



Code of Conduct

2025

Our Values guide our actions and decisions, ensuring we deliver the best outcomes for our customers, partners, each other and for Latitude.

To be a successful business and maintain a winning culture at Latitude we must always act with integrity and be responsible, inclusive and respectful in everything we do. Living by our Values – Take Ownership, Pursue Excellence, Win Together, Create Tomorrow – will help us make the right decisions and contribute to a culture where growth, innovation, belonging and connection thrive.

This Code of Conduct is here to help you apply our Values so that your behaviours, decisions and actions ensure you make ethical and sound choices which uphold our brand and reputation and protect your integrity. We all have a role to play in building trust and transparency to deliver great outcomes for each other, our customers, our partners, and our communities that we can be proud of.

Our Culture & Values

Our Culture is the sum of us. It is embedded in our shared attitudes, beliefs, mindsets and values, and reinforced in how we make decisions. It guides how we communicate, how we behave and the behaviour we do not tolerate.



Our Values help us to navigate our complex world. They help us build trust and confidence, underpin our Culture, help us to deliver on our strategy and live our purpose

“There is no right way to do a wrong thing”

Kenneth Blanchard & Norman Vincent Peale, 'The Power'



Our Code of Conduct ('the Code') provides direction and guidance on what we need to actively consider when making decisions and how we should behave in different circumstances.

The Code helps us lead, navigate and problem solve through change, complexity, and ambiguity. It recognises that some decisions and choices are harder and more complex than others and may be challenged by conflicting expectations of stakeholders. It helps us to know that we are acting in the right way and making the right choices and decisions.

It embodies who we are, what we stand for, our beliefs, and our expectations of what is right or wrong, how we build trust and relationships, and how we conduct ourselves in the world to deliver consistently great outcomes.

The Code is underpinned by the following principles:

- ✓ being supportive, respectful, mindful, open, and transparent
- ✓ leading by example
- ✓ doing what is right by making decisions and acting in fair and honest ways
- ✓ empowering each other to speak up and raise concerns
- ✓ making things right if and when we get something wrong, and learning from our mistakes
- ✓ operating within the spirit, not just the letter, of the law and regulatory guidance
- ✓ designing and providing services and products that work and are in line with customers' needs
- ✓ undertaking all business activities with reasonable care and skill, including our engagement with partners and suppliers
- ✓ when acting for another, endeavouring to do so in their best interests based on the information available
- ✓ having no tolerance for deliberate, intentional and wilful misconduct

Speak Up

Each of us needs to have the courage to speak up when something's not right.

By speaking up, it means we are showing care and can address the problem together. Even if you don't have all the information or are not even sure that something is wrong, you should raise a concern; safe in the knowledge that it will be treated confidentially, with the utmost respect and fairly and quickly.

You might be uncomfortable or anxious but Latitude has zero tolerance for retaliation or retribution for anyone who raises a concern. You can feel safe in the knowledge that you will not suffer adverse consequences for:

- Refusing to do something that violates this Code of Conduct, Latitude's policies, or the law, even if your refusal results in the loss of business to Latitude.
- Raising a concern in good faith about potential misconduct.
- Cooperating with an investigation. Anyone who retaliates against an employee for engaging in any of these activities will be subject to disciplinary action, up to and including termination.

How to Speak Up

We want raising a concern to be easy and worry free, which is why there are several ways you can raise a concern at Latitude. To do this you can approach a Whistleblower Protection Officer, a Latitude Leader, HR, Compliance, Legal, Internal Audit or a Conduct Champion. If you are not comfortable with this, our intranet has contact details for YourCall, an external organisation engaged by Latitude, who will confidentially and, if you want, anonymously escalate your concern. In some circumstances, as explained in our Concern Raising (Whistleblower) Policy, there are others you can approach including a regulator or other external party.

Learn more on our [Latitude Policy Library](#):

- Concern Raising (Whistleblower) Policy

What to do if someone raises a concern

- ✓ Listen carefully and be fair, objective and impartial.
- ✓ Make sure the matter is captured correctly for tracking and reporting purposes.
- ✓ Ensure the matter is appropriately investigated.
- ✓ Provide the concern raiser with regular updates on the status of the investigation.
- ✓ Ensure corrective actions are implemented.

Helping Our Customers Shop & Live Better

Lend Responsibly

When making decisions, stop and ask yourself: Does this build trust or do harm to the customer now, or in the longer term? Our customers want to shop, pay in instalments and manage credit in a digital world. Our path to success is creating and providing responsible and sustainable payment, instalment and lending solutions and experiences that our customers love.

