about your privacy is contained in Section 3.1.4.

4.15 Employee Benefits and Services

Netwealth offers a comprehensive range of benefits and services to our Employees.

Please refer to the Netwealth Employee Benefits and Services on the intranet page.

Be Well @ Work



5 Employment Practices

We are committed to:

- A safe and healthy workplace and culture;
- Equal employment opportunities;
- Compliance with the letter and spirit of a full range of fair employment practices and anti-discrimination laws;
- A workplace free from any kind of discrimination, harassment, or intimidation of Employees; and
- Fair and equitable appointment and development.

All Employees are expected to be familiar with the equal opportunity requirements set out in this Code and Netwealth Policies. We will promptly investigate all allegations of harassment, bullying, victimisation, or discrimination and will take appropriate corrective action. Retaliation against individuals for raising claims of harassment or discrimination will not be tolerated.

Netwealth also produces an annual Corporate Sustainability Report which outlines a number of diversity, talent, and wellbeing goals for the upcoming financial year. Please refer to this report on Netwealth's Shareholder information page for more information.

5.1 Workplace Health and Safety

Workplace health and safety (WHS) is an integral part of our business operations. We are committed to ensuring health and safety in our workplace, compliance with legislative requirements and current industry standards. All Employees have obligations to assist in ensuring that WHS requirements are followed and maintained at all times.

Included in WHS is Employee wellbeing. The psychosocial or psychological safety of Employees is an important part of our workplace culture. Creating a mentally healthy workplace helps Employees feel respected, supported, and have clarity of role and expectations.

If you have any concerns or wish to raise a workplace health and safety matter, please:

- Speak with your Manager or any member of the Executive team;
- Contact the People & Culture team; and/or
- Refer to the Workplace Health & Safety Committee.

For more information refer to the Work Health and Safety Policy on the intranet.

5.2 Equal Employment Opportunity

Equal employment opportunity or EEO, means the absence of discrimination or less favourable treatment in employment based on certain **"Personal Attributes"** (also referred to as Protected Attributes or Characteristics) including, but not limited to:

Age	Sex	Pregnancy or potential pregnancy
Race (defined as colour, descent or ancestry, nationality, ethnic origin, or ethno-religious origin)	Political belief or activity	Carer's responsibilities, including breastfeeding
Marital or relationship status	Religious belief or activity	Family responsibilities
Trade union activity or inactivity	Sexual orientation	Gender identity and/or expression, including transgender identity and intersex status

Physical features (e.g., height, weight, size, or other bodily characteristics)	Irrelevant criminal record	Impairment and disability (including physical, intellectual, psychiatric, sensory, neurological or learning disabilities)
Carrying a disease-bearing organism (e.g., the HIV virus)	Medical record	
Being associated with someone who has (or is imputed to have) any of the above attributes		

Refer to the [Fair Work Act](#) for the full list of Personal/Protected Attributes and our Anti-Discrimination and Harassment Policy on the intranet.

5.3 Respect in the workplace

All Employees should respect their colleagues and create a workplace free from any kind of discriminatory behavior, harassment or victimisation. Employees should conform with equal opportunity laws in all aspects of their work, from recruitment and performance evaluation to interpersonal relations.

Please refer to our Anti-Discrimination and Harassment Policy on the intranet for further information on respect in the workplace.

5.4 Family and Domestic Violence

Netwealth is committed to supporting victims of domestic violence, enabling them to continue to participate in the workplace and maintain their employment, by providing a broad range of support. Netwealth has no tolerance of domestic violence and therefore provides a framework to support affected Employees. All full time, part time and casual Employees are entitled to family and domestic violence leave. Leave is not accrued, and amounts replenish at the commencement of each 12-month period.

Please refer to the Netwealth Leave Management standard for more information.

5.5 Substance Abuse & Dependency

We will not tolerate substance abuse by any Employees at work and at external functions that occur during employment. If breached, disciplinary action will be taken which may lead to termination of employment.

5.6 Employee Assistance Programme

We offer you and your immediate family members access to a free confidential counselling service as part of our Employee Assistance Programme (EAP) offered by Exhale People.

All contact is confidential, and they can assist you with:

- Conflict Resolution;
- Learning skills to better handle conflict;
- Management coaching;
- Personal issues at home (including domestic violence or issues you, your partner, housemate or children may be facing);
- Mental health concerns; and
- Grief and bereavement.

They can be contacted on 1800 270 954 or <https://www.urspaceeap.com>

Corporate Sustainability @ Netwealth



6 Corporate Sustainability

We are a responsible corporate citizen and actively support the community and environment in which we live and work. Creating a positive impact (social and environmental) is one of our key goals in our Corporate Sustainability Framework. Within Netwealth's Corporate Sustainability Report, full details of Netwealth's goals for the next financial year are shared. This document can be found on Netwealth's Shareholder website.

Each Employee is expected to uphold the Netwealth Group's commitment to pursue good corporate citizenship while engaging in its corporate activity.

You must abide by all local laws and regulations and are expected to respect and care for the environments in which the Netwealth Group operates.

We support and encourage you to actively contribute to the needs of the community. Netwealth offers staff the opportunity to participate in one paid day of volunteering per year. Staff are encouraged to take advantage of this opportunity and to participate in the various fundraisers offered by the Netwealth Impact Committee.

More information on Netwealth's Corporate Sustainability Strategy including our commitment to our society and the environment is contained in Netwealth's Corporate Sustainability Report on the Netwealth Shareholder website.

Document Version Control Table

Version	Comment	Approver(s)	Date
V 1.0	<ul style="list-style-type: none">Inclusion of Document Control table	NWL, NIL, NGS Boards NSS Board	1 May 2024 29 May 2024*
V 2.0	<ul style="list-style-type: none">Annual review of TWWWT Code of Conduct	NWL, NIL, NGS Boards NSS Board	1 May 2024 29 May 2024*

* upcoming expected approval date.