

# Latitude Financial Services

# **Code of Conduct**



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# Letter from the CEO



**Ahmed Fahour**  
Managing Director  
& Chief Executive Officer

Team,

The strength of our culture is measured by how we treat each other, **our partners** and **our customers** and how we contribute to the community more broadly. 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 – Be Curious, Show Care, Act Right – 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 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.

**When we live by these principles we help our partners grow, people to shop and live better and build a culture that makes us proud.**

Thank you for the important role you play and taking your responsibility seriously.

Ahmed



# This is Us: Our Mission, Goals, Culture & Values



## Our Mission

Is to be the preferred Partners in Money.

## Our Goals

Our goal is to help businesses grow and people shop with interest free instalments and related lending and insurance.

Latitude was founded to help people buy the everyday household goods to support their lives. To enable them to live better, invest in themselves and their families, and sometimes to recover from setbacks.

Today, how people pay and use credit continues to evolve. At Latitude, we understand both our opportunity and our responsibility with credit to produce great outcomes for people and diminish harms. We value actions and conduct to align with acting right, being curious, and showing care.



# This is Us: Our Mission, Goals, Culture & Values



## 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 don't tolerate.

Our Values are what we hold to be important, they are the **principles that guide** our decision-making and our behaviour.

- 1 Act Right
- 2 Be Curious
- 3 Show Care

Our Values are the framework we use 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.



# Why do we need a Code of Conduct?



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

Latitude's [Conduct Policy](#) provides a framework for how Latitude will manage conduct and the risks of misconduct. Our Code of Conduct ('the Code') helps bring the Conduct Policy to life by providing 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.



# Why do we need a Code of Conduct?



**Using Values to Guide Conduct.** A key part of our Code are our Values, these are your guiding principles when faced with opportunities and challenges.

## 1 Act Right



We take our responsibility seriously and step outside what feels comfortable to stand up for what we believe is fair and ethical. We commit to living by ethical principles and ensure our actions are consistent with our purpose. We believe that this will lead us to success in the long term, balancing the need for business results and caring about how we achieve these results.

- When something doesn't feel quite right, trust your instincts and pause.

## 2 Be Curious



Then: Ask questions that help you to make ethical decisions:

- Does your approach align with our Values and Purpose?
- Does your approach provide short term outcomes at a longer-term cost or harm?
- Does your approach meet not just the letter but also the spirit of our legal and regulatory obligations?
- Does your approach meet community expectations?

## 3 Show Care



Be kind to others, respect difference in all its forms and be considerate of broader perspectives and priorities.

Seek feedback on your actions and seek to understand how they impact others.



# Why do we need a Code of Conduct?



## 1 Act Right



Each of us contributes to our culture in the way we interact and **make ethical decisions** to **build mutual trust**. Here's what you can do to build a culture of doing the right thing, together:

If you're a people leader:

- Set the expectation that we all need to **Act Right**.
- Lead by example in the way that you make decisions and behave.
- Be clear that *how* results are achieved is as important as *what* is achieved.
- Provide support in creating a safe space where our people feel safe, respected and listened to, even when it's hard, and feel empowered to challenge and speak up.

Each of us needs to:

- Choose courage over comfort by facing difficult tasks and conversations rather than avoiding them.
- Consider our customer's needs and take ownership to get it right for them every time.
- Ask for help, admit when something isn't working and take accountability and action to make it right.
- Focus on getting the best possible outcome over just getting it done, even in times when it's not easy or comfortable.
- Make decisions that prioritise the sustainability of our business and customer outcomes, not just immediate needs.
- Create space for others and support them to act right, to ensure they feel safe to stand up.