As a credit provider, Latitude will act efficiently, honestly and fairly, taking care with diligence and skill before and after providing credit to our customers. We provide accurate information about our products and ensure that they are responsible and 'not unsuitable' for our customers by understanding our customers' needs, their income, expenses and their capacity to borrow, in order to avoid harm to their financial well-being.

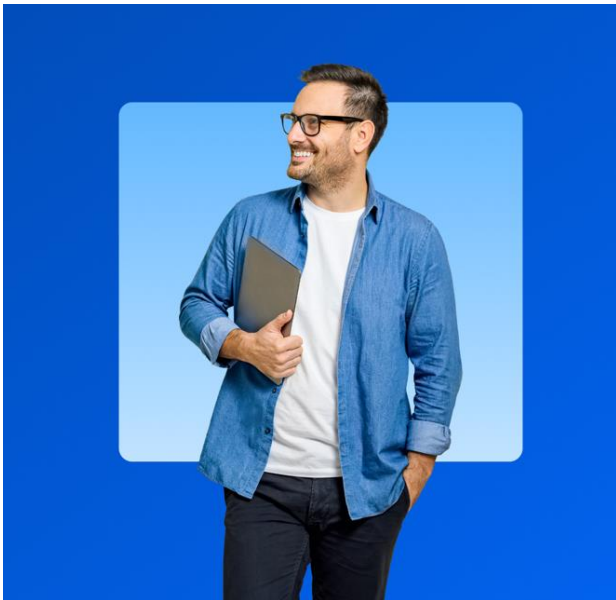
If we get things wrong, we commit to make things right. This may include changing the way we do things to stop errors from happening again, sharing lessons learnt with others to help them avoid the same mistakes, rectifying any harm that customers may have suffered.

These are some of the ways we lend responsibly:

- ✓ Clearly articulating to our people and partners our expectations on responsible lending.
- ✓ Prohibiting conduct and practices that lead to unsuitable credit products and credit limit increases.
- ✓ Reducing undesirable market practices, particularly where intermediaries are involved in lending.
- ✓ Gathering certain information about the consumer, by making reasonable inquiries and taking reasonable steps to verify the information obtained.
- ✓ Giving customers a written copy of their credit assessment (where applicable).

Learn more on our [Latitude Policy Library](#):

- Lending Responsibly Policy / Remediation Policy



Showing Care for Our Customers

Our conduct impacts customers. We constantly look for ways to engage with our customers, advocate for them and empower them to live better with good money habits.

- We show care in the way we co-design our customer experiences and products, and in the way we communicate with our customers, assess credit and lend responsibly – helping our customers to live better with better money habits.
- We show care in the way we support vulnerable customers and those experiencing hardship and, when things don't go to plan, how we manage customer complaints.
- Where customers experience hardship, we listen with empathy and tailor specific solutions for their individual circumstances to allow them to pay back the outstanding monies under terms which do not cause the customer further financial stress. In moments that matter, we show care by referring customers to the appropriate services to guide, support and educate them.
- We appreciate that things will not always go as planned, and even with the greatest care we will not get everything right 100% of the time. As such, Latitude is committed to having a consistent, transparent and effective complaints management framework. Through this framework, we will not only meet our regulatory requirements, but further enhance our customer experience.

Protect Privacy & Information

Our customers, partners and employees entrust us with their Personal Information in almost every interaction we have with them. Ensuring we comply with our privacy obligations will continue to ensure we maintain the trust and confidence of these groups. If you see or experience a privacy breach of the personal information we hold, it's important to raise a data privacy breach incident to ensure we mitigate any further risk of serious harm to the individuals impacted.

We're transparent about how we handle our customers' information. Because of this, our customers trust us to protect their privacy and use their data in the ways they permit us.

- We follow privacy and data protection laws.
- We provide clear and accurate privacy notices when collecting or processing personal data.
- We honour privacy choices by using customer data to provide the services customers have agreed to.
- We protect our customers' data by building secure products and services.

