SGHiscock Investment Management (SGHiscock) Code of Conduct

SGHiscock 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 SGHiscock's successful business operation. The Code incorporates the shared values that guide how SGHiscock 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 SGHiscock (collectively referred to as "Personnel"). The Code addresses the professional behaviour and standards that are expected of Personnel at all times.

Act with Honesty and Integrity	• SGHiscock 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. • SGHiscock is committed to conducting its business in accordance with the highest ethical standards. • We treat others with respect, value differences and maintain a safe working environment. • SGHiscock 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 SGHiscock with dignity and respect. Unlawful discrimination, harassment, bullying victimisation, offensive or other unacceptable conduct will not be tolerated • SGHiscock expects all Personnel to adhere to the SGHiscock Values and to the Behavioural Framework which supports those Values.
Manage Conflicts of Interest	Managing conflicts of interest appropriately is an important part of maintaining high standards of integrity. SGHiscock has adopted a Conflicts of Interest Policy to identify and manage actual or perceived conflicts of interest.

Uphold the Law	• SGHiscock expects its Directors and employees to adhere to comply with applicable legal and regulatory requirements, and to the spirit as well as the letter of the law. • SGHiscock 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 SGHiscock. 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 SGHiscock's Policies and Procedures.
Commitment to our Clients	At SGHiscock, we are committed to putting our clients first and working in their best interests.
Respect Confidentiality and Privacy	It is a core SGHiscock principle that confidential information must be protected and not improperly disclosed. SGHiscock protects personal information, recognising its obligations under privacy and data protection laws.
Maintain a fair and safe work environment	At SGHiscock we uphold the principles of equal employment opportunity and strive to provide a work environment that is free of discrimination and harassment. SGHiscock is also committed to protecting the health, safety and well-being of Directors and employees and any person visiting or working on its premises.
Personal Securities Trading	SGHiscock requires its employees to comply with its Staff Trading Policy which covers buying and selling listed securities and SGHiscock Managed Funds.
Fair Dealing	• SGHiscock 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 SGHiscock 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	SGHiscock 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	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: (a) the Executive Chairman and Compliance Director (b) your line manager, or (c) Chief Executive Officer If this is inappropriate, you feel uncomfortable, or the breach is not resolved, contact the Compliance Director (Pam Hauser) or those persons listed in SGHiscock's Whistleblower Policy. All reports will be dealt with in a timely and confidential manner.
SGHiscock Whistleblower Policy	SGHiscock encourages people to speak up when they see activity or behaviour that they feel is wrong or does not match its values. The SGHiscock 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.