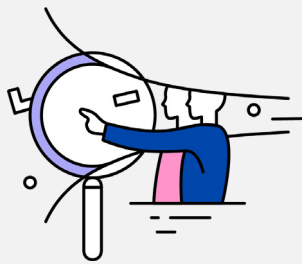




# Why do we need a Code of Conduct?



## 2 Be Curious



We can only create a culture based on ethical decisions and trust if we are **curious**, invite the views and feedback of others and take time for reflection. If we acknowledge that there is never a 'silver bullet solution' and that if we operate too quickly, we can do harm inadvertently, then we should stop and:

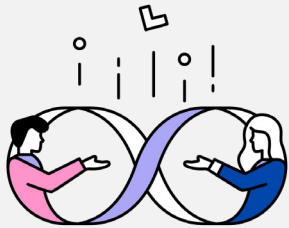
- Listen actively and openly, seek to understand, suspend judgement and encourage others to share their opinions and ideas.
- Ask "What if?", experiment with ideas and explore possibilities when faced with opportunities or challenges.
- Seek feedback and reflect to identify what needs to be unlearned as well as learned.
- Be inquisitive and seek to know more about our customers, partners, communities and the world.



# Why do we need a Code of Conduct?



## 3 Show Care



By thinking and acting as a team, listening, sharing and valuing difference, we **show care**. Trust is built when we face into tough conversations, invite others' opinions and beliefs before making a decision and sharing our views with kindness and respectful honesty.

We all need to:

- Communicate transparently and keep our people informed, empowering teams through clarity and accountability. Hold ourselves and others accountable in a productive way.
- Respect difference in all its forms and take responsibility to create a caring, respectful, inclusive workplace.
- Find ways to acknowledge contributions and offer support to those that need it.
- Give and receive feedback in an open and constructive way that helps us move our thinking and action forward.
- Enter relationships and interactions with positive intent and assume this in others.



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 of 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 quickly.

If action is required, we'll take it.

We understand that you might be uncomfortable or anxious and we want you to know that, at Latitude, there is zero tolerance for retaliation. 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 Raise a Concern

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 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 and Whistleblower Policy](#), you can also approach a regulator or other external party.

Learn more:

- [Read our Concern Raising and Whistleblowing 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.

If you're a Conduct Champion you're someone that Latitude holds in high esteem, are respected by your colleagues and someone who is approachable and easy to talk to. You have a responsibility to listen, show care and act with empathy. Handling concerns raised appropriately is critical to preserve trust and protect Latitude.



Helping Our

# Customers Shop & Live Better



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, lending, and insurance solutions and experiences that our customers love.



# Lend Responsibly



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 in Australia and New Zealand.
- 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:

- [Responsible Lending Policy](#)
- [Remediation Framework Policy](#)





# Protect Privacy & Information

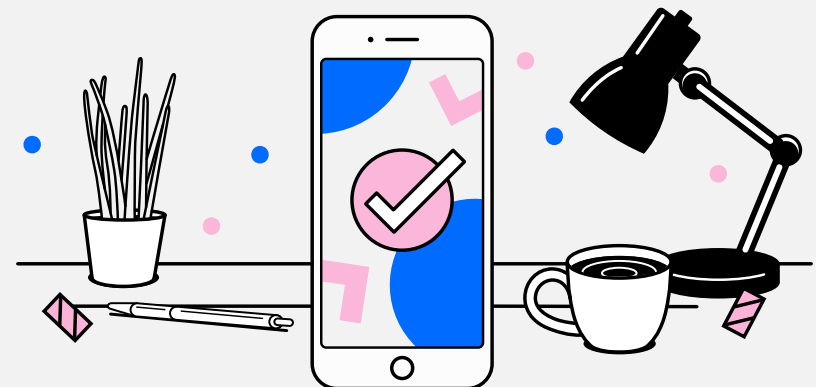


Our customers, partners and employees entrust us with their Personal Information in almost every interaction we have with them.

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.







