

## A MESSAGE FROM OUR CEO

Welcome to **flexigroup**.

**flexigroup** has been around for almost 30 years and the innovating spirit that we started with in 1991 is still evident in the modern organisation that we are today. We want you to absolutely love working here with us, and we have some basic principles that we live by that we'd ask you to observe too. Our Code of Conduct reflects the behaviours that we believe will set us apart from our competitors, and it's underpinned by our F Words, which form the characteristics we cherish in our people. We are a customer-led company, so at the very basis of what we do, we need to be Famous for Delivery. We need to understand what our customers love, what they hate, what drives them. And here's a hint – customers aren't just external! Focus on Impact really resonates with me because every time we come into work, we have a chance to change the world, even if it's just a little bit. Every single action, meeting and decision we take can impact the difference we make in the world. When we talk about being Famous for Delivery, we mean getting things delivered and getting things sorted with a winning attitude as that's the benchmark of any globally ambitious company. Feed your mind is important to me as we work in an industry that changes rapidly. It's critical that we keep looking, keep learning, keep being inspired and keep pushing ourselves to make sure we're up to speed with what's new, what's hot and what's happening across the world. And #FTB - as we become an even more significant company, every single person is critical, including you. Who you are, what you do, how you behave and what you commit to, will determine our future. Isn't that exciting?

Together, we can rewrite the playbook for digital spending.

Bec

## OVERVIEW

don't take ourselves too seriously here but let's face it, even Disneyland has rules!

Our Code of Conduct outlines the rules of behaviour we've established for employees who work here at **flexigroup**. This is one of our most important documents because *how* we do things is just as important as *what* we do.

While we encourage you to really do *you* and bring *yourself* to work, we also need to ensure you understand what's not ok here. It's important because we want to create a work environment that is safe, ethical and inclusive for everyone, including you!

These are our serious words, so please pay them the attention that they require.

We all hate it when things go wrong but sometimes they do. It's important to understand that we take breaches of our Code of Conduct seriously and that there are behaviours that **flexigroup** considers to be non-negotiable. We've got a lot of the detail here, but when you boil it down, it all comes back to two simple concepts:

- We're respectful – yes, we're all different, but that's what makes us stronger. We want people to think and look and act differently, we want people to fight the bureaucracy (that's in our Code, after all!) but we always do that respectfully – whether it's in our conversations or emails, our personal presentation, or our behaviour;
- We behave ethically – but we don't do it because we have to, we do it because we want to – whether that's towards our customers (our buyers and our sellers) or our colleagues.



All flexigroup  
locations



Board



NA



Everyone!  
(Employees, Contractors  
& Consultants)



## Our Code

**WHAT:** The digital spending powerhouse, helping people buy everything, everywhere, every day.

**HOW:** By rewriting the playbook for digital spending.

**WHY:** To make a richer, fuller life affordable for everyone.

## The F Words



### FEEL THEIR WORLD.

Know what drives our customers and makes them tick.

Customers – we've gotta be all over them. What they love, what they hate, what drives them, what consumers them, what makes them laugh, cry, what they like to eat, what they're hoping for, dreaming of. We can't bury our heads in our spreadsheets without first knowing what we're doing, who were doing it for and why they might want it.



### FAMOUS FOR DELIVERY.

Get things nailed the first time.

In the immortal words of Steve Jobs, "Real artists ship". Getting things nailed, getting things delivered and getting things sorted is the benchmark of any globally ambitious company. At **flexigroup**, our history and capability should mean we're the absolute best there is when it comes to designing and delivering every single step of the customer journey.



### FOCUS ON IMPACT.

Never lose sight of what you're here to do.

Every time we come into work, we have a chance to change the world, even if it's just a little bit. Every single action, meeting and decision we take can impact the difference we make in the world. Hoping someone else will take charge, make the difference or get the job done is hiding from the job you can do and the impact you can make. Take charge, lean in and never lose sight of what you're here to do.



### FEED YOUR MIND.

Push yourself to stay up to speed with what's hot and new.

We work in an industry that changes every second. What we did yesterday is already out of date and if we're not onto it, we won't make it. It's critical that we keep looking, keep learning, keep inspired and keep pushing ourselves to make sure we're up to speed with what's new, what's hot and what's happening across the world.



### #FTB

There's no room for hierarchy – roll your sleeves up and get sh\*t done.

The comfort we enjoy as a big company is a double-edged sword: hierarchy can be an easy way out of taking responsibility for the way things are. We've been famous in the past for rolling up our sleeves and making sh\*t happen. As we become an even more significant company, every single person is critical. Who they are, what they do, how they behave and that they commit to, will determine our future.