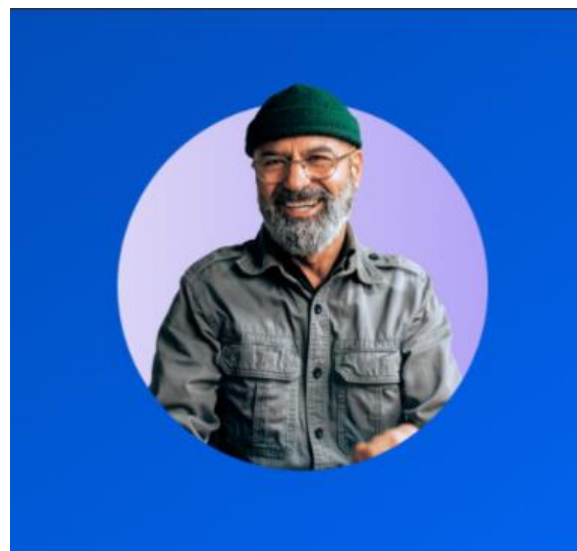
We are mindful of phishing attacks that ask us to click on links or request personal information. We lock computers and laptops when they are not in use, and we are mindful of who may see personal information when we are working away from the office. When employees leave Latitude, we ensure their access to systems and information is removed in a timely manner.

Learn more on our [Latitude Policy Library](#):

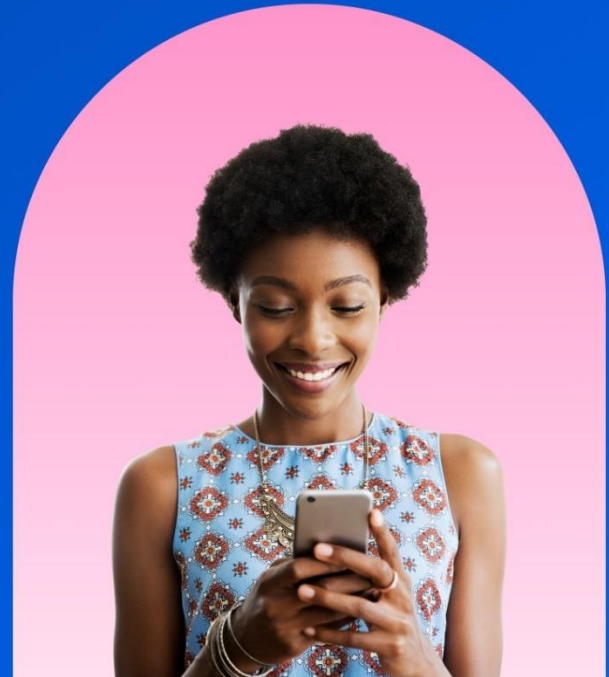
- Privacy Policy
- Records Management Policy
- Data Governance Policy
- Information Security Policy
- Acceptable Use Policy

Learn more on our [Latitude Policy Library](#):

- Customer, Family and Domestic Violence Policy
- Complaints Handling Policy
- Collections and Restructure Policy
- Vulnerable Customers Policy



Working with Our Partners



When making decisions, stop and ask yourself: Will this strengthen our long-term working relationship with our partners?

We hold ourselves to high standards of conduct and work with partners, retail merchants, brokers, consultants, suppliers and other companies who share our high standards of conduct.

We will not do business with others where we feel they do not meet our conduct-related expectations or may, by association, impact our reputation or compromise our own standards. We earn trust with our partners through returning value to them, by helping them win consumers and grow their business. We do not ask them to do anything that we would not do ourselves. We preserve our partners trust in us by protecting their information. We respect the confidentiality and intellectual property rights of others and do not use their confidential information without authorisation.

We show care for our partners when we:

- Communicate transparently and keep them informed on the things that matter to them and to us.
- Hold ourselves and others accountable to the commitments we make in a productive way.
- Respect difference in all its forms and demonstrate care, empathy, respect and inclusion in every interaction.
- Acknowledge the contributions of others and offer support to those that need it.
- Seek feedback in a way that helps us move forwards positively.
- Enter relationships and interactions with positive intent and assume this in others.

Learn more on our [Latitude Policy Library](#):

- Know Your Intermediaries Charter AU
- Know Your Intermediaries Charter NZ
- Records Management Policy
- Data Governance Policy
- Information Security Policy

Source Suppliers and Partners with Integrity

We only use honest and ethical suppliers and partners who commit to doing business ethically as their actions reflect on Latitude's brand and reputation as much as their own.

When they work with integrity, we retain and strengthen the trust with our customers, and with the community. We therefore, commit to forming partnerships in the right way and working with suppliers and partners who are fit for the job and share our beliefs as outlined in the Code.

