



HUB24 Group  
Code of Conduct  
July 2024

## Overview

Purpose	The purpose of this policy is to outline the Group values and principles in which we expect our people to adhere to when performing their responsibilities.
Scope	HUB24 Group
Application	All HUB24 People
<b>Document Control</b>	
Executive Owner	Chief Executive Officer
Operational Owner	Chief People Officer
Policy Date	1 July 2024
Next Review Date	1 July 2026

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# 1. Overview

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## 1.1 Background & Purpose

- 1.1.1 HUB24 Limited (HUB24) is an ASX listed entity and the parent entity of the HUB24 Group of companies (HUB24 Group).
- 1.1.2 The HUB24 Group Code of Conduct outlines the Group values and principles which we expect our people to adhere to when performing their responsibilities.
- 1.1.3 HUB24 recognises the importance of conducting business ethically and fairly and is not prepared to compromise on its values, which guide us to make decisions based on what is lawful, ethical, fair, reasonable, and the right thing to do in a given situation.
- 1.1.4 HUB24 is also guided by regulatory bodies (including APRA, ASIC, ASX Corporate Governance Council etc).

## 1.2 Scope & Application

- 1.2.1 The Code of Conduct applies to the HUB24 Group including the subsidiaries and all of our directors, officers, employees, and contractors<sup>1</sup> (Our People).
- 1.2.2 HUB24 places great importance on trust and ethical conduct and expects Our People to follow the Code of Conduct in all dealings with each other, shareholders, customers, financial advisers, suppliers and regulatory bodies (Our Community).
- 1.2.3 The Code of Conduct outlines the minimum expectations regarding the conduct of Our People. HUB24 expects employees to 'do the right thing', being conscious of the impact of their individual behaviour on others and to seek advice where required to ensure appropriate conduct.

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<sup>1</sup> A reference to a 'contractor' in this policy means an individual who is contracted to work for the HUB24 Group for a minimum of two days per week for at least four weeks.

## 2. Policy Details

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### 2.1 HUB24 Group Values

- 2.1.1 Our values underpin a shared culture and govern our conduct when dealing with Our People, Our Community and other stakeholders.
- 2.1.2 Our People are expected to observe and behave in line with the HUB24 Group values, which are:
- **Enable our clients** - We succeed when we add value to our clients, partners and customers. We make it easier to access professional advice and empower better financial futures, together.
  - **Create possibilities** - We start with yes, explore new ways, and rethink how we can deliver smarter. With curiosity and discipline, we continuously pursue what could be and keep evolving.
  - **Succeed as one** - We're a high performing team that achieves more by leveraging our strengths and collaborating. We are better together.
  - **Deliver with integrity** - We take our responsibilities seriously. We bring energy, authenticity and focus for our clients, our industry, and each other.



**Enable**  
our clients



**Create**  
possibilities



**Succeed**  
as one



**Deliver**  
with integrity

## 2.2 Code of Conduct Principles

2.2.1 The following principles are outlined to guide the behaviour we expect of Our People, irrespective of their role, seniority, tenure or location:

- Uphold the values and protect the reputation of HUB24 by acting ethically and responsibly – ‘do the right thing’.
- Behave in a manner that demonstrates high personal integrity, honesty and trust.
- Act with professionalism, care and diligence.
- Treat colleagues with respect, courtesy and fairness, act inclusively with all people and not engage in bullying, harassment or discrimination.
- Deal with customers and suppliers fairly.
- Know and comply with laws and regulations that apply to HUB24 and its operations.
- Manage conflicts appropriately and with respect. Assume best intentions and seek to understand and respond positively to alternative views.
- Do not take advantage of the property or information of HUB24 or its customers to cause detriment to HUB24, its customers or Community.
- Do not use a HUB24 position, knowledge or opportunity to seek inappropriate advantage or personal gain.
- Speak up with confidence and report conduct that breaches this Code of Conduct.

## 2.3 Expected Conduct

### 2.3.1 Uphold the values and protect the reputation of HUB24, acting ethically and responsibly – ‘do the right thing’:

- Our brand and reputation are valuable assets and can erode swiftly and irrevocably where the conduct of Our People fails.
- We expect Our People to behave ethically and responsibly in performing their duties and in representing HUB24 more broadly.
- We expect Our People to uphold our values and use them to guide decision making.
- Where situations require Our People to exercise their judgement, we expect them to seek guidance if required through peers, People Leaders, responsible officers, or other appropriate functions (such as Risk & Compliance, Legal, People & Culture) and to apply the primary principle of ‘do the right thing’.

### 2.3.2 Behave in a manner that demonstrates high personal integrity, honesty and trust

- HUB24 is trusted with client personal and financial information – it is imperative that we protect this.
- Acting with integrity, honesty and trust is essential to the success of HUB24 and to the value we deliver to Our Community.
- Trust is earned when we act with honesty and integrity.
- We expect Our People to behave in a manner that demonstrates high standards of personal integrity, honesty and transparency, and to act responsibly in everything they do.

