



SGH GROUP CODE OF CONDUCT

The SGH Group is committed to building and maintaining high standards of integrity, fair dealing, quality of service and ethical behaviour in all their relationships.

The Code of Conduct (the “Code”) is a set of guiding principles that are fundamental to SGH’s successful business operation. The Code incorporates the shared values that guide how the SGH Group conducts its business and builds relationships with clients. The Code is not a substitute for good judgement.

The Code applies to all Directors and employees (full-time, part-time or casual), contractors and consultants of the SGH Group (collectively referred to as “Personnel”). The Code addresses the professional behaviour and standards that are expected of Personnel at all times.

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| Act with Honesty and Integrity | <ul style="list-style-type: none">• SGH expects all Personnel to observe the highest standards of honesty, integrity and ethical behaviour in performing their duties and in dealing with the company, its clients, business partners and other stakeholders.• SGH is committed to conducting its business in accordance with the highest ethical standards. |
| Manage Conflicts of Interest | Managing conflicts of interest appropriately is an important part of maintaining high standards of integrity. SGH has adopted a Conflicts of Interest Policy to identify and manage actual or perceived conflicts of interest. |
| Uphold the Law | <ul style="list-style-type: none">• SGH expects its Directors and employees to adhere to applicable legal and regulatory requirements, and to comply with the spirit as well as the letter of the law.• SGH has a range of established policies to support compliance with the various laws and relevant industry standards. These policies are designed to assist employees in complying with their obligations.• Compliance is an activity incorporated in the systems and processes of SGH. It is an integral part of each employee and Officer position, although it might not be explicitly stated in their job descriptions. Annually all employees are required to attest to their ongoing compliance with all SGH’s Policies and Procedures. |
| Commitment to our Clients | At SGH, we are committed to putting our clients first and working in their best interests. |
| Respect Confidentiality and Privacy | It is a core SGH principle that confidential information must be protected and not improperly disclosed. SGH protects personal information, recognising its obligations under privacy and data protection laws. |
| Maintain a fair and safe work environment | At SGH we uphold the principles of equal employment opportunity and strive to provide a work environment that is free of discrimination and harassment. SGH is also committed to protecting the health, safety and well-being of Directors and employees and any person visiting or working on its premises. |



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| Treat others with respect | <ul style="list-style-type: none">• We treat others with respect, value differences and maintain a safe working environment.• SGH is committed to achieving a diverse workforce that is inclusive and respectful of each other's differences.• We are all expected to treat everyone with whom we deal through our work at SGH with dignity and respect. Unlawful discrimination, harassment, bullying victimisation, offensive or other unacceptable conduct will not be tolerated. |
| Personal Securities Trading | SGH requires its employees to comply with its Staff Trading Policy which covers buying and selling listed securities and SGH Managed Funds. |
| Fair Dealing | <ul style="list-style-type: none">• SGH expects its employees to deal fairly with clients, investors and other stakeholders.• Employees must not take unfair advantage of any stakeholder, supplier, competitor, external auditor, external lawyer or adviser to SGH through illegal conduct, manipulation, undue influence, concealment, abuse of privileged or confidential information, misrepresentation of material facts, or any other unfair-dealing practice.• Employees must not engage in unlawful conduct such as insider trading, or other market misconduct in any securities.• Employees should familiarise themselves with disclosure requirements for its funds and not knowingly misrepresent facts.• Employees are expected to record accurately the performance of their funds and to communicate achievements in a fair and honest manner to clients and investors. |
| Protect those who report wrongdoing | SGH will protect those in the organisation who, in good faith, draw attention to illegal or unethical practices. Those who do so will not be disadvantaged or penalised. |
| How to report a wrongdoing | <p>It is the responsibility of all Directors, Officers and Employees to report instances of illegal or unethical conduct, or a breach of the Code in the first instance to any of the following:</p> <ul style="list-style-type: none">(a) the Executive Chairman and Compliance Director(b) your line manager, or(c) Chief Executive Officer <p>If this is inappropriate, you feel uncomfortable, or the breach is not resolved, contact the Compliance Director (Pam Hauser) or those persons listed in SGH's Whistleblower Policy. All reports will be dealt with in a timely and confidential manner.</p> |
| SGH Whistleblower Policy | SG Hiscock Group encourages people to speak up when they see activity or behaviour that they feel is wrong or does not match its values. The SGH Whistleblower Policy provides clear guidance on how we approach and manage reports of this nature. |
| Periodic review | This Code will be reviewed by the Board of Directors annually, or sooner in the event of a material change to business activities, or if a regulatory event occurs. |