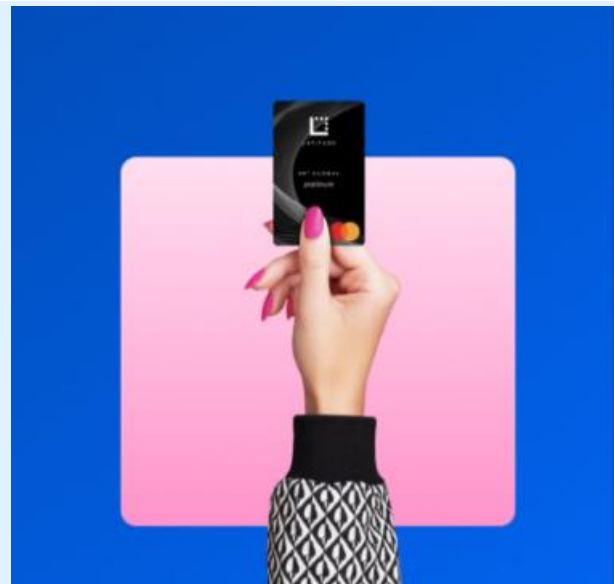
We rely on our supplier and partner relationships for our success and therefore need to know that they are as committed to building trust with our customers as we are and comply with the law. This includes working with us to mitigate the risk of exposure to modern slavery, forced labour and human trafficking at any point in our supply chain.

How we source suppliers with integrity:

- We understand our partners' qualifications and reputation before we start to work with them.
- Through following our procurement and contracting processes to onboard suppliers.
- We cultivate trust with our partners and never ask or suggest that they do things that are not allowed under the law or our policies.
- We ensure that our partners comply with global trade controls and economic sanctions that prohibit them from doing business with certain countries, governments, entities, and individuals.
- We do not pressure or incentivise partners or merchants to sell products, or features of products, that are not suitable for customers or that customers do not want or need.
- We report signs that a partner could be engaging in non-responsible lending practices or unethical behaviour.

Learn more on our [Latitude Policy Library](#):

- Procurement Policy
- [Modern Slavery Statement](#)
- Fraud Management Policy
- Financial Crimes Compliance Policy
- Conflicts of Interest Policy



Treat Gifts, Entertainment & Travel Responsibly

We develop positive relationships free of unprofessional, unethical and improper behaviour by treating the giving and receiving of gifts, entertainment and travel responsibly; we expect our partners to do the same.

Gifts, entertainment and travel can build strong working relationships and goodwill between Latitude and those we do business with. However, trust can be easily eroded. Our business and reputation can be harmed if we do not demonstrate sound judgement and moderation.

- We avoid extravagance, and non-legitimate or unreasonable reasons for entertaining, which could otherwise easily be perceived or considered as bribes, corruption or simply inappropriate.
- We are responsible with money. When incurring travel and expenses, employees should apply the principle of spending Latitude money as they would their own.

How to Treat Gifts, Entertainment & Travel Responsibly:

- Be clear on what constitutes acceptable and unacceptable gifts and entertainment and when we offer or accept gifts, entertainment or travel, we make sure they are reasonable, appropriate, and have a legitimate business purpose.
- Be sure to familiarise yourself with guidelines and limits on travel and expenses and spend Latitude money as if it were your own. By this we mean prudently, avoiding waste and abuse.
- Ensure all legitimate and appropriate gifts and entertainment that are given or received are declared and recorded in the Gifts and Entertainment Register.

Being a Partner with Our Community



When making decisions, stop and ask yourself: Does this foster trust with our community and our stakeholders, or does it harm our reputation? Our community and stakeholders expect us to be a good corporate citizen.

Our community consists of many stakeholders including the public, our customers, our partners, our investors, our regulators and the governments where we do business.

Our success depends on our community knowing we comply with the law and commit to being a responsible business in all our dealings and relationships. Including improving business practices, systems and controls to combat modern slavery, forced labour and human trafficking.

Across our value chain, we aim to ensure that we and our partners operate with respect for human rights and equality.

Helping Latitude to fight Financial Crime

Financial crimes such as tax evasion, fraud, drug trafficking, and terrorism financing can have serious impacts on the community. Our Financial Crimes Compliance Policy talks about what we must do to protect our customers and our business from being involved in financial crime related activities.

The pivotal role that we play in helping to ensure that we support the fight against financial crime and terrorism financing is to monitor customer and intermediary behaviour and transactions and report on anything suspicious. It is extremely important that you understand our processes to ensure you do not inadvertently enable a customer to commit financial crime. Doing so, even if inadvertently, can attract serious penalties for both the business and the individual concerned, such as fines and/or imprisonment.

Our shareholders must have confidence that we will create value for them in a responsible and sustainable way. We earn their trust by complying with the law, treating our customers fairly and responsibly and protecting our assets and information.

