

# WEALTHCONNECT EMPLOYEE CODE OF CONDUCT

DOCUMENT CLASSIFICATION	Internal Use Only
VERSION	1.0
DATED	27 October 2022
DOCUMENT OWNER	People and Culture

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# 1 INTRODUCTION

## 1.1 Terms and Definitions

Term	Definition
<b>WealthConnect</b>	All WealthConnect Management, Executives and Board Members. WealthConnect is a reference to Creativemass Enterprises Pty Ltd, the global or regional entity of which you are employed or engaged to provide services.
<b>WealthConnect Leaders</b>	All WealthConnect Management, Executives and Board Member.
<b>Staff or Employees</b>	All WealthConnect employees. (Full time, Part time, Casual, Interns, Consultants and Contractors)
<b>Manager</b>	The immediate manager of the employee. Sometimes it may be appropriate for an alternative manager to act in their place.
<b>Stakeholders</b>	All WealthConnect employees, shareholders, board members, creditors, clients, suppliers, contractors and consultants.

## 1.2 Purpose

We (WealthConnect) are committed to providing a friendly, safe, and welcoming environment for all our stakeholders, regardless of gender, sexual orientation, ability, ethnicity, socioeconomic status, and beliefs.

The Employee Code of conduct outlines our expectation for all WealthConnect staff and the consequences for

## 1.3 Scope

It is expected that all WealthConnect stakeholders (see [Terms and Definitions](#)) abide by this code of conduct in all business matters.

### 1.3.1 Who does this policy apply to

The Employee Code of Conduct applies to all WealthConnect stakeholders.

### 1.3.2 When does it apply?

This code of conduct to the conduct of all business matters – online and in-person – as well as in all one-on-one communications with clients and employees pertaining to WealthConnect business.

It is also to be upheld at all professional functions and events outside the WealthConnect office, including but not limited to:

- business and after hours at the WealthConnect office
- work-related extracurricular activities and events
- while working remotely and communicating to WealthConnect stakeholders

This policy also applies to unacceptable behaviour outside the scope of business activities when such behaviour has the potential to adversely affect the safety and well-being of WealthConnect staff and clients.

## 1.4 Related policies

See these related policies

Policy	Description
<b>WHS Policy</b>	<a href="#">WHS Policy</a>

## 2 CULTURE

A supplemental goal of this Code of Conduct is to encourage staff to recognise the relationships between our actions and effects within WealthConnect culture (please also see the *Employee Handbook* for standards of 'Behaviour at Work', p17.)

**Be welcoming.** We strive to be a company that welcomes and supports people of all backgrounds and identities. This includes, but is not limited to members of any race, ethnicity, culture, national origin, colour, immigration status, social and economic class, educational level, sexual orientation, gender identity and expression, age, size, family status, political belief, religion, and mental and physical ability.

**Be considerate.** Your work at WealthConnect will be used by other people, and you in turn will depend on the work of others. Any decision you take will affect users and other staff, and you should take those consequences into account when making decisions.

**Be respectful.** Not all of us will agree all the time, but disagreement is no excuse for poor behaviour and poor manners. We might all experience some frustration now and then, but we cannot allow that frustration to turn into a personal attack. It is important to remember that a company where people feel uncomfortable or threatened is neither productive nor pleasant. WealthConnect staff should always be respectful when dealing with other personnel as well as with people outside of WealthConnect employment.

### **3 ACCEPTABLE AND EXPECTED BEHAVIOUR**

#### **3.1 General Behaviours**

The following behaviors are expected and requested of all WealthConnect Stakeholders:

- Participate in an authentic and active way. In doing so, you contribute to the health and longevity of WealthConnect.
- Exercise consideration and respect in your speech and actions always.
- Attempt collaboration before conflict.
- Refrain from demeaning, discriminatory, or harassing behaviour and speech.
- Be mindful of your surroundings and of your fellow participants. Alert WealthConnect Leaders if you notice a dangerous situation, someone in distress, or violations of this Code of Conduct, even if they seem inconsequential.

Remember that WealthConnect events may be shared with members of the public and WealthConnect customers; please be always respectful to all patrons of these locations.

