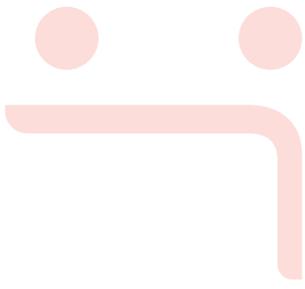




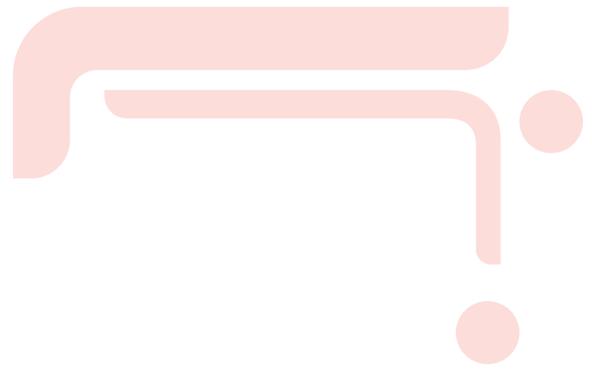
invest**Logan**

Code of Conduct
September 2019



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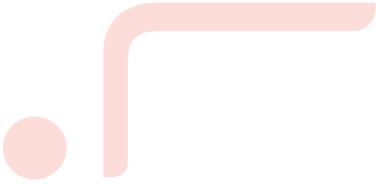


Employees should do the right thing – follow the law, act honourably and treat each other with respect.

We expect all employees to know and follow this Code of Conduct.

Failure to do so can result in disciplinary action, including termination of employment.

Todd Rohl
Chief Executive Officer



Application

To whom does the Code apply?

This Code of Conduct (the Code) applies to all permanent, temporary, casual and part-time employees (other than company officeholders whose legal responsibilities and obligations are set out in the *Corporations Act 2001 (Cth)*), of investLogan. The Code also applies to other persons who may be engaged to undertake activities or control resources on behalf of investLogan.

When does the Code apply?

The Code applies to the conduct of employees during their employment with investLogan. This includes:

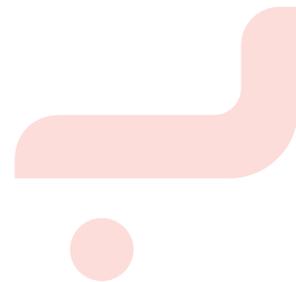
- in the workplace;
- during working activities;
- at work related functions (on and off premises and outside normal business hours).

The *Public Sector Ethics Act 1994* (the Act) applies to investLogan on the basis that investLogan is a corporation under the *Corporations Act 2001 (Cth)* that is assisted by public funds.

The Act prescribes four principles which are considered fundamental for good governance and the basis for a code of conduct. The four principles are:

1. Integrity and impartiality;
2. Promoting the public good;
3. Commitment to the system of government;
4. Accountability and transparency.

These legislated principles form the basis of our Code and guide our thinking, actions, and decision-making.



1 Integrity and respect for persons

At investLogan we:

- (a) are committed to the highest ethical standards;
- (b) accept and value our duty to provide advice which is objective, independent, apolitical and impartial;
- (c) show respect towards all persons, including employees, officers, clients and the general public;
- (d) acknowledge the primacy of the public interest and undertake that any conflict of interest issue will be resolved or appropriately managed;
- (e) are committed to honest, fair and respectful engagement with the community.

1.1 Customer service

investLogan employees must strive to provide excellence and are to treat members of the public with honesty, fairness and with respect.

1.2 Fairness to suppliers

investLogan employees must comply with investLogan's Procurement Policy when seeking suppliers for goods or services, or carrying out work.

1.3 Conflict of interest

investLogan employees must declare any conflict of interest. All conflicts of interest must be managed in accordance with investLogan's Conflict of Interest and Related Party Transaction Policy.

1.4 Influences on decision-making

investLogan employees must not in any way misrepresent their qualifications, experience, expertise or fitness to work in any recruitment or selection process.

investLogan employees must not influence or attempt to influence any person in an improper way to try to obtain any advantages or favours.