## LIFE AT FLEXI.

We Dream. We Design. We Deliver.

This is the place where you'll be hands on. Where new ideas are welcome and expected. Where everyone is a pragmatist, not a bureaucrat.

Where you'll be expected to roll your sleeves up and really make things tangible. Building prototypes, writing business cases, validating, coding and designing.

At every level – and in every role – we're doers and builders. Not Managers and Minds

This policy was approved by the Board in April 2020.

If you've got any feedback, or suggested updates, please let us know by emailing [grouppandc@flexigroup.com.au](mailto:grouppandc@flexigroup.com.au)



## WHAT'S COVERED?

### 1. Safety within the workplace

- Equal Employment Opportunity, Harassment, Bullying & Discrimination
- Drugs, Smoking & Alcohol Consumption

### 2. Diversity

- What is Diversity?
- Diversity at **flexigroup**
- How Do We Measure Diversity

### 3. What you do and say at work

- What to Wear? We've got you covered!
- Using **flexigroup** resources
- Social media usage, externally and internally
- Personal Relationships

### 4. Customer Focus

- Business Ethics and Conflict of interest
- Dealing with the media
- Gift Giving and Receiving
- Confidentiality and Privacy

## Some Questions You Might Not Have Thought Of, But Are Still Important To Know

### How does The Code of Conduct interact with other policies?

We have other policies that give additional details about important procedures or standards. Just because something isn't mentioned in the Code of Conduct doesn't mean it's not important, or that you don't have obligations when it comes to your behaviour and actions.

We all need to be familiar with and follow the guidelines in all of our policies. Your leader or a member of the People and Culture team can help if you have any questions about any policy. You can find **flexigroup's** policies on flexihub.

### What happens if our Code of Conduct or a flexigroup policy isn't adhered to?

If we believe someone hasn't followed the Code of Conduct or another **flexigroup** policy, we may need to look into what's happened. The process we use is covered in the Managing Conduct policy.

If an investigation finds that an employee has behaved in a way that is not in line with our Code of Conduct or another **flexigroup** policy, disciplinary action may be taken.

If a breach in the Code of Conduct (or a policy) is serious, or repetitive, disciplinary action could include a warning or termination of employment. If a breach is criminal in nature (for example, fraudulent behaviour), **flexigroup** will have a responsibility to refer the details to the relevant authority and if you break the law you may be personally liable for your actions.

As an employee of **flexigroup**, if you see someone behaving in a way that you think is not aligned to the Code of Conduct or any other policy, you need to advise your leader or a member of the People and Culture Team. If you don't report a breach when you become aware of it, it could lead to disciplinary action. If you become aware of something, but you have concerns about raising it, you can use **flexigroup's** Whistleblower policy.

**Any serious breaches of the Code of Conduct will be reported to the Board.**

Compliance with our Code underpins **flexigroup**'s legal obligations across all entities.

At **flexigroup** we want to provide our people with a safe environment, where we all feel comfortable about raising concerns about actual, suspected or anticipated wrongdoing within **flexigroup**.

If you believe Our Code has been breached, then we are relying on you to report it. Don't be afraid to have your say, all current **flexigroup** employees (and those who have left us) are protected by our Whistleblower Protection Policy.

### EEO (Equal Employment Opportunity), Bullying, Harassment and Discrimination

**flexigroup** is committed to ensuring everyone here works in a safe and healthy environment.

We treat each other with respect which means that we don't tolerate discrimination, harassment and bullying in any form – verbal, physical, or mental.

If you believe you've been bullied or harassed by anyone at **flexigroup**, or if you have witnessed this, please share this with your Leader or the People & Culture team.

### Drugs, Smoking and Alcohol Consumption

We know it's common sense not to come to work under the influence of drugs and/or alcohol but at **flexigroup** it's also expected behaviour. You're an adult and you know that drugs and alcohol effect your performance and your judgement, and we trust that you'll keep this in mind at all times – even when we are celebrating our success or at events where alcohol is served.

- Business should be fun. The workplace should be comfortable, inclusive and safe, and time spent on the job should add value to a person's life. For this reason, safety is everyone's responsibility.
- If you have a workplace grievance or dispute that is not a breach of the Code of Conduct, that's okay too but best to first speak to your manager or the People & Culture Team.
- If you do see something that looks like it could be an issue, ask yourself two questions:
  1. Can I fix it myself? If the answer is yes, then do it! If someone's spilled some tea on the floor in the kitchen, you can get some paper towel and clean it up. Yes, we know you're (most likely) not the cleaner, but it wouldn't be good to walk away and leave it and have someone slip and fall and hurt themselves.
  2. What if I can't fix it? Then let your leader, office manager or People & Culture team member know immediately so they can fix it.