## Protect Privacy & Information



**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.



## We Protect Privacy & Information when we:

Meet our obligations under the Privacy Acts (AU & NZ), and uphold the AU & NZ Privacy Principles, including transparency on our data handling practices as per the below:

- Detailing who we are and our contact details
- How we collect, use and disclosure Personal Information
- How Personal Information can be accessed or corrected
- Where Personal Information may be stored outside of Australia and New Zealand
- The steps we take to secure the Personal Information we hold and
- How to make a complaint around our handling of Personal Information

Learn more:

- [Privacy Policy ANZ \(under development\)](#)
- [Records Management Policy](#)
- [Data Governance Policy](#)
- [Information Security Policy](#)
- [Acceptable Use Policy](#)



# Showing Care for our 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, in the way we communicate with our customers and responsibly assess credit and lend – helping our customers to live better with better money habits.
- We also show care in the way we support vulnerable customers and those experiencing hardship, and when things don't always 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.

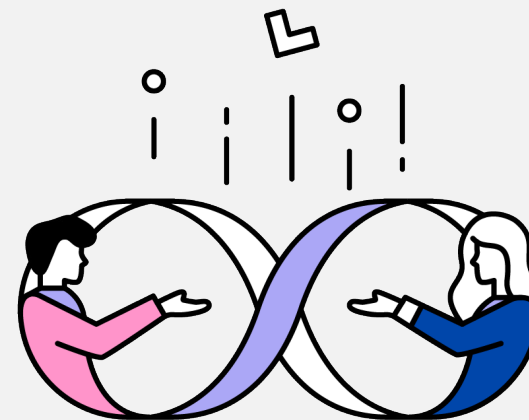


# Showing Care for our Customers



## We show care for our Customers in the way we:

- ✓ Communicate with our Customers and Partners – simply, accurately and with empathy.
- ✓ Design and distribute products addressing the needs and expectations of target customer segments, emphasising suitability, fairness and value, and reducing the risk of being sold to customers when they are inconsistent with their likely objectives, financial situations and needs.
- ✓ We responsibly assess customers before lending.
- ✓ Support customers experiencing vulnerability and those experiencing hardship, work with our customers to help tailor a plan to repay their debts in a mutually beneficial way.





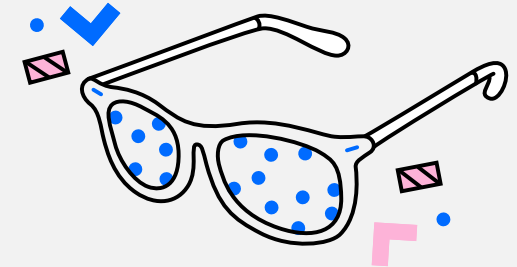
# Showing Care for our Customers



## We show care for our Customers in the way we:

Manage customer complaints by:

- ✓ Encouraging customer-facing employees to take ownership of customer complaints.
- ✓ Ensuring our complaints management team and customer specialists to foster a first call resolution approach to customer concerns.
- ✓ Effectively using insights derived from customer interactions to ensure better customer outcomes every day. Using our complaints data to enable us to identify how we can improve our products and services.



Learn more:

- [Customer, Family and Domestic Violence Policy](#)
- [Complaints Handling Policy](#)
- [Collections and Restructure Policy](#)
- Vulnerable Customers Policy (*under development*)



# Working with **our Partners**



When making decisions, stop and ask yourself:

**Will this strengthen our  
long-term working relationship  
with our partners?**





## Show Care for 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.







# Show Care for Our Partners



## 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.



### Learn more:

- [Know Your Intermediaries Charter AU](#)
- [Know Your Intermediaries Charter NZ](#)
- [Records and Information 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.





# Source Suppliers and Partners with Integrity



## 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:

- [Procurement Policy](#)
- Modern Slavery Statement
- [Fraud Management Policy](#)
- [Financial Crimes Compliance Policy](#)
- [Conflicts of Interest Policy](#)
- Merchant/Partner Onboarding 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.



