

## A MESSAGE FROM OUR CEO



Welcome to **hummm**group.

**hummm**group 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 'How we humm' (formally 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 OF OUR CODE OF CONDUCT

### THE HUMM WAY

**You found it.** 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 feel inspired to roll up those sleeves and really make things tangible. At every level and in every role, we're doers and builders not managers and minders.

Your time at **hummm** will be defined not by where you work but by what you make happen!

>> **How we humm** is your ticket to play - don't lose it! Continue to Feed your mind, Focus on impact, Feel their world, be Famous for delivery, and #FTB.

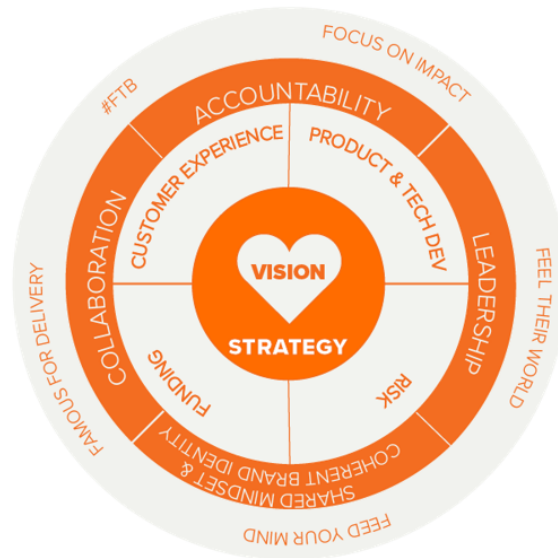
>> **How we work** is what it takes to be a hummbassador. Have you got it? Leadership, Accountability, and Collaboration.

#### >> Our strategic ambition and vision

**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



We 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 **hummm**group. 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 **hummm**group 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 the **hummm**way after all!) but we always do that respectfully - whether it's in our conversations, team chats 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.

## 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 **hummm**group
- How Do We Measure Diversity?

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

- What to Wear? Dress for your day!
- Using **hummm**group 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 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 People Business Partner can help if you have any questions about any policy. You can find **hummmgroup's** policies in the Nestt, along with our Playbooks for a quick guide.

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

If we believe someone hasn't followed the Code of Conduct or another **hummmgroup** policy, we will 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 **hummmgroup** policy, disciplinary action may be taken.

If a breach in the Code of Conduct (or a **hummmgroup** 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), **hummmgroup** 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 **hummmgroup**, 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 People Business Partner. If you don't report a breach when you become aware of it, it could lead to disciplinary action for you. If you become aware of something, but you have concerns about raising it, you can use **hummmgroup's** [Whistle Blower Protection Policy](#).

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

**1****SAFETY WITHIN THE WORKPLACE //****See something? Say Something!**

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

At **hummgroupp** 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 **hummgroupp**.

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 **hummgroupp** employees (and those who have left us) are protected by our Whistle blower Protection Policy.

- Business should be fun. The workplace should be comfortable, inclusive, and safe. Time spent on the job should add value to a person's life, and it is for this reason that 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 Leader or People Business Partner.
- 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 have someone slip, fall and hurt themselves.
  2. What if I can't fix it? Then let your Leader, Office Manager or People Business Partner know immediately so they can look into it for you.

**EEO (Equal Employment Opportunity), Bullying, Harassment and Discrimination  
It's Cool to be Kind.**

**hummgroupp** 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 psychological.

If you believe you've been bullied or harassed by anyone at **hummgroupp**, or if you have witnessed this, please share this with your Leader or People Business Partner.

When it comes to EEO, it's important to us that all candidates are given a fair go. That is, each and every person who applies to work with us is assessed on what they'll bring to the role and to the team. At **hummgroupp** we pride ourselves on being an employer of equal opportunities by assessing our candidates on job performance, skill-set, abilities and potential.

Our recruitment processes are driven by respect, fairness, and inclusion. Any job offer, promotion or career development opportunity is awarded on merit

- **hummgroupp** 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.
- Because we believe in a fair process, our hiring managers approach recruitment with an open mind. They make decisions based on what they see and learn from a candidate during the process, and leave pre-conceived ideas at the door. This means staying off the socials (with the exception of LinkedIn) and any internal systems to check out a candidate.