- Acting with honesty, integrity and transparency also applies to inaction (or what we fail to do), such as failure to report a conflict of interest or to report inappropriate conduct.

### 2.3.3 **Act with professionalism, care and diligence**

- We expect Our People to act with professionalism, care and diligence in performing their responsibilities.
- This includes ensuring accuracy of relevant information provided to assist the business in decision making processes, being diligent in all aspects of work, preserving and enhancing the reputation of HUB24, ensuring that applicable matters are referred to senior management and at all times acting in accordance with HUB24's values.
- We expect HUB24 products and services to be designed with high quality and integrity and to be delivered in a fair and transparent manner to our clients.
- HUB24 and its People must deliver products and services to Our Community in an appropriate manner and, while meeting our legal obligations, ensuring customer satisfaction remains a high priority.
- We expect Our People to recognise and adjust their approach based on who they are dealing with, whether a client, customer, representative, or other party.
- We expect Our People to show empathy and understanding to the particular circumstances of our customers, and assess whether they are vulnerable and if they require additional assistance or consideration.

### 2.3.4 **Treat colleagues with respect, courtesy and fairness, act inclusively with all people and not engage in bullying, harassment or discrimination**

- We expect our People to treat colleagues with respect, courtesy and fairness.
- We expect our employees to show empathy, consideration and kindness towards each other and act inclusively.
- We will not tolerate behaviours that amount to bullying, harassment or discrimination.
- HUB24 values differences and is committed to providing a diverse and inclusive workplace that is respectful of each others' differences and that supports the wellbeing of all of Our People.
- HUB24 is committed to ensuring the safety, security and physical and mental wellbeing of Our People, we expect all People to take reasonable care of themselves and their colleagues.

### 2.3.5 **Deal with customers and suppliers fairly**

- Our People are critical to achieving fair outcomes for our customer and suppliers.
- When making decisions, the impact on our customers and suppliers must be considered and our values must be applied.
- Where a course of action is lawful, Our People must also ask 'Is it fair?', 'are we doing the right thing?' and 'is this consistent with our values?'. If these questions cannot be answered positively, Our People should not proceed and should seek an alternative resolution, asking for guidance if unsure.

### 2.3.6 **Know and comply with laws and regulations that apply to HUB24 and its operations**

- HUB24 operates in a highly regulated environment and is required to comply with a number of laws, regulations and industry codes that regulate the way in which we must conduct our business. If we fail to meet these obligations, it can have serious consequences.
- Our People are expected to comply with applicable laws and regulations and to apply the spirit as well as the letter of those requirements.
- Applicable laws and regulations include (but are not limited to):
  - ASX listing rules
  - Financial services laws
  - ASIC instruments and policies
  - Privacy Act 1988 (Cth)
  - Anti-Money Laundering and Counter Terrorism Financing Act 2006 (Cth)
  - Employment and work health and safety laws and regulations
  - Tax Administration Act 1953 (Cth)
  - Modern Slavery Act 2018 (Cth)
- HUB24's Risk Management Framework, Compliance Framework, policies and training support Our People to understand and comply with our obligations under these applicable laws and regulations.
- Our People are also required to ensure they comply with all HUB24's policies and procedures for promoting cyber resilience – these policies and procedures are intended to protect HUB24, Our Community and Our People.

### 2.3.7 **Manage conflicts appropriately. Assume best intentions and seek to understand and respond positively to alternative views**

- Conflict of interests can arise where a personal or professional interest may actually conflict or could be perceived to conflict with a person's position, obligations, and responsibilities to HUB24, Our Community or other stakeholders.
- HUB24's corporate interests may also conflict or be perceived to conflict with the interest of Our Community and other stakeholders.
- HUB24 expects Our People to comply with the relevant policies governing conflicts of interest (including but not limited to Conflict of Interest Policy and Gift & Entertainment Policy).

### 2.3.8 **Do not take advantage of the property or information of HUB24 or its customers to cause detriment to HUB24, its customers or Community**

- HUB24 and Our Community entrusts Our People with personal and financial information.
- Our People must not take advantage of this trust to cause detriment to HUB24 or its Community.
- We expect Our People to:
  - Keep information confidential in accordance with the term of their employment contract and other policies (including but not limited to HUB24's Privacy Policy).
  - Comply with all Privacy laws and regulations regarding other people's personal information including ensuring its security and compliance with HUB24's Privacy Policy.



- Comply with all laws and regulations when holding or dealing with other people's money and assets.
- Acquire, maintain and use HUB24 property for legitimate and authorised purposes only and endeavour to protect HUB24's assets and property at all times.
- Adhere to policies and procedures promoting privacy, security and cyber resilience.

**2.3.9 Do not use a HUB24 position, knowledge or opportunity to seek inappropriate advantage or personal gain**

- Our People are prohibited from taking advantage of their position or the opportunities that can arise through their position for personal gain.