Respect and Promote Our World

We respect and promote our world when we:

- Uphold the Modern Slavery laws, respecting fundamental human rights and commit to being a responsible business in all our dealings.
- Protect people experiencing vulnerability in our communities.
- Understand our obligations to support the fight against financial crime and terrorism financing and monitoring customer behaviour and transactions, reporting on anything suspicious.
- Stand up for what we and the communities we work and live in believe to be important through our corporate social responsibility programs.
- Commit to reducing our carbon footprint and increasing our environmental sustainability.
- Hold ourselves accountable for complying with the law and make effective and ethical decisions.
- Do not participate in or help facilitate any form of bribery or corruption.

Learn more on our [Latitude Policy Library](#):

- [Modern Slavery Statement](#)
- Financial Crimes Compliance Policy
- Vulnerable Customers Policy
- Compliance Policy

Showing Care for Our Community

At Latitude we want to help everyone live better with good money habits and this extends well beyond our products and services to our partners in the community. Our corporate responsibility program has been shaped by Our Purpose and Values. Working in collaboration with our people we've designed a program that focuses on key initiatives across the countries we operate in to make a difference in the community:

- Our Workplace Giving program is a way for our people to donate to charities by making regular donations direct from their pay, matched dollar for dollar by Latitude. This means twice the benefit and impact for our charity partners and invites us to work as a team knowing that Workplace Giving has the potential to deliver better outcomes for those in the community.
- As part of our ongoing commitment to key local partnerships, we are strengthening our two long running and successful local partnerships, with Ardoch in Australia and Duffy Books in Homes in New Zealand. These partners focus on empowering our

communities and children through education. You can read more about

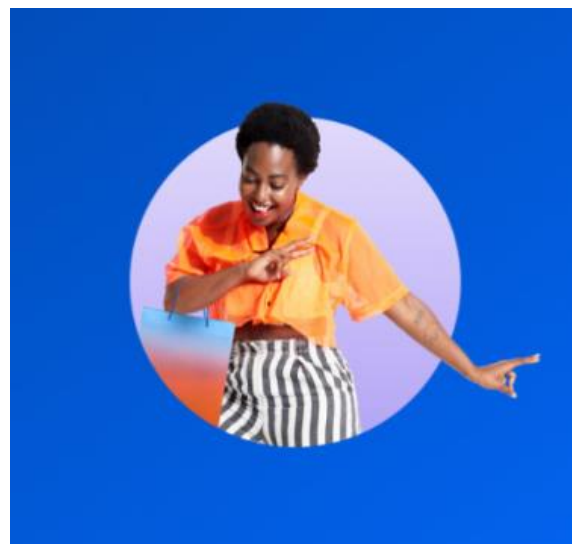
- our commitments in our first Better Together report.
- We provide volunteering leave and opportunities with our Latitude Giving partners, including the through our Ardoch Literacy Buddy program.
- We design products features to support accessibility to assist our customers with disabilities and help all people live better with good money habits. This includes customers with visual, learning, age-related, mobility, hearing and speech disabilities as well as those who live in remote regions and who may not have English as a first language.

How we show care to the community:

- Giving back to and advocating for the communities in which we live and work and help them to live better with better money habits.
- Communicating transparently and keep them informed on the things that matter to them and to us.
- Creating a diverse workforce reflective of our communities and respect difference in all its forms and show care, empathy, respect and inclusion in every interaction.
- Acknowledging contributions and offering support to those that need it, in particular those experiencing vulnerability.
- Holding ourselves accountable to the commitments we make in a productive way and seeking feedback in a way that helps us move our thinking and actioning forwards.
- Working with customer advocacy groups in the community to improve our customer experience, processes, systems and communication.

Learn more on our [Latitude Policy Library](#):

- Leave @ Latitude AU / Leave @ Latitude NZ
- Diversity Policy
- Workplace Giving program



Communicate Clearly & Accurately to the Public

- We are honest and transparent in our discussions with our regulators, industry bodies and government representatives and officials.
- We respond truthfully, appropriately and promptly to inquiries and requests for information.
- We comply with laws and industry codes that govern how our products may be distributed and used.
- We strive to ensure the information we share with our customers, the public and our stakeholders is honest and easy to understand, to gain and maintain their trust. They need to know that they can rely on what we tell them. We therefore listen carefully to all feedback and answer questions and complaints truthfully and swiftly.
- We do not speak on behalf of Latitude unless we are authorised to do so and always direct any media enquiries to Latitude's Corporate Affairs team.
- We understand the value in using social media to build more meaningful relationships with customers, communities and other relevant stakeholders.
- Where we promote or endorse our products using social media, we make our company affiliation clear and provide clear and factual information about the product.