- Our detailed [EEO, Bullying, Harassment and Discrimination Policy](#) sets out **hummmgroup's** position, what we should do if we are subject to or witness these behaviours, and how such a situation would be treated.

### **Drugs, Smoking and Alcohol Consumption** **It's Common Sense.**

We know its common sense not to come to work (or work from home) under the influence of drugs and/or alcohol but at **hummmgroup** 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.

- 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 if the prescription medication you are taking is impacting or likely to impact the safe execution of your duties to ensure action is taken to minimise 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 **hummm** group policies.
- Smoking (including the use of vaporizers) in an office environment is illegal and is not permitted within or around any **hummmgroup** 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 instances where this occurs will result in termination of employment and will also be reported to the police.

**2****DIVERSITY // Celebrating our Differences.**

At **hummgroupp**, 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 hummgroupp**

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 with **hummgroupp**.

**How Exactly do we Measure Diversity?**

We use a variety of indicators to measure what diversity looks like for us at **hummgroupp**. These include:

- Parental leave statistics;
- Career movement by gender, age and location;
- Employee population by gender, age and location;
- Salary comparison by gender, location and job function;
- "Ready now" successors for all leadership roles by gender and location;
- Employee turnover rates by gender, age and location;
- Employee engagement results by gender, age, location and leadership level 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.



**3****WHAT YOU SAY AND WHAT YOU DO AT WORK // It Matters.****What to Wear to Work?  
Dress for your Day.**

At **hummgroupp** 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 **hummgroupp** 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 hummgroupp Resources  
We've got you covered.**

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

- Laptops, chargers and software;
- Company credit cards and cash;
- Taxi/Uber 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!

**Cyber Security  
It's Serious Stuff.**

Keeping our customer data safe is absolutely crucial, both for protecting our customers and preserving **hummgroupp**'s reputation.

Below are some tips and solutions if you need to share files containing sensitive data:

- **Think again the purpose of data sharing and the recipients**  
We suggest following the "need to know" principle when deciding the recipients of authorised access to data. Also consider the appropriate medium to share the data, such as internal network drives, email, SharePoint, or secure portal.
- **Encrypt your file, share password and passphrase securely**  
Password-protected files can easily be broken with off-the-shelf hacking tools. We recommend using a zip utility such as 7-Zip or WinZip which can compress and encrypt the file, with the sender assigning a strong password/passphrase to the zipped file that the recipient must use to decrypt it. The longer your password/passphrase, the better!

Hot tip: if you need to share the encrypted file over email, you should share the password/passphrase over different channels such as SMS, or call.





- **Sharing files internally** (within **hummmgroup**)  
Use your restricted team's folder on the network drive or your team's SharePoint/Teams. If you have to send a file over email, you should apply data encryption as recommended above.
- **Sharing files externally**  
There are multiple ways to securely share files outside **hummmgroup**. For detailed steps, please refer to this [link](#).

## Social Media

### Your Socials, your responsibility.

We want you to be active on social media as **hummmgroupies**! Just remember, whether you're Tweeting, Snapping or Insta-graming, 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 nanna!) 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 **hummmgroup** people or about **hummmgroup**, we may need to look into it.

## Personal Relationships

### Give us the heads up.

We want to make sure everyone at **hummmgroup** 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 financial, you will need to inform your Leader or a People Business Partner.

There are some side hustles that might conflict with **hummm** group'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.

There may be some **hummm** group 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 //

### Keep them front of mind.

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 Executive, or People Business Partner) 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 / £80, you need your department's Executive's OK.
- if it's worth over \$AU500 / \$NZ525 / €350 / £270, 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. **hummmgroup** 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](#) in the Nestt.

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 / £40, let your department's Executive Assistant 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 / £55. Also, make sure you let your department's Executive Assistant know.

## CONCLUSION

### When in doubt, *always* ask.

What happens if I'm still not clear about whether something is consistent with this Code or any **hummmgroup** 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 ('How we humm' formally our 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, Group Executive or People Business Partner.

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

You can also use **hummm** group's [Whistle-blower Protection Policy](#) to report a breach.

## Related Policies, Playbooks and Training

[Anti-Bribery and Corruption Policy](#)

[Whistle-Blower Protection Policy](#)

First 7 Compliance Modules

[Gift Giving Policy](#)

[EEO, Bullying, Harassment, and Discrimination Policy](#)

[WORK Playbook](#)

[SAFE Playbook](#)