- **flexigroup** works hard to build an environment where differences in backgrounds, perspectives and experiences create an inclusive workplace for everyone.
- We don't tolerate verbal, physical or visual harassment or other behaviour where the purpose or effect (even if unintended) is to create an offensive or a hostile or intimidating work environment. This includes sexual, sexist, racial or ethnic comments, offensive jokes or gestures, sexually suggestive pictures, email or voice messages, sexual advances or comments and bullying.
- Our detailed EEO, Bullying, Harassment and Discrimination Policy sets out **flexigroup**'s position, what we should do if we are subject to or witness these behaviours, and how such a situation would be treated.

- If you are taking prescription medications, you must only take as directed as taking medication may affect your performance or others' safety. Inform your leader to ensure action is taken to minimize any risk.
- We love to celebrate success and sometimes alcohol is served. If we're drinking during work-related events, we still need to behave in line with our Code of Conduct and relevant policies.
- It's never ok to put another person's safety at risk, behave in a harassing manner, or not adhere to other **flexigroup** policies.
- Smoking (including the use of vaporizers) in an office environment is illegal and is not permitted within or around any **flexigroup** offices.
- Possession or sale of illegal drugs, or organising the illegal sale of drugs while at work or at a work-related event won't be tolerated. Any

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## DIVERSITY

instances where this occurs will result in termination of employment and will also be reported to the police.

At **flexigroup**, we believe that the more inclusive we are, the more successful we will be. Our goal is to be a diverse workforce that is representative of our customers. We're one team, but we represent lots of different ideas, perspectives, experiences, backgrounds, cultures and sexual orientations. We strive to create an inclusive workplace where all contributions are valued, so that every individual has the opportunity to bring their whole self to work and reach their full potential. We set diversity targets every year, and measure (and report) our performance against them.

### What Is Diversity?

Diversity is about recognising and celebrating the valuable contribution that people from different backgrounds, perspectives and experiences make to our business. Diversity means all those things that make people different from one another including religion, race, sexual orientation, ethnicity, language, gender, age and disability.

### Diversity At flexigroup

A diverse workplace is business-as-usual for us and not a set of activities we take to be compliant. At a high level this means:

- We look for people who will bring diversity to us when we're recruiting
- We embrace individual differences
- We value skills, knowledge, experience, performance and capability
- We don't tolerate discrimination, harassment, victimisation and bullying
- We encourage everyone to Feed their Mind so they can build their careers

### How Do We Measure Diversity?

We track several key measures to make sure we are monitoring how we're progressing against our goals. We use a variety of indicators to measure how we're tracking. These include:

- Parental leave statistics
- Career movement by gender
- Employee population by gender
- Salary comparison by gender and job function
- "Ready now" successors for all leadership roles by gender
- Employee turnover rates by gender
- Employee engagement results by gender with focus on the questions that relate to Diversity
- Employee Assistance Provider Statistics
- Registration of our Flexible Work arrangements so that we can monitor their effectiveness
- Regular reporting to relevant government bodies about our workforce in relation to gender equality

### What To Wear To Work?

At **flexigroup** we want you to bring your whole self to work. How you dress is a reflection of you and you are an extension of the **flexigroup** brand. Translation: if you love to wear a suit, wear one. If you don't, then don't. If you're comfiest in jeans, rock them. If high heels are your jam, parade them. If you're more into sneakers, then wear your kicks. Mix it up! It goes without saying to dress for your day, but otherwise, **you do you!**

### Using flexigroup Resources

**flexigroup** will provide you with tools necessary to perform your role and it goes without saying that we expect that use of all **flexigroup** tools is in line with the Code of Conduct and other relevant policies, but please note that anything you are given from **flexigroup** to perform your job is actually owned by the company.

- It doesn't matter what you have been given, you're responsible for it, so treat it like it's your own!
- Some examples of the things we're talking about are:
  - computers and software;
  - company credit cards;
  - cash;
  - cab charges;
  - mobile phones;
  - company information and intellectual property.
- This also means your work email and all instant messaging tools (like IM, Teams, Skype)!
- We all have lives outside work, and so obviously some personal use of things like company provided mobiles, messenger and email is OK. Just don't take it too far – as a guide, if it's interfering with your work, it's almost certainly too far!

### Social Media

We want you to be active on social media –as **flexigroupies**! Just remember, whether you're Tweeting, Snapping or Instagraming, anything you write on social media is your responsibility.

- Your comments can reach a large audience (because you never know who is connected to who!), so remember: when you're out there, keep it civil, especially if you're talking about work or to work people. If you wouldn't want your leader (or your nana!) to see the post, it probably shouldn't be published!
- It's important to remember that just because something happens outside work hours or outside the office, if you're talking to **flexigroup** people or about **flexigroup**, we may need to look into it.