1.5 Gifts and benefits

investLogan employees must be mindful that any gift or benefit could create an actual (real), perceived or potential conflict of interest (refer to investLogan's Gifts and Benefits Policy and Conflicts of Interest and Related Party Transaction Policy).

1.6 Additional employment

investLogan employees must disclose in writing any additional employment to their supervisor and it must not:

- adversely affect the performance of investLogan;
- conflict with the employee's duties.

1.7 Public comments on Invest Logan business

Only the Chairperson or delegate in consultation with the Chairperson can comment publicly on investLogan business.

1.8 Use of social media

investLogan employees must not use social media in a way that would bring investLogan into disrepute, imply investLogan endorsement of personal views, disclose confidential information, or provide misleading information about their employment with investLogan.

investLogan employees cannot use investLogan email, letterhead or logo identifications on social media without permission.

investLogan employees conduct on social media, where it is linked to their employment with investLogan, should not contain offensive defamatory or disparaging references which could be considered to be threatening or bullying and harassing.

1.9 External activities

investLogan employees are free to engage in party-political, professional, interest group or charity activities. investLogan employees and officers must make sure that their participation in such activities does not cause a conflict of interest, restrict the performance of their duties with investLogan, or damage the image or reputation of investLogan.

investLogan employees must not use their role in investLogan, investLogan information or information gained in the course of their duties, to advance their position or standing within an external organisation, nor for the benefit or promotion of an external organisation.

1.10 Behaviour towards each other

investLogan employees must treat each other and our customers, clients and business partners with respect, honesty, fairness, sensitivity and dignity (refer to investLogan's Workplace Behaviour Policy).

1.11 Non-discriminatory workplace

investLogan employees must ensure that discrimination is not part of our workplace or our practices (refer to investLogan's Workplace Behaviour Policy).

1.12 Harassment, sexual harassment and bullying

investLogan employees must contribute to building a workplace that tolerates differences and which is free from intimidation, bullying, harassment and sexual harassment (refer to investLogan's Workplace Behaviour Policy).

1.13 Privacy

investLogan employees must maintain privacy In the first instance by:

- informing the employee, why and how their personal information will be used;
- only collecting personal information where authorised and where it is necessary to perform the functions of their role and/or conduct investLogan business;
- taking care about discussing work matters with anyone not entitled to know such information;
- taking responsibility to safeguard confidential files and information;
- use of personal information only for the purpose of which it was collected (refer to investLogan's Privacy and Rights to Information Policy).



2 Law and governance

In recognition that investLogan has a duty to uphold the system of Governance and the laws of the State, Commonwealth and local Governance, public service agencies, public sector entities and public officials, investLogan employees:

- (a) accept and value their duty to uphold the system of Governance and the laws of the State, the Commonwealth and local Governance;
- (b) are committed to effecting official public-sector priorities, policies and decisions professionally and impartially;
- (c) accept and value their duty to operate within the framework of Ministerial responsibility to Governance, the Parliament and the community.

2.1 Acting within the law

investLogan employees are expected to comply with all legislation and other statutory obligations relevant to investLogan.

2.2 Acting within delegations

investLogan employees actions must be undertaken in accordance with the employee's delegation (refer to investLogan's Delegations Policy and Register).

2.3 Raising concerns

investLogan employees have the right to comment on or raise concerns about investLogan policies or practices where they impact on their employment.

When raising complaints or grievances, investLogan employees and officers are expected to act with honesty and in good faith. As such, complaints or grievances which are considered malicious, vexatious or frivolous will not be progressed. investLogan's disciplinary process may apply where employees knowingly raise such malicious, vexatious or frivolous complaints or grievances (refer to investLogan's Workplace Behaviour Policy).

2.4 Anti-bribery and Corruption

investLogan employees are responsible for ensuring that they do not engage in any activity or practice that would constitute an offence under any applicable anti-bribery or corruption laws.

2.5 Reporting unethical conduct

If an investLogan employee becomes aware of conduct in the workplace that breaches the Code, they are obligated in the first instance to discuss the matter with their supervisor, or appropriate senior officer.

Staying silent or non-reporting of unethical conduct is not an option (refer to investLogan's Workplace Behaviour Policy).