If you are officially accredited to represent the Company in social media, or if you are discussing the Company or other business-related matters in your personal use of social media platforms, you must follow our social media policy.

Learn more on our [Latitude Policy Library](#):

- Social Media Policy
- External Stakeholder Engagement Standard
- Regulator Contact Standard
- Electronic Communications Policy

Helping Each Other Live Better

When making decisions, ask yourself:

- Does this show care and kindness and improve how we work together?
- Does this foster an inclusive culture that makes every employee feel welcome?

By asking more of ourselves, we create a community where we genuinely appreciate each other's value.

We are successful as a business when our people and teams collaborate to develop and shape an innovative technology business.



Foster Diversity, Inclusion & Belonging

Our people are central to our success and we are committed to a culture that fosters and promotes workplace diversity and inclusion, based on a foundation of mutual respect and open, honest and constructive engagement with one another.

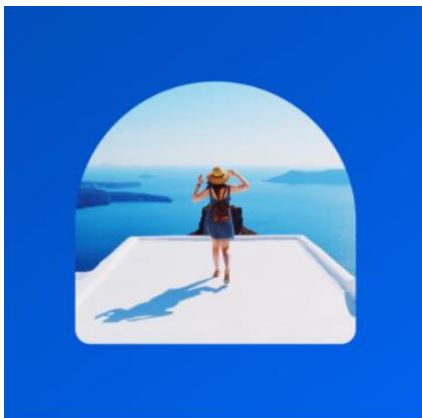
When we embrace our differences and enrich our culture through the diverse skills, experiences and backgrounds that each of us brings to Latitude, trust is strong and ideas and innovation truly flow. At Latitude, we believe in providing equal employment opportunities and examine our biases to avoid any discrimination based on disability, sex, sexual orientation, gender identity, intersex status, age, race, ethnicity, religion, culture, physical impairment, relationship and parental status, educational background, life and working experiences, carer responsibilities, socio-economic background and geographical location (or other legally defined attribute).

We foster diversity, inclusion & belonging by:

- Creating a diverse and aware workforce that truly understands and values difference, and a culture where all employees are respected and included.
- Committing and focus upon achieving gender representation and pay parity at all levels, including Board, Executive and Senior Management.
- Challenge and aim to remove bias from recruitment, promotion or performance practices, and remove barriers to participation which may disproportionately affect diverse candidates.
- Exploring how every role can be done flexibly, knowing the many ways that flexibility can be achieved so that all our employees can balance work and life, including those with caring responsibilities and other commitments.
- Fostering an environment where people speak up against any forms of discrimination or harassment. Understanding that discrimination, harassment, vilification, and victimisation simply isn't tolerated at Latitude.
- Identifying and implement programs to assist in the development of a broader and more diverse pool of skilled and experienced employees, and in inclusive leadership capability.

Learn more on our [Latitude Policy Library](#):

- Diversity Policy
- Workplace Behaviour Policy
- Talent Acquisition Policy



Show Care for Each Other

We want every employee at Latitude to feel they have the support to do their best work. Each of us can contribute to creating and maintaining a safe and productive workplace so that we can all thrive. At Latitude we treat each other with care and respect and behave in a way that upholds our Values.

- We treat all employees fairly and equitably with regards to their employment.
- We do not tolerate any form of discrimination, bullying or harassment, and we strive to provide safe environment and working conditions that help us all live better.
- We support the physical and psychological wellbeing of our People and in doing so, meet our duty of care and regulatory requirements. This includes supporting employees who may have experienced personal or work-related illness or injuries so they can make a full and safe return to work.

We Show Care for each other by:

- Showing care, kindness and compassion to each other, our customers, and our partners in all interactions.
- Taking time to share constructive feedback with team members and colleagues with the intent of helping to support and encourage continuous learning and growth.
- Encouraging our people to express ideas and opinions freely and respectfully. We believe that great ideas can come from anywhere and we are curious to hear them.
- Fostering a psychologically safe environment where people can feel free to speak up, and where all our people feel a strong sense of trust, connection and belonging.
- Acting right, taking accountability for our actions and calling out behaviour or risks when they do not feel aligned to our Values, create health and safety concerns for our people and/or could be considered unacceptable conduct. We resolve problems constructively, never resorting to threats or acts of violence.
- Supporting the physical and psychological wellbeing of our people and incorporating sound safety and health practices into our daily operations, complying with workplace health and safety regulations and meeting our duty of care. Understanding risks associated with the work our people do and aiming to minimise any adverse impacts associated with working at Latitude. Complying with our obligations and relevant legislative requirements, and your terms of employment.

