

Conflict of Interest Policy

Approved 1 October 2021

1. Overview

Latitude Group Holdings Limited (LGHL) is a corporate entity, listed on the Australian Securities Exchange and the parent of a group of corporate entities providing financial or payment services and undertaking credit activities to both the retail and wholesale markets, the Latitude Group (Latitude).

This policy articulates Latitude's position on dealing with conflicts of interest.

Managing conflicts is fundamental to the running of Latitude's business. It is an integral part of how we manage conduct risk and helps ensure Latitude is operating in a professional, fair, and honest way when dealing with customers and third parties.

This policy should be read in conjunction with the Board Conflict of Interest Policy which provides a framework for managing conflicts of interest at the Board-level.

2. Scope

This document applies to the entire Latitude Group, including:

- Our Board of Directors
- All Latitude employees and representatives
- Contractors and consultants employed by Latitude.

3. Policy Statements

3.1 Defining Conflicts

Latitude defines a conflict as a situation where one or more persons or entities have competing interests and the serving of one interest may involve detriment to another.

Potential conflict situations that could arise include, but are not limited to:

- in providing financial services, where the interest of a customer may be inconsistent with or diverge from some or all of the interests of Latitude
- in performing credit activities, where a customer may be disadvantaged when the interest/s of Latitude as credit licensee conflicts with the legal obligations it owes the customer
- where there are personal relationships between a Latitude employee and a customer, a vendor, a merchant partner, a broker, or another Latitude employee
- employees engaging in personal account trading ("PAT") or outside business interests ("OBI") including board and directorships that could conflict with Latitude.

Latitude recognises that conflicts may have financial or non-financial detrimental impacts.

3.2 Approach to Conflicts Management

Latitude seeks to ensure that a conflict of interest does not adversely affect the interests of customers, Latitude, its shareholders or other stakeholders through the identification, avoidance, or management of the Conflict of Interest.

Identification

Latitude will have processes and procedures in place to help ensure real, potential or perceived conflicts are identified and assessed in a timely and appropriate manner.

All conflicts will be recorded in a central register.

Avoidance

Latitude will take all appropriate and reasonable steps to prevent conflicts.

The avoidance of a conflict is the only option to eliminate the risk of an employee or representative making a decision or engaging in conduct that disadvantages Latitude or a customer in the course of providing a credit activity.

Disclosure

Where a conflict cannot be avoided, Latitude will ensure there is full disclosure of the conflict to affected parties.

Latitude recognises that:

- where a conflict arises in the course of providing a financial service (not a credit activity), clear disclosure to the customer may be adequate and suitable protection for a customer to minimise any disadvantage
- disclosure is inadequate where a conflict arises in the course of providing a credit activity under an Australian Credit Licence.

Record Keeping

Latitude will maintain a Conflicts of Interest Register in which an actual, potential or perceived conflict of interest can be raised. The register will detail a complete record of the conflict of interest, including any steps taken to address the conflict.

Manage

Where a conflict cannot be avoided or disclosure is an insufficient course of action, Latitude will take appropriate and reasonable steps to:

- minimise any detriment and/or reputational damage from the possible impacts or perceptions of the conflict
- promptly address any customer disadvantage that may have occurred.

4. Roles & Responsibilities

All Employees, contractors and consultants, and representatives are responsible for identifying and managing conflicts on an ongoing basis.

Management will be responsible for identifying any instances of non-compliance, actual or potential, under this Policy through continued monitoring and supervision, annual self-assessments and other assurance activities. All identified areas of non-compliance must be reported to Risk as soon as practical.