### Personal Relationships

We want to make sure everyone at **flexigroup** is free from conflict. If you have a personal relationship in the workplace that might influence how you make decisions in your job, whether it's romantic, family or

There are some side hustles that might conflict with **flexigroup**'s activities. We'd appreciate the heads up if you have:

- outside employment (a second job or small business);
- serve as a director of another business or
- have investment or interest in a competitor, customer or supplier.



financial, you will need to inform your leader or a member of the People & Culture team.

There may be some **flexigroup** policies which also impact your family, such as the Trading Policy. Don't forget to check whether our policies also apply to those closest to you.

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## OUR CUSTOMERS

Our customers are at the centre of everything we do so naturally we want to look after them. It's not ok for our customers to be treated with anything less than respect. Even if we need to give the customer a difficult message, which happens sometimes, and the customer is unhappy or angry, we should never be less than professional to, or about, the customer.

## Business Ethics and Conflicts Of Interest

We all have lives outside of work – and that's ok. If you need to make a decision where you have a personal relationship with one of the parties involved, you need to let us know about it. You also need to comply with our Anti-Bribery and Corruption Policy and familiarise yourself with those requirements.

- This might be having a second job, or being an investor in a supplier, or even if you're just being taken to the corporate box at the footy.
- In most cases it's fine, but you just need to let us (either your leader, group exec, or HR) know.

## Entertaining and Hospitality

Hungry? Of course you are! Up for a night out at the footy or a concert? Yep! It's great to build relationships with our customers and suppliers out of a work setting...Just remember:

- If it's over \$AU150 / \$NZ155 / €105, you need your department's Executive's OK.
- if it's worth over \$AU500 / \$NZ525 / €350 you need CEO's OK.

## Media Enquiries and Other External Communications

You can't talk to the media unless you're authorised to by the CEO. If you don't know whether you're authorised to, that means you're not!

- If you're contacted by a member of the media or shareholder, refer them to Head of Corporate Affairs or External Communications Manager so they can find someone who can provide an appropriate response.

## Gift Giving and Receiving

Whilst no one likes to look a gift horse in the mouth, it's important to be careful when accepting or offering gifts or hospitality to suppliers or business partners. **flexigroup** has some ground rules around the giving and receiving of gifts (a bit like a well-planned family Christmas!). To avoid ending up on Santa's naughty list, refer to our Gift Giving Policy on flexihub.

Presents are fun, right? We love them too! It's always good to make sure that there aren't any strings attached to your gifts though – especially if they're from a customer or supplier.

- To make it easier to draw the line about what's ok and what you probably need to declare (or send back 😞), if you get a gift that's worth more than \$AU75 / \$NZ80 / €50 let your department's EA know.
- If you love your supplier, you can send them a gift (it is better to give than to receive, after all!) but limit the value to under \$AU100 / \$NZ100 / €60. Also, make sure you let your department's EA know.

GIVE US THE HEADS UP

HUNGRY?

JUST ASK

WE ALL LOVE GIFTS!

## Confidentiality and Privacy

We have a lot of information about a lot of things. It's what makes us great and gives us a leg up on the competition. That's why it's so important to make sure we look after our confidential information. If people outside the company don't know about it, we need to take steps to protect that information – be smart! We also need to make sure we're looking after our customers' data too. That means we need to make sure that we're collecting and storing information in a way that's legally and ethically responsible.

- Don't talk about confidential information in public (don't be *that person* on your mobile on the train!)
- Password protect files
- Lock papers in drawers
- Not accessing information you don't need to in order to do your role
- Make sure you're not using information collected for anything other than business purposes
- Ensure information is handled in accordance with **flexigroup** guidelines and relevant privacy laws.

## CONCLUSION

**What happens if I'm still not clear about whether something is consistent with this Code or any flexigroup policy or process?**

If you have any doubt about whether behaviour is consistent with this Code, it may help you to ask yourself the following questions:

- Does it feel like the right thing to do?
- Is this aligned to our Code (the F words)?
- What would a customer or shareholder expect or want me to do in this situation?
- Would my colleagues or leader consider my behaviour or communication appropriate?

If you see someone behaving in a way that you think is not aligned to the Code of Conduct or any other policy, you should report any breach or suspected breach to your leader, executive member or a member of the People & Culture team.

If you don't report a breach when you become aware of it, it could lead to disciplinary action.

You can also use **flexigroup's** Whistleblower Protection Policy to report a breach.

## Related Policies

Anti-Bribery and Corruption Policy