We recognise and celebrate people who live our Values. We will not remunerate, incentivise or reward people, or our partners, in ways that do not support good conduct and doing the right thing.

Learn more on our [Latitude Policy Library](#):

- Workplace Behaviour Policy
- Managing Performance and Conduct Policy
- Drug & Alcohol Policy
- [Wellbeing Hub – including Employee Assistance Program \(EAP\)](#)
- Concern Raising (Whistleblowing) Policy
- Remuneration Policy

Act Right and Meet Your Responsibilities

We make and act on the right decisions for our teams, our work and for Latitude. This means we step outside what feels comfortable to stand up for what we believe in. We take this responsibility seriously and do the right thing, always.

While some of the areas in this section are covered elsewhere in the Code, in the context of how they apply to our customers, partners, the community and each other, in this section you'll learn more about your responsibilities to act in the interest of Latitude.

Avoid Conflicts of Interest

- We avoid conflicts of interest and act in the best interest of Latitude, avoiding situations where a personal relationship or financial interest might influence (or appear to influence) how we make decisions.
- We navigate perceived and actual potential conflicts of interest carefully, to avoid erosion of trust within teams and damage to the company's reputation.
- We disclose potential conflicts of interest and obtain advice and/or approval, to protect ourselves, our teams and Latitude.

This includes but is not limited to:

- Outside Employment – we do not take on work outside of Latitude before seeking permission and ensure the work does not harm Latitude's business interests or breach any employee agreements we have signed. This also includes work as a contractor.
- How we access and use systems – under no circumstances should we act on our own accounts or those of our family, friends or anyone known to us, where it could be reasonably perceived a conflict of interest could exist.

Meet our Compliance Requirements

Latitude is a licensed and/or authorised financial services provider undertaking consumer credit and securitisation activities. Consequently, Latitude is subject to a myriad of regulatory obligations.

The level of compliance risk Latitude is willing to accept is low. We must all be mindful of and understand our regulatory obligations as failure to meet them can result in regulatory sanctions, fines for Latitude and individuals and loss of licences to operate.

Fit & Proper Persons & Responsible Manager

People who are responsible for the management and control of Latitude and whose activities may materially impact our business and/or its financial standing, must meet a set of criteria including having appropriate skills, experience and knowledge, and being of good character.

Those in management positions at Latitude have a further responsibility to ensure their teams uphold our standards.

Uphold the confidentiality and security of information

- Caring for personal information in accordance with our requirements and notifying your leader of any suspected breaches of personal or confidential information or raise a data privacy breach incident.
- Upholding your contractual obligations, including responsibilities in your contracts of employment, even after an employment period ends.
- Not sharing private or confidential information with other employees unless they need it to perform their work at Latitude, or to persons outside of Latitude unless authorised to do so by the person who provided the information.
- Not using confidential information for personal gain
- Using secure facilities to store and/or dispose of confidential documents.

Contacting Information Security if you suspect or detect a breach of policy, material incidents or risks

Manage Operational Risk

Everyone at Latitude has a part to play in managing operational risk and a responsibility to report operational risk incidents they have identified.

It is important that you understand the operational risks our business faces resulting from:

- The processes we put in place for the business we undertake.
- The actions of our employees, partners and customers.
- The systems we implement.
- External events.

All employees have an obligation to identify, report and manage operational risk, including risk associates with financial crime, to protect our business from material financial and non-financial loss or reputation damage.

By managing risk, this enables us to anticipate things that can go wrong, minimise losses, develop best practice processes and controls, gain advantage over our competitors, and meet the expectations of our regulators.

Protect our Assets and Information

- We manage our company's resources prudently, avoiding waste and abuse, we talk about this as "treating it as if it were your own".
- We follow sound accounting practices, seek approval for non-standard terms of agreement or contracts and execute financial transactions only with appropriate authorisation and within financial delegation authorities.
- When we use the technology provided by Latitude, we exercise good judgement ensuring personal use aligns with our acceptable use policy, does not interfere with our job responsibilities or performance, and does not harm the organisation, including reputation or expose us to any cyber related threats.
- We understand that business data belongs to Latitude who has the right to access, preserve and review it in accordance with our policies and the law.
- We maintain our competitive advantage by protecting and respecting the value of our ideas, confidential information and all forms of intellectual property and innovation.
- We exercise care to avoid discussing confidential information in common or public spaces, or with colleagues and others who should not or do not need to know it. This confidentiality must be maintained even if we stop working for Latitude.



