



Sequoia Financial Group (SFG) CODE OF CONDUCT

1. Introduction

At Sequoia Financial 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 policy applies to all our employees regardless of employment agreement or rank.

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. Purpose

The purpose of this policy is to make it clear what Sequoia Financial Group expects from employees. Employees are required to be familiar with and comply with the terms of this policy at all times.

The Code does not attempt to provide an exhaustive list of what to do in all situations, instead it presents a broad framework of ethical conduct that you have an obligation to uphold.

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

3. Workplace Conduct

We are committed to eliminating all forms of unlawful discrimination, harassment, bullying and victimisation of persons in the workplace ('Unlawful Workplace Conduct') as well as other unacceptable conduct in the workplace. We are committed to creating and maintaining a workplace where you can work without fear of Unlawful Workplace Conduct impacting you. Unlawful Workplace Conduct applies to conduct:

- **In the workplace:** including working outside normal hours and working at other locations (including working from home);
- **During work activities:** including dealing with our clients; and
- **At work-related events:** including conferences, off sites, Christmas parties, business development activities and social functions.

All staff are required to observe the highest standards of ethics, integrity and behaviour during the course of their employment/contract with the Company. The standards expected of team members include:

- comply with all laws, company policies, procedures, rules, regulations and contracts;
- comply with all reasonable and legal instructions by the company;
- be honest and fair in dealings with customers, clients, suppliers, co-workers, company management and the general public;

- treat customers, client, suppliers, co-workers, company management and the general public in a non-discriminatory manner with proper regard for their right and dignity;
- promptly report any violation of law, ethical principles or policies that come to your attention;
- maintain punctuality and attend the offices when required;
- observe health and safety policies and obligations;
- respect the company's ownership of all company funds, equipment, supplies, books, records and property;
- maintain during employment with the company and after the termination of employment, the confidentiality of any confidential information, records or other materials acquired during the course of employment with Sequoia Financial Group;
- while employed at the Company, do not accept any employment with another organisation that is a supplier or competitor of the Company, or any other employment that is in conflict with your position at the Company;
- dress in an appropriate manner and ensure that your appearance is presentable, clean, neat and tidy;
- do not make any unauthorized statements to the media about the company's business (requests for media statements should be referred to you line manager);
- do not fight in the workplace;
- do not swear in the workplace;
- do not engage in sexual or other unlawful harassment or bullying in the workplace;
- do not consume or possess drugs in the workplace;
- do not consume alcohol in the workplace (unless for events organised by Sequoia Financial Group) or attend work under the influence of drugs or alcohol;
- empathy with corporate social responsibility; and
- empathy with environmental awareness.

In the event that you are involved in Unlawful Workplace Conduct or unacceptable conduct in the workplace, we may take disciplinary action which may include termination of your employment.

The laws governing Unlawful Workplace Conduct are different in each State and Territory of Australia. There are also separate Commonwealth laws (these laws are referred to as Equal Opportunity (EEO) legislation). However, the obligations set out apply to all SFG's workplaces in Australia, and to all locations from which you work (including working from home).

We all work in open plan office areas. It is important to be considerate of others, and so if someone seems disturbed, anxious, annoyed or affected in any way, try your best to accommodate them.

3.1 Respect in the workplace

All employees should respect their colleagues. We won't allow any kind of discriminatory behaviour, harassment or victimisation. Employees should conform with our equal opportunity policy in all aspects of their work, from recruitment and performance evaluation to interpersonal relations.

All employees must show integrity and professionalism in the workplace.

All employees should fulfill their job duties with integrity and respect toward customers, colleagues, internal and external stakeholders and the community. Supervisors and managers mustn't abuse their authority. We expect them to delegate duties to their team members taking into account their competences and workload. Likewise, we expect team members to

follow team leaders' instructions and complete their duties with skill and in a timely manner.

Employees should be friendly and collaborative. They should try not to disrupt the workplace or present obstacles to their colleagues' work.

3.2 Equal Opportunity

Equal employment opportunity or EEO, means the absence of discrimination or less favourable treatment in employment based on certain "Personal Attributes" 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		

3.3 Unlawful Discrimination

There are two types of unlawful discrimination in the workplace; direct or indirect discrimination. The fact that the discrimination is unintentional does not mean that it is not unlawful.