2.6 Handling information

investLogan employees must respect the copyrights, trademarks and patents of their suppliers. You must not reproduce or quote suppliers' material unless your agreement specifically allows it.

2.7 Keeping full and accurate records

investLogan employees are responsible and accountable for making and keeping full and accurate corporate records.

2.8 Using investLogan assets

investLogan employees must take good care of investLogan assets while they are in the employee's possession or use, and ensure they are used safely, legally and economically.

2.9 Intellectual property

investLogan employees must not publish or disclose any matters relating to investLogan's intellectual property without appropriate authority.

3 Diligence, economy and efficiency

In recognition that investLogan requires high standards, we:

- (a) are committed to exercising proper diligence, care and attention;
- (b) are committed to using resources in an effective and accountable way;
- (c) are committed to managing information as openly as practicable within the legal framework;
- (d) value and seek to achieve high standards of corporate administration;
- (e) value and seek to innovate and continuously improve performance;
- (f) value and seek to operate within a framework of mutual obligation and shared responsibility.

3.1 Diligence, care and attention

investLogan employees are to conduct their business with integrity, honesty and fairness to achieve the highest standards in service delivery.

3.2 Attendance at and absence from duty

investLogan employees are expected to follow investLogan's employment and working arrangements, agreements and policies on attendance at work and leave.

3.3 Notification of criminal charges and convictions

investLogan employees must notify the Chief Executive Officer or their supervisor of any current charges for indictable offences (e.g. including offences tried before a judge and jury) and findings of guilt for all offences.

3.4 Following lawful directions

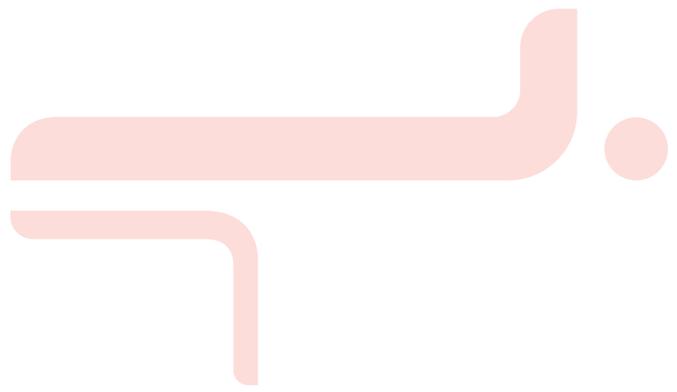
investLogan employees are required to fulfill all responsibilities of their own job, including duties and reasonable directions as lawfully instructed by their supervisor or manager.

3.5 Concern for the environment

investLogan employees must comply with their general environmental duty, and where applicable their duty to notify of environmental harm.

3.6 Self-development

investLogan employees should strive to maintain and improve their work performance and that of their work team in the delivery of customer service. All investLogan employees have a continuing responsibility to maintain and enhance their skills and expertise and keep up to date with knowledge associated with their area of work. investLogan will assist employees by providing access to relevant training and development opportunities.



3.7 Workplace health and safety

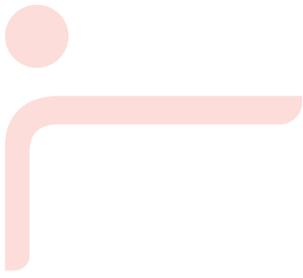
investLogan employees must take all reasonable steps to ensure their own safety, health and welfare in the workplace. All investLogan employees have a duty of care to both fellow employees and members of the public.

All investLogan employees must:

- identify hazards and manage risks to health and safety;
- perform all work safely and follow safe work practices, which is an inherent requirement of their position;
- use personal protective equipment, if required;
- use personal protective equipment correctly;
- report any incidents or hazards immediately and support investigations;
- take corrective action to 'make safe' and implement improvements (refer to investLogan's Workplace Health and Safety Policy).

3.8 Drugs, alcohol and gambling

investLogan employees must ensure that they are not impaired by the effects of drugs and alcohol in the workplace.



4 Breaches of the Code

Breaches of the Code may result in a range of actions including:

- formal or informal counselling;
- application of procedures for the management of diminished performance;
- a cautionary notice; and/or application of the disciplinary.