Records Management

- We keep accurate records and information to make sound business decisions, meet our regulatory obligations, deliver a strong customer experience and to provide clear financial results to our investors.
- When we send information and documents, internally or externally, we ensure that they are classified in the correct manner.
- Our documents create a record of our activities, and we must follow our document retention requirements to meet both our legal obligations and our long-term business needs.
- We must also ensure we dispose of any documents and data appropriately and within appropriate timeframes.

Learn more on our [Latitude Policy Library](#):

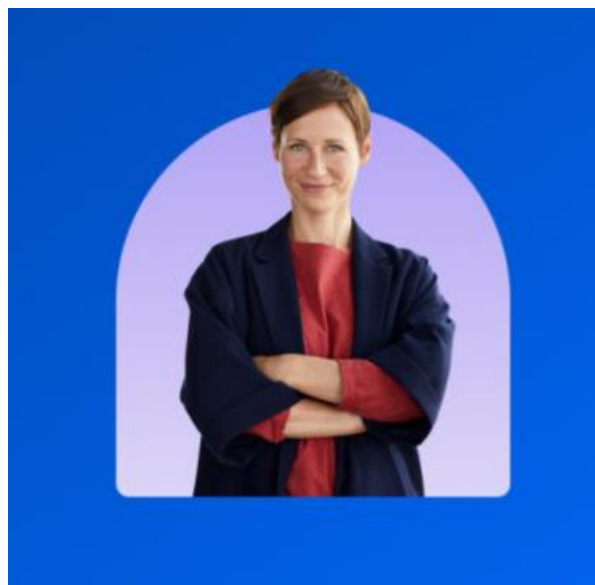
- Records Management Policy
- Acceptable Use Policy
- Compliance Policy
- Enterprise Risk Management Framework
- Conflict of Interest Policy
- Fit and Proper Policy
- Consequence Management Framework: Workplace Conduct & Behaviour

Your Responsibility

It is your responsibility as an employee or representative of Latitude to uphold the Code, act ethically and comply with all Latitude policies and the law.

This means you must:

- Read, understand, and comply with Latitude's Code of Conduct and the policies, laws and regulations that apply to your role.
- Speak up when you see possible violations of the Code of Conduct, Latitude policies and legal and regulatory requirements.
- Be truthful and cooperate fully in any internal investigations.
- Do not conceal or destroy information.
- Complete training on the Code of Conduct and all related policies and attest that you understand and commit to comply with the Code.



Failing to read or attest to this Code of Conduct does not excuse you from these responsibilities

Oversight

- Latitude's Code of Conduct and its Ethics Framework are endorsed by and have the full support of Latitude's Board of Directors.
- The Board of Directors and management is responsible for overseeing compliance with this Code of Conduct.

Applicability

- The Code applies to all employees, representatives, and activities of Latitude Group Holdings Limited, and their related bodies corporate ("Latitude").
- Throughout the Code we refer to these employees, representatives and those undertaking activities as 'our people' or 'employees'.

Enforcement

- This Code of Conduct is important to us.
- Violation of this Code of Conduct may result in disciplinary action, including termination of employment.

Supporting Documents

Policies referenced in the Code of Conduct can be found on the [Latitude Policy Library](#)

Policy Governance

The Code of Conduct is considered a Tier 1 policy, which means that all material changes made to the policy require LGHL Board approval.

The Code of Conduct will be reviewed at least annually. The CPO and EGM People & Culture is responsible for approving all non-material changes and recommending all material changes to the Board for approval.

The Latitude Enterprise Risk Management Committee will review and endorse all material changes made to this policy in the first instance. The Board is responsible for final review and approval.

The Board is required to review and approve this policy at least once every three years, irrespective of the materiality of the changes made.

Monitoring and Control

Management will be responsible for identifying any instances of non-compliance, actual or potential, under this Policy through (at least) annual self-assessments. All identified areas of non-compliance must be reported to the Board as soon as practical.

Revision History

Version	Approval Date	Changed By:	Summary of changes
1.0	22 May 2024	Chris Best Head of People Operations	Updating document formatting to match other policies, and condensing formatting to move from a 55-page document to 14 pages. Content remained unchanged except for minor changes to include clarity of language or remove duplication.
1.1	9 May 2025	Lee West General Manager Organisational Development & Sustainability	Non-material update to reflect new company Values and visual edits (photos/format).