# Treat Gifts, Entertainment & Travel Responsibly



## How to Treat Gifts, Entertainment & Travel Responsibly:

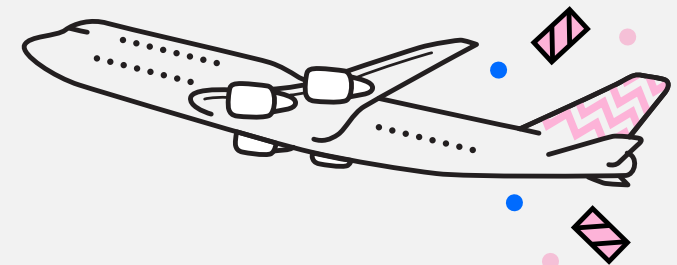
- Be clear on what constitutes acceptable and unacceptable gifts and entertainment and when we offer or accept gifts, entertainment or travel, we make sure they are reasonable, appropriate, and have a legitimate business purpose.
- Be sure to familiarise yourself with guidelines and limits on travel 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](#).

## Do not:

- Give or accept cash or solicit gifts, hospitality or travel from third parties, or put them in a position where they feel obligated to provide something in order to do business with us.
- Ask a partner or supplier to provide gifts, entertainment or travel on our behalf.

Learn more:

- [Gifts and Entertainment Policy](#)
- [Travel and Expenses Policy](#)
- [Financial Crimes Compliance Policy](#)
- [Conflicts of Interest Policy](#)





# 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.





## Respect and Protect Our World



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:

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



# 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.





# Showing Care for Our Community



## 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:

- [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.

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.





# Communicate Clearly & Accurately to the Public



## We communicate clearly & accurately to the public when:

- ✓ Communications about our products are honest, easy to understand and accurate. They are always targeted to the appropriate audience.
- ✓ Our advertising and promotional material is accurate and free of false claims.
- ✓ We keep our customers' experiences and interests front of mind. We therefore include responsible guidelines about obtaining credit, and educate our customers on better money habits and their financial well-being.
- ✓ 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.

Learn more:

- [Social Media Policy](#)
- External Stakeholder Engagement Standard (*under development*)
- Regulator Contact Standard (*under development*)



Helping  
**Each Other  
Live Better**



## 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).



# Foster Diversity, Inclusion & Belonging



## 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:

- [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.

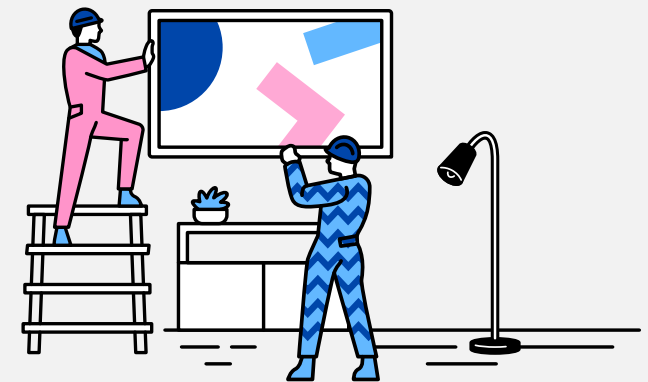


# Show Care for Each Other



## 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.





# Show Care for Each Other



## We Show Care for each other by:

- ✓ 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.

Learn more:

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



# Act Right & Meet Your Responsibilities



# Act Right & Meet Your Responsibilities



**Act Right:** 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 knows to us, where it could be reasonably perceived a conflict of interest could exist.





# Act Right & Meet Your Responsibilities



## Meet our Compliance Requirements

Latitude is a corporate entity, licensed and/or authorised financial services provider, and undertakes securitisation activities. Consequently, Latitude is subject to a myriad of regulatory obligations.

Learn more:

→ [Compliance Policy.](#)

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





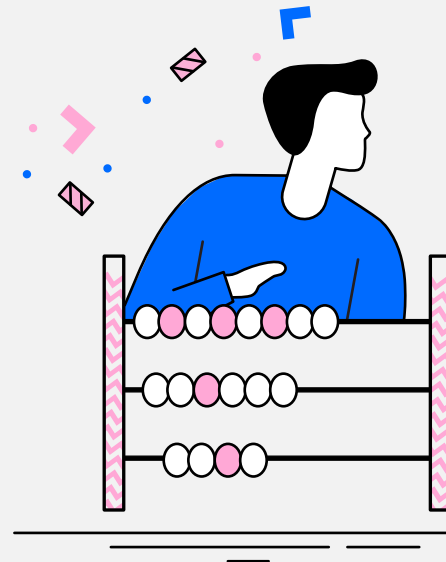


# Act Right & Meet Your Responsibilities



## Fit & Proper & 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.



## 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 risks 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.



## Act Right & Meet Your Responsibilities



Respecting Privacy and Confidentiality.