5 If you have a concern

If any investLogan employee has a concern, or suspect a breach of the Code involving one or more investLogan employees, the employee should report this immediately to their supervisor.

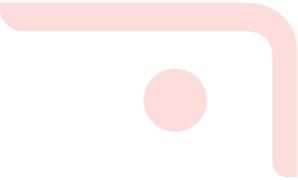


6 Staff access to the Code

The investLogan Code is available to all employees and to the public via the investLogan internet website.

7 Training on this Code

Training in this Code will be provided for new investLogan employees at induction and thereafter on at least a three-yearly basis.



APPENDIX

Definitions

Conflict of interest

Means a conflict between an investLogan employee's work responsibilities and their personal or private interests. A conflict of interest can arise from either gaining a personal advantage or avoiding a personal loss. Conflicts of interest can be actual (real), perceived (apparent), and potential.

Corruption

"In general terms corruption involves improper acts or omissions, improper use of influence or position and or improper use of information". Corruption has a wider interpretation as it does not necessarily involve material gain for the perpetrator or material loss to investLogan. Corrupt practices can lead to direct and indirect advantages not only to individuals, but also to causes and/or other interest groups.

Fraud

Simply put, fraud may be defined as:

"Dishonestly obtaining a benefit by deception or other means."

For fraud to exist, deceit to gain a benefit must be intentional and not accidental. There is a general expectation for fraud to be associated with a deliberate attempt to deceive through false statements, actions or omissions.

There are many definitions of "fraud", but to understand what is meant by fraud in the context of investLogan, the following definition is provided:

Fraud involves, "the use of misrepresentations, dishonest or deceitful conduct in order to obtain some unjust advantage over another or to cause disadvantage to investLogan".

Maladministration

Maladministration is administrative action that:

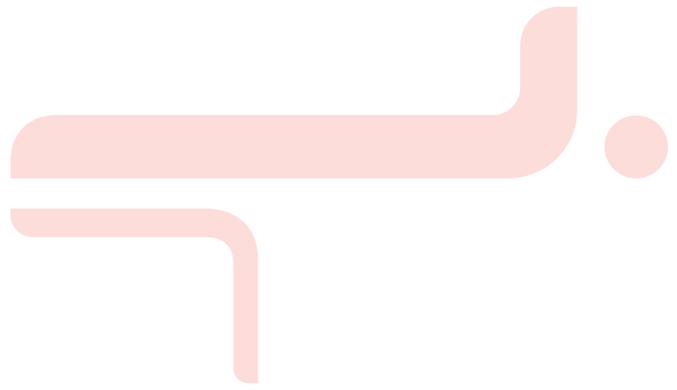
- (a) was taken contrary to law; or
- (b) was unreasonable, unjust, oppressive, or improperly discriminatory; or
- (c) was in accordance with a rule of law or a provision of an Act or a practice that is or may be unreasonable, unjust, oppressive, or improperly discriminatory in the particular circumstances; or
- (d) was taken—
 - (i) for an improper purpose; or
 - (ii) on irrelevant grounds; or
 - (iii) having regard to irrelevant considerations; or
- (e) was an action for which reasons should have been given, but were not given; or
- (f) was based wholly or partly on a mistake of law or fact; or
- (g) was wrong.

Types of interests

Interests can be financial or non-financial (personal family or business). A financial interest is when the employee could gain a personal financial benefit including having shares, receiving gifts, benefits or bribes or receiving hospitality or travel.

A non-financial interests is when, for example:

- An investLogan employee works in the strategic procurement area and one of their regular fishing friends asks them to keep an eye on his tender application.
- An investLogan employee works in the funding application area and is also president of a local group applying for funding from investLogan.
- An investLogan employee works in the development application's area and their children's school will be affected by a new development where the development proposal has been submitted to investLogan for approval.



Relevant documents to reference

- Workplace Behaviour Policy;
- Human Resources Policy;
- Leave Policy;
- Equal Employment Policy;
- Gifts and Benefits Policy;
- Workplace Health and Safety Policy;
- Conflict of Interest and Related Party Transaction Policy;
- Privacy and Rights to Information Policy.

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