
Code of Conduct

July 2022

Plenti Group Limited

1. **Introduction**

- 1.1 Plenti's vision is to build Australia's best lender, providing faster, fairer loans through smart technology to bring our customers' big ideas to life.
- 1.2 We are committed to fostering a culture where conduct and decision making is guided by our values and our commitment to behaving ethically and responsibly is maintained.
- 1.3 This Code describes the standards of conduct that promote adherence to our values.
- 1.4 All employees, temporary employees, contractors, consultants, officers and directors (together, **People**) are required to exercise sound judgement and live up to both the content and spirit of the Code.

2. **Context**

- 1.1 This Code draws on Plenti's values and vision, and is informed by legislation, regulation and Plenti's policies and procedures.
- 1.2 The Code should be read in conjunction with Plenti's policies and procedures, with which all our People must comply. Our People must also comply with relevant legislative and regulatory requirements (together, **Legal Requirements**).
- 1.3 Where there is a conflict between this Code or any Plenti policy and applicable Legal Requirements, Legal Requirements should take precedence.
- 1.4 This Code is approved by the Board and endorsed by Senior Management.

3. **Plenti's values**

- 1.5 Decision-making at Plenti is guided by our four key values:
 - (a) **Think like a customer:** We never forget that our customers are what it's about;
 - (b) **Make it happen:** We keep it simple, do it together and get the job done;
 - (c) **Do what's right:** Our decisions matter; and
 - (d) **Be the best:** We're a high performance team with ideas that make a difference.

4. **Our Responsibilities**

4.1 All People must:

- (a) treat everyone with respect, courtesy, fairness, and honesty;
- (b) act with the utmost care and diligence;
- (c) act in the best interests of Plenti, with regard for our obligations to our People, shareholders, customers, suppliers, competitors and the communities in which Plenti operates;
- (d) understand and apply the laws, policies, procedures and guidelines that underpin their work;
- (e) work collaboratively and collegiately;
- (f) comply with lawful and reasonable directions;
- (g) foster performance and development processes, particularly with employees under their supervision;
- (h) provide ongoing support and feedback to employees under their supervision;
- (i) always uphold the good reputation of Plenti;
- (j) model Plenti's values and professional conduct;
- (k) avoid conflicts of interest, report those that cannot be avoided and cooperate in their management;
- (l) only use of information regarding Plenti or our customers for the work-related purpose it was intended;
- (m) only use their position and resources for a proper purpose; and
- (n) report inappropriate conduct, including breaches of this Code, immediately to their manager or the People and Culture team.

5. **Behaviour at work**

1.6 Plenti is committed to providing a safe and inclusive workplace for all our People. Our workplace includes any place our People undertake their work, and extends to all work-related functions.

1.7 Our People are required to behave courteously and professionally at all times when they are at work, and to comply with all applicable policies in place from time to time including but not limited to Plenti's:

- (a) Work, Health and Safety Policy;
- (b) Working From Home Policy;
- (c) Whistleblower Policy;
- (d) Internet, Email and Computer Use Policy;
- (e) Personal Grievance Policy;
- (f) Workplace Bullying Policy;

- (g) Workplace Drug and Alcohol Policy;
 - (h) Anti-Discrimination Policy; and
 - (i) Diversity Policy.
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6. Behaviour outside work

6.1 Plenti considers that the behaviour of our People outside the workplace has the potential to impact the Company's reputation and business. Our People are therefore expected to uphold Plenti's values in their conduct outside the workplace.

6.2 In particular, People must:

- (a) not engage in activity that is illegal;
 - (b) ensure that any outside employment or directorships (including of other companies or non-profit organisation) do not conflict with their employment obligations, and are disclosed in accordance with Plenti's Conflicts Policy;
 - (c) ensure that any borrowing or investing in Plenti's products is undertaken in accordance with Employee Participation Policy (Appendix 1 to the Conflicts Policy);
 - (d) ensure that any trading in Plenti shares is undertaken in accordance with Plenti's Securities Trading Policy; and
 - (e) ensure that their use of social media is compliant with the Social Media Policy.
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7. Statements on behalf of Plenti

7.1 Plenti's People must not make public or official statements on behalf of Plenti, including to any journalist or media outlet, shareholder, investor or analyst, without explicit authorisation from the CEO. This extends to formal and informal settings, and includes (for example) online chat rooms and social media.

7.2 Our People must familiarise themselves and comply with the Continuous Disclosure Policy to ensure Plenti complies with its disclosure and communication obligations under the Corporations Act and ASX Listing Rules.

8. Confidentiality

8.1 In the course of their employment, our People come into possession of a significant volume of Confidential and Proprietary Information relating to (amongst other matters) Plenti, our customers, our colleagues and our business.

8.2 Our People must:

- (a) comply with applicable privacy laws and Plenti's privacy policies, including the Internet, Email and Computer Use Policy and Social Media Policy;
- (b) ensure that they maintain the confidentiality of any Confidential or Proprietary Information, including by ensuring such information is not disclosed to their family or friends;

- (c) where disclosure of Confidential or Proprietary Information to another employee or a third party is required for a valid business purpose ensure that adequate safeguards are in place to prevent the misuse or further dissemination of the information;
- (d) where there is no valid business purpose for disclosure, only disclose Confidential or Proprietary Information to a third party if the disclosure is:
 - (i) required by law; and
 - (ii) (if possible) with the express consent of the CEO.

8.3 Employees should be aware of the continuing obligations of confidentiality set out in their contract of employment, which continue to apply after their employment ceases.

9. Dealing with third parties

9.1 The nature of Plenti's business means that our People frequently come into contact with third parties, including customers, suppliers, partners, investors, shareholders and competitors.

9.2 In dealing with third parties, our People must:

- (a) behave fairly, ethically, honestly and respectfully and in compliance with applicable laws and Plenti policies;
 - (b) comply with Plenti's Anti-Bribery and Corruption Policy, including in relation to gifts and entertainment and interactions with public officials.
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10. Corporate fraud

10.1 All People are responsible for the prevention and detection of fraud, misappropriations and other irregularities (together, **Fraud**) on the part of individuals and entities involved with Plenti.

10.2 Plenti has no tolerance for Fraud and takes all allegations of actual or suspected Fraud seriously. Any actual or suspected Fraud must be reported to your manager or team leader, Legal & Compliance or (if appropriate) in accordance with the Company's Whistleblowing Policy.

11. Consequences for non-compliance with this Code

11.1 Adherence to Plenti's policies, including this Code, is a condition of employment with Plenti.

11.2 Breaches of the Code will be treated seriously and may result in disciplinary action up to and including termination of employment. Appropriate authorities may be informed where criminal activity or an apparent breach of law or regulation is suspected.

11.3 Investigations into potential breaches of the Code will be undertaken in accordance with applicable Plenti policies in place from time to time.

12. Further information

12.1 For further information regarding this Code or any aspect of Plenti's policies and procedures, please contact the People and Culture team.