**2.3.10 Speak up and report conduct that breaches this Code of Conduct**

- HUB24 is committed to promoting and maintaining a culture that is compliant with relevant laws and regulations and is consistent with the company values and principles set out in this document.
- HUB24 expects its People to promptly and in good faith report any violation of this Code of Conduct (or any other unethical, unlawful, fraudulent or corrupt behaviour) of which they become aware or have reasonable grounds to suspect.
- It is critical that any matter of concern is identified and appropriately reported in order to be addressed.
- Depending on the circumstances or situation, the appropriate form of reporting may be to a People Leader, People & Culture representative or the Whistleblower Protection Officer.
- Where needed, the HUB24 Group Grievance Handling Policy or Whistleblower Policy may provide additional reference information.

### 3. Roles & Responsibilities

Role	Responsibilities
<b>Board</b>	<ul style="list-style-type: none"> <li>• HUB24 Limited Board is ultimately responsible for approving HUB24's Code of Conduct and its contents.</li> </ul>
<b>RNC</b>	<ul style="list-style-type: none"> <li>• Recommend this Code of Conduct to the Board for approval.</li> <li>• In order to assist the Board in discharging its responsibilities, the Board has established and delegated certain oversight functions to the Remuneration &amp; Nomination Committee (RNC) , including:               <ul style="list-style-type: none"> <li>○ Instilling and continually reinforcing a culture across the HUB24 Group of acting lawfully, ethically and responsibly; and</li> <li>○ Reviewing and making recommendations to the Board in relation to the Code.</li> </ul> </li> <li>• Reports are provided to the RNC and the Board on breaches of the Code of Conduct as part of the Incident and Breach Reporting processes.</li> </ul>
<b>Subsidiary Boards and Committees of the HUB24 Group</b>	<ul style="list-style-type: none"> <li>• Adoption of this Code of Conduct.</li> <li>•</li> </ul>
<b>Group Executive</b>	<ul style="list-style-type: none"> <li>• The Board has charged the Group Executive with the responsibility for inculcating our values across HUB24</li> <li>• Group Executives are accountable for:               <ul style="list-style-type: none"> <li>○ Continually reinforcing the values and principles in the Code of Conduct in their interactions with our People</li> <li>○ Ensuring all employees receive appropriate training on their obligations under the Code of Conduct</li> <li>○ Continually referencing and reinforcing those values in their interactions with our People (setting 'the tone from the top')</li> <li>○ Ensuring appropriate and proportionate disciplinary action is taken in relation to any breach of the Code of Conduct</li> </ul> </li> </ul>
<b>Our People</b>	<ul style="list-style-type: none"> <li>• All of our People are personally accountable for observing and aligning their behaviours to the Code of Conduct on a day to day basis</li> </ul>
<b>Chief People Officer</b>	<ul style="list-style-type: none"> <li>• Maintenance of this Code of Conduct (including approval of minor amendments from time to time).</li> </ul>

## 4. Definitions

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Term	Definition
<b>HUB24</b>	HUB24 Limited.
<b>HUB24 Group</b>	HUB24, the parent entity of the HUB24 Group of companies, and all of its subsidiaries.
<b>Board</b>	All Board members of HUB24 Limited
<b>Group Executive</b>	All direct reports of the Managing Director or as otherwise designated a Group Executive by the Managing Director.
<b>Management</b>	Group Executive and their direct reports.
<b>Our People</b>	All HUB24 Group directors, officers, executives, managers, employees, and contractors as well as subcontractors, distributors, and consultants who, as part of their engagement are required to carry out their duties on behalf of the HUB24 Group.
<b>People Leader</b>	Anyone within the HUB24 Group with direct report/s.
<b>People &amp; Culture</b>	Refers to the People & Culture (Human Resources) team within HUB24 Group.
<b>Code of Conduct</b>	This document.
<b>Subsidiaries</b>	Member entities of the HUB24 Group including its directors and employees.

## 5. Breach of Policy

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- 5.1 Failure to comply with this Policy is considered a serious matter and may result in disciplinary action against the individual involved. In instances of deliberate or reckless non-compliance, such measures may extend to termination of employment.
- 5.2 Additionally, breaches of this Code of Conduct may also result in investigations by the police or a regulatory body (eg ASIC) where conduct has been unlawful.
- 5.3 In the first instance, any concerns about compliance with this Code of Conduct can be raised with a People Leader or a People & Culture representative.
- 5.4 Potential or actual material breaches of obligations outlined in this Policy must be escalated according to the Group Incident & Breach Management Policy.

## 6. Policy Governance

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### 6.1 Review Cycle:

- 6.1.1 This Policy is reviewed every two years or more frequently if there is a significant change to the HUB24 strategy, operating environment or legislative updates.

### 6.2 Approval:

- 6.2.1 Minor amendments are approved by the Chief People Officer.
- 6.2.2 Major amendments are approved by the Chief Executive Officer and HUB24 Limited Board

**6.3 Exemption Authority:** Chief People Officer and Chief Executive Officer.

## 7. Relevant Documents

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- 7.1 HUB24 Group Whistleblower Policy
- 7.2 HUB24 Group Grievance Handling Policy
- 7.3 All other HUB24 Group Policies applicable to Our People