#### **3.2 Care and Diligence**

WealthConnect and its staff should exercise due care and diligence in the performance of their duties and responsibilities. This should include such activities as ensuring the accuracy of all decision-making information, attending to detail in all aspects of work, being mindful of the sensitivities of others, protecting confidentiality, and being courteous, open, and honest.

WealthConnect aims to provide high quality software and services. WealthConnect and its staff will endeavor to deliver its software and services to its customers in a timely and equitable manner and prioritise customer satisfaction.

#### **3.3 Confidentiality**

Staff will not breach WealthConnect confidentiality or make use of confidential information obtained from WealthConnect for personal gain or in a manner which would be detrimental to WealthConnect.

Confidential information of WealthConnect will not be used except in ways which are authorised by WealthConnect or legally mandated. The same applies to confidential information belonging to third parties which an employee may obtain in the course of their duties.

All staff acknowledge this need for confidentiality in their contracts of employment. WealthConnect will respect the confidentiality of its staff.

WealthConnect and its staff will comply with the content and spirit of all relevant laws and regulations concerning employment, such as anti-discrimination, equality of employment, health, and safety. WealthConnect will endeavor to ensure that all staff are treated justly and without prejudice.

#### **3.4 Use of Company Assets**

WealthConnect assets must be acquired, maintained, and used in an efficient manner and for legitimate business purposes.

#### **3.5 Expectations for Managers & Executives**

While this Code applies to everyone at WealthConnect equally, employees in a managerial role or in an Executive position have extra responsibilities. If you are a manager or an Executive, you have an incredible opportunity to set the right tone for your team and peers, including by doing the following:

- Lead by example, always choosing to act with integrity.
- Speak up when you see a problem and encourage others to do the same.
- Make sure your direct reports understand this Code and what is expected of them.
- Always be receptive to questions, concerns, or comments, and make sure that issues are directed to the people who can help.

Escalate matters that may indicate a violation of the Code or any other company policy to your manager, or the People & Culture Team.

## **4 UNACCEPTABLE BEHAVIOUR**

The following behaviours are considered harassment and are unacceptable:

- See Equal Opportunity, Discrimination and Harassment Policy
- See Code of Conduct Policy
- See Work, Health & Safety Policy
- See Employee Handbook

## 5 REPORTING VIOLATIONS & DISCIPLINARY ACTION

Unacceptable behaviour from any WealthConnect staff, including those with decision-making authority, will not be tolerated.

Refer to the Employee Disciplinary Action Policy for the procedure with how unacceptable behaviour will be actioned.

If you are subject to or witness unethical or unacceptable behaviour, or have any other concerns, please contact one of these resources as soon as possible:

- Your manager, or another manager you trust
- Make a report in line with the WealthConnect Grievance Handling Policy
- The WealthConnect Whistleblower reporting service (please refer to *13-WC Whistleblower Policy* to see if it qualifies as a Whistleblower violation)

It is a violation of this policy to retaliate against any person making a complaint of Unacceptable Behaviour or Grievance against any person participating in the investigation of (including testifying as a witness to) any such allegation. Any retaliation or intimidation may be subject to punitive action up to and including termination.

Reports will be investigated in a respectful, professional manner as promptly and confidentially as possible, by the Whistleblower Protection Officer from our external provider, Stopline. If you are asked to participate in an investigation, you are required to cooperate fully.

Violations of this Code and other company policies are taken seriously. There are consequences for violating this Code or other company policies, which may include discipline up to and including termination of employment.

### 5.1 Good Faith in Reporting

Acting in *good faith* means that all reports of possible violations of this or any Code, company policy, or the law are made sincerely and honestly. In other words, it does not matter whether your report turns out to be true, but you must make it with the best intentions.

### 5.2 Monitoring Compliance with the code

WealthConnect's People and Culture team, in consultation with WealthConnect's external service providers Employsure and Stopline, will monitor compliance with this Code. WealthConnect will also periodically review this Code to ensure it is operating effectively and to propose any changes required to this Code.

## **6 FURTHER INFORMATION**

If you have any further questions regarding this policy and the procedures for the *WC Code of Conduct*, please contact your manager or the People and Culture Team.