- **Unlawful discrimination** is prohibited by EEO legislation and will not be tolerated at SFG.
- **Indirect Discrimination** occurs when there is a requirement (a rule, policy, practice, procedure) that is the same for everyone, but it has a disproportionate effect or result on a person or a particular group of people.

Example: If we decided to hold weekly meetings at 7.00pm, this appears to be a neutral requirement that applies to everyone but could indirectly discriminate against those with family responsibilities because they may not be able, or less able to comply with the requirement to attend work until 7.00pm.

- **Direct Discrimination** occurs when a person is treated less favourably than another person

in the same or similar circumstances, because of or for reasons that include any of the Protected Attributes.

Example: If we decided not to employ anyone over 30 years of age, it would be direct discrimination on the basis of a Protected Attribute (age).

3.1 Unlawful Harassment

Under Federal and State legislation, unlawful harassment occurs when someone is made to feel intimidated, insulted or humiliated based on any of the Protected Attributes (their race, colour, national or ethnic origin; sex; disability; sexual preference; or some other characteristic specified under anti-discrimination or human rights legislation). It can also happen if someone is working in a 'hostile', or intimidating environment.

Unlawful harassment is prohibited by EEO legislation and will not be tolerated at SFG. Harassment can be the result of behaviour that is not intended to offend or harm, such as jokes, and the fact that it is unintentional does not mean that it is not unlawful.

3.2 Sexual Harassment

Sexual harassment is conduct which is:

- Is unwelcome
- Is sexual in nature; and
- A reasonable person, having regard to all of the circumstances, would anticipate the possibility that it would offend, humiliate or intimidate.

Sexual harassment is prohibited by EEO legislation and will not be tolerated at SFG. It does not matter that you did not mean or intend to sexually harass the other person.

Sexual harassment may involve any physical, visual, verbal or non-verbal conduct of a sexual nature including one off incident or a series of incidents. It may also involve acts using email, SMS, mobile phones cameras and social networking sites.

Sexual harassment may include, but is not limited to:

- Sexual jokes
- Offensive telephone calls
- Constant sexual innuendo or commentary on one's sexual orientation, gender, gender identity or expression
- Displays of pornographic pictures, reading matter or objects
- Offensive emails, screensavers, text messages or internet material
- Sexual propositions or persistent requests for dates, especially after prior refusal
- Physical contact such as patting, pinching, touching, kissing or hugging in a sexual way
- Unwelcome and uncalled for remarks, questions or insinuations about a person's sex/private life
- Suggestive comments about a person's appearance or body
- Leering, wolf whistles, catcall and obscene gestures
- Indecent exposure
- Sexual assault

Sexual harassment consists of unwelcome behaviour. Accordingly, when friendships or relationships develop between employees and are established with mutual consent, this is

unlikely to involve sexual harassment. However, such relationships should not be inconsistent with our expectation that everyone conducts themselves in a professional manner in the workplace.

3.3 Workplace Bullying

Workplace bullying occurs when:

- A person or a group of people repeatedly behaves unreasonably towards a person or a group of people at work; and
- The behaviour creates a risk to health and safety

Repeated means persistent or ongoing behaviour. It can involve a range of behaviours over time.

Unreasonable behaviour means behaviour that a reasonable person, having regard to the circumstances, would see as unreasonable, including behaviour that is victimising, humiliating, intimidating or threatening.

Workplace bullying is prohibited by EEO legislation and will not be tolerated at SFG.

Workplace bullying may include, but is not limited to:

- Aggressive or intimidating conduct
- Belittling or humiliating comments
- Spreading malicious rumours
- Teasing, practical jokes or initiation ceremonies
- Exclusion from work-related events
- Unreasonable work expectations, including too much or too little work, or work below or beyond a worker's skill level
- Displaying offensive material; and
- Pressure to behave in an inappropriate manner

However, this behaviour must be repeated and unreasonable and must create a risk to health and safety in order for it to be bullying.

3.4 Unacceptable Behaviour

Other unacceptable conduct, which does not amount to Unlawful Workplace Conduct, is also prohibited in the workplace. This includes but is not limited to offensive, belittling, abusive or threatening conduct and false, frivolous and/or vexatious complaints.

