



# ClearView Wealth Limited

ABN 83 106 248 248

## Code of Conduct

5 December 2017

## Document Control & Version History

<b>Policy</b>	Code of Conduct
<b>Document Owner</b>	General Manager, People and Operations and Legal and Secretariat

## Record of Amendments, Authorisations & Issues

<b>Version</b>	<b>Revision Date</b>	<b>Drafted by</b>	<b>Nature of Amendment</b>	<b>Approval Required</b>
1.1	5 December 2017	Legal and Company Secretariat	Minor amendments	BRCC

## 1. Introduction

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ClearView believes that its directors and employees should conduct themselves in an ethical and responsible manner at all times. Ethical conduct relates to standards of behaviour characterised not only by complying with the law but also by acting honestly and fairly.

This Code is applicable to and for the benefit of all directors, employees (permanent and casual) and contractors of ClearView and its subsidiaries.

## 2. Company Values

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- We're never satisfied when it comes to doing better and we never give up on our people, our customers, our partners and the moments that matter. Nothing really good has ever come about because someone gave up. So if there's a better way to do it, we'll find it.

**“Ambition is the path to success, PERSISTENCE is the vehicle you arrive in”**

- We believe that working together benefits the customer and that two heads are better than one, and a lot more fun. Three are better still. We want more perspectives not less. We are a group of like-minded passionate people who turn up every day to share, help and be better than yesterday...together.

**“As you navigate through the rest of your life, be open to COLLABORATION. Find a group of people who challenge and inspire you, spend a lot of time with them, and it will change your life.”**

- A handshake...giving your word...committing...promising...and then actually delivering! If these things come in shades of grey we're not going to get along very well. Only 3 colours matter here – right, wrong and the vibrant pink on our logo.

**“If you have INTEGRITY, nothing else matters. If you don't have INTEGRITY, nothing else matters.”**

- We're also proud to never compromise when selecting our people and there's nothing we hate more than fake. Only positive, genuine people need apply. Honest people. Open. Able to say sorry and admit they were wrong. Tell it like it is. Argue their case but accept a decision. What you see is what you get.

**“The AUTHENTIC self is the soul made visible”**

## 3. Policy on ethical behaviour

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ClearView is committed to operating to the highest standards of ethical behaviour. It will act with honesty and with the highest regard for the safety and health of its employees, customers, the wider community and the environment. ClearView Directors and Employees must act with integrity and honesty in the day to day performance of their jobs and in any situation where their conduct and behaviour could influence respect for the company.

Employees and Directors are encouraged to make the company aware of any unlawful or unethical behaviour they witness or are suspicious of. Employees are encouraged to speak to their manager in the first instance, or if preferable, refer to the Whistleblower Policy for steps that can be taken.

## 4. ClearView's expectations

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All ClearView directors and employees are expected to:

- act in the best interests of the entity;
- act honestly and with high standards of personal integrity;
- comply with the laws and regulations that apply to the entity and its operations;
- not knowingly participate in any illegal or unethical activity;
- not enter into any arrangement or participate in any activity that would conflict with the entity's best interests or that would be likely to negatively affect the entity's reputation;
- not take advantage of the property or information of the entity or its customers for personal gain or to cause detriment to the entity or its customers; and
- not take advantage of their position or the opportunities arising therefrom for personal gain.

ClearView directors and employees must comply with this policy and conduct their activities on behalf of ClearView accordingly. ClearView directors and employees must positively promote the policy by personal example, by giving clear and unambiguous guidance and assistance on its operation, and by ensuring that it is communicated and understood by all.

## 5. Key requirements that must be observed

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All ClearView directors and employees should:

- comply with the letter and spirit of the laws affecting ClearView's business;
- comply with this Code of Conduct;
- act honestly and with integrity, and strive to earn and maintain the respect and trust of co-employees, shareholders, suppliers and the wider community;
- use ClearView's resources in an appropriate and responsible way;
- work safely and with due regard for the safety and wellbeing of fellow employees, customers and all persons affected by ClearView;
- avoid situations which involve or may involve a conflict between their personal interests and the interests of ClearView;
- have due regard for cultural diversity in the workplace; and
- respect the environment and ensure that work activities are managed in an acceptable manner so as to give benefit to society.

## 6. ClearView policies

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ClearView has adopted policies which commit it to meeting its responsibilities in areas where ethical or legal issues arise. Employees should also have regard to the following relevant policies:

- Conflicts Management and Related Party Transaction Policy;
- Fraud and Crime Prevention Policy;

- Gift Policy; and
- Whistleblower Policy.

ClearView employees must comply with the company policies as listed on the intranet.

## 7. The wider community

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### **Safety, health and the environment**

ClearView is committed to managing its activities with concern for people and the environment, and will conduct its business for the benefit of society and without compromising the quality of life of future generations.

## 8. Publication and review of Code of Conduct

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- 8.1 This Code of Conduct will be made available on the Company's website.
- 8.2 This Code of Conduct is reviewed on an annual basis. It was last approved on 5 December 2017.