As **employees of Latitude** we are entrusted with information about our

business, people, customers, suppliers and our partners and must respect the confidential nature of information in our care as required by the Privacy laws (AU/NZ) and Privacy Policy. We may also be party to contracts that impose obligations to maintain the **confidentiality of information**.

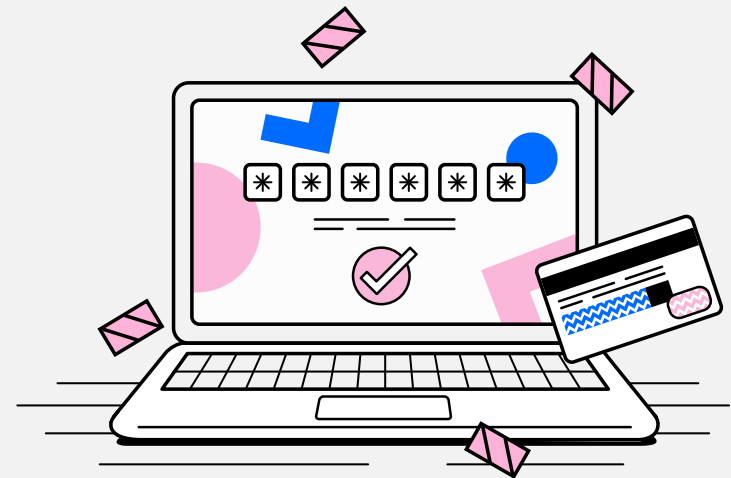


# Act Right & Meet Your Responsibilities



## You can uphold the confidentiality and security of information by:

- ✓ 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.



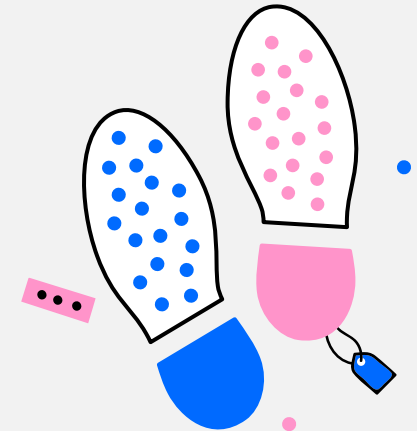


# Act Right & Meet Your Responsibilities



## 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.





# Act Right & Meet Your Responsibilities



## Records Management



- We keep **accurate records** and information in order 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:

- [Records and Information Management Policy](#)
- [Acceptable Use Policy](#)
- [Compliance Policy](#)
- [Operational Risk Policy](#)
- [Conflict of Interest Policy](#)
- [Fit and Proper Policy](#)



# Act Right & Meet Your Responsibilities



## We meet our responsibilities when we:

- ✓ Keep personal information of our employees, customers, suppliers and partners confidential and secure.
- ✓ Disclose and perceive our conflicts of interest, including employment outside of Latitude, and seek approval and/or approval.
- ✓ Meet our Compliance requirements.
- ✓ Manage resources prudently and follow sound accounting practices.
- ✓ Seek approval for any non-standard terms of agreement or contracts and execute financial transactions only with appropriate authorisation and within financial delegation authorities.
- ✓ Understand and act in line with our Acceptable Use Policy, maintaining reasonable personal use, which is lawful, and in no way impacts performance, reputation or business operations negatively.
- ✓ Keep accurate records and information and appropriately dispose of them.
- ✓ Respect intellectual property rights and obligations.
- ✓ Effectively manage operational risk.



# 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.



# Your Responsibility



## 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 KVD Australia HoldCo Pty Ltd, Latitude Financial Services 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.