Inaccurate, vague, misleading, malicious or false accusations can have negative consequences for those involved. If you make such a complaint in bad faith (e.g. making up a complaint to get someone else in trouble) disciplinary action will be taken, which may include termination of your employment.

3.5 Liability for Unlawful Workplace Conduct

- **As an employee**, you can be held legally liable for Unlawful Workplace Conduct under EEO legislation; in other words, legal action can be taken against you personally if you engage in Unlawful Workplace Conduct e.g. sexual harassment.
- **Managers** can also be held legally liable for Unlawful Workplace Conduct in certain circumstances for the unlawful actions of their team members if they “condone” or permit unacceptable behaviours.
- **As an employer**, we can be vicariously liable (that is, held legally responsible) for Unlawful Workplace Conduct of our employees.

4. Dress Code

Our dress code is an important reflection of who we are and how we are seen by customers. You are to adhere to the code at all times.

SFG generally has a smart casual dress policy. However, employees are required to dress for their day. If you are meeting clients or external visitors, Sequoia expects you to dress appropriately in business attire. 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.

At other times you may wear smart casual. Sequoia expects that you consider what is appropriate for your role and where in doubt you discuss your proposed attire with your manager.

Smart Casual

For men, smart casual can include wearing a pair of pants, jeans or smart shorts paired with a collared shirt. Collarless shirts, sleeveless shirts, board shorts, tracksuits (pants and/or tops), active wear, and garments with slogans that may be found rude or abusive are not to be worn. Shoes should be smart and fully enclosed (no sandals or thong type footwear). Sneakers which are dirty, scruffy or torn should not be worn.

For women, smart casual includes smart dresses, skirts, pants, jeans, shirts and tops. Women may wear sandals, but these must have a back strap or support (no thong type footwear). Sporting attire, active wear, tracksuits (pants or tops) and garments with slogans that may be found rude or offensive are not to be worn. Sneakers which are dirty, scruffy or torn should not be worn.

SFG supports employees being active, and as such allows employees to relax the dress code prior to and after standard working hours. In addition, employees can also relax the dress code during their lunch break. At other times Sequoia expects the dress code to be observed. If an employee is in breach of the dress code, the employee’s manager, executive manager or either Human Resources may ask you to change your clothes.

Failure to adhere to the dress code could lead to disciplinary action.

5. How do you raise a Workplace Issue?

If you have a concern about Unlawful Workplace or Unacceptable Conduct you should raise the concern as per the below process:

1. Speak with the person (if possible)
2. Speak with your manager
3. Raise with the Human Resources

Alternatively, you may elect to raise your issue via other avenues highlighted in **SFG's Whistleblowing Policy** (located on Employment Hero under Policies).

6. Responsibilities

Employees and contractors

1. Be aware of and comply with the Code of Conduct.
2. Report behaviour that may be contrary to the Code of Conduct and required standards of behaviour.
3. Role model the required behaviours and standards identified in the Code of Conduct.
4. Model our organisational values
5. Comply with mandatory reporting requirements, including but not limited to, mandatory reports of domestic and family violence, reportable incidents involving children and vulnerable people or other regulatory requirements.

Managers

1. Be aware of and comply with the Code of Conduct.
2. Role model the required behaviours and standards identified in the Code of Conduct including through the day-to-day management of staff.
3. Model our organisational values
4. Ensure all employees and contractors are aware of the conduct and behaviours expected of them as described in the Code of Conduct.
5. Ensure all employees and contractors have access to copies of the Code of Conduct and other relevant documents and policies.
6. Take appropriate steps to resolve conflict that arises in the workplace to ensure a healthy and harmonious work environment.
7. Take appropriate action to address breaches of the Code of Conduct by employees, volunteers or contractors.
8. Comply with mandatory reporting requirements, including but not limited to, mandatory reports of domestic and family violence, reportable incidents involving children and vulnerable people or other regulatory requirements.

Human Resources

1. Provide advice to managers and employees, in relation to the Code of Conduct and its application.
2. Role model the required behaviours and standards identified in the Code of Conduct.
3. Model our organisational values of Integrity, Respect, Compassion and Celebration.