

Responsible Entity Code of Conduct

Introduction

- 1.1 Australian Unity Funds Management Ltd and Australian Unity Property Ltd are the Responsible Entities or Trustee (Company) of various registered and unregistered schemes (Funds). The Companies are part of the Australian Unity group (Group)
- 1.2 This Code of Conduct (Code) applies to all officers, Investment Managers, and employees of the Group who are involved in the management or provision of services to the Funds, together with executives and Directors of the Company (Employees)
- 1.3 Is expected that all Employees will observe the highest standards of honesty, integrity and ethical behaviour in the conduct of their duties and obligations and in dealing with other employees and officers, as well as in their dealings with investors in the Fund
- 1.4 This Code should be read in conjunction with the Group Code of Conduct

Purpose of the code

- 2.1 The main purpose of the Code is to:
 - Clarify the standards of ethical behaviour required of Employees and encourage the observance of those standards; and
 - Ensure Employees are aware of and understand the expected behaviours.

Purpose of the code

- 3.1 All Employees must always act in the best interests of the Fund investors and must not permit their own interests to over-ride the interests of investors or the Company
- 3.2 Employees must ensure that they abide by the provisions of the *Corporations Act 2001* (Cth), each Fund's Compliance Plan, the Company's and the Fund's constitution and the Group Management of Conflicts and Related Party Transactions Policy, which encompasses the management of related party transactions between related entities of the Group
- 3.3 Potential or actual conflicts must be managed effectively to reduce the risk that they might adversely impact the integrity of decision-making or the quality of the services provided to Fund investors or would be likely to negatively affect the Company's or the Fund's reputation. Employees should refer to the Group Management of Conflicts and Related Party Transactions Policy
- 3.4 Employees associated with the management of the Fund may be offered gifts at times. A gift that leads to a conflict of interest with duties towards the Fund must not be accepted. Employees should refer to the Group Gratuities & Gifts Policy for further details

Confidentiality and privacy

- 4.1 Employees associated with the management of the Fund may be offered gifts at times. A gift that leads to a conflict of interest with duties towards the Fund must not be accepted. Employees should refer to the Group Gratuities & Gifts Policy for further details
- 4.2 Employees must not misuse information obtained regarding the Company or the Fund for financial reward or gain, or to cause detriment to investors or service providers.
- 4.3 Obligations in relation to keeping information confidential continue to apply after the cessation of employment

- 4.4 The Company has adopted the Group Privacy Policy which contains information about how investors may access and seek rectification of personal information that the Company holds or controls about investors, and what the Company is able to do with information that has been provided in accordance with Privacy Legislation and the Australian Privacy Principles. Employees should refer to the Group Privacy Policy
- 4.5 Service providers to the Funds and the Company are also required to keep information confidential under the terms of the relevant agreement

Whistleblower policy

- 5.1 The Company has adopted the Group Whistleblower Policy which addresses the reporting of improper conduct within the Company and the Group and the protection of an Employee who makes such reports. Employees should refer to the Group Whistleblower Policy

Insider trading and personal dealing

- 6.1 The Group has a Securities Trading Policy in relation to dealing in Fund Securities. This Policy aims to assist in maintaining market integrity of the Fund's Securities by minimising risks associated with insider trading and breaches of confidentiality. Employees should refer to the Group Securities Trading Policy and Continuous Disclosure Policy

Compliance with laws and regulations

- 7.1 Employees associated with providing services to the Fund are required to comply with all applicable laws and regulations, together with governance policies adopted by the Company including:
- This Code
 - Group Securities Trading Policy
 - Group Continuous Disclosure Policy
 - Group Securities Trading Policy
 - Group Privacy Policy
 - Group Code of Conduct
 - Group Whistleblower Policy
 - Group Gratuities & Gifts Policy
 - Group Management of Conflicts and Related Party Transaction Policy.
- 7.2 Employees must also manage risks and risk information to make intelligent and informed decisions for the Company and the Fund

Breach of the code

- 8.1 Any breach of this Code will be viewed seriously and will be subject to disciplinary action, which may include termination of employment. Breaches identified are to be escalated immediately to Wealth Compliance and will be reported to the Company Secretary and the Audit & Risk Committee

Review of the code

- 9.1 This code will generally be reviewed periodically to ensure it remains consistent with the Company's standards of honesty, integrity and ethical conduct