



# Code of Conduct Policy

September 2024



## 1. Definitions

Term	Description
Solvar, Company, Group, Solvar Team	Solvar Limited (ACN 117 296 143) and its' subsidiaries
Code	Solvar Code of Conduct Policy
Bribery	Dishonestly persuading someone to act in one's favour by the offering of a gift of money or other inducement

## 2. Related Documentation

- Responsible Lending Policy (Australia)
- Responsible Lending Code (NZ)
- Privacy Policy (Australia & NZ)
- Continuous Disclosure & Investor Relations Policy
- Securities Trading Policy
- Whistleblower Policy
- Conflicts of Interest Policy
- Technology Policy
- Expense Claim Policy
- OHS Policy (Australia)
- Health and Safety Handbook (NZ)
- Harassment and Bullying Policy
- Equal Employment Opportunity Policy
- Alcohol & Other Drug Policy
- Diversity Policy
- Human Rights Policy

## 3. Authority & Approval

This policy has been authorised by the Board of Solvar. Its maintenance is the responsibility of the Audit, Risk & Compliance Committee.

The policy will be reviewed every two years by management and the Committee.

## 4. Introduction

As a leading provider of unsecured personal loans and secured automotive and recreational equipment loans, Solvar Limited and its subsidiaries (Solvar Group) play an important role in enabling and facilitating economic and social development across Australia and New Zealand.

Our Code of Conduct provides a set of guiding principles for everyone who works in and for the Solvar Group. It sets out our legal and ethical obligations – not only what we can do, but what we should do.

This policy applies to all persons working for and on behalf of, or providing services to the Company in any capacity, including employees, directors & officers (the Solvar Team). It applies to you whenever you are identified as a representative of Solvar, in your workplace and also outside working hours.

Contractors and consultants are also expected to observe the Code's principles when working with Solvar.

The Code sets out the standards of conduct and behaviour we expect and require of all our people, based on our values and the legislation we must comply with.

## 5. Our Purpose and Values

The primary objective of Solvar is the provision of simple and transparent credit to consumers in a sustainable manner.

The Company will achieve this objective over the long term by working together as a team and living by our values. We do this by:

- Ensuring our customers are at the forefront of everything we do
- Having a happy, driven and engaged team deliver our products and services
- Respecting and helping our customers and each other, and
- Always doing the right thing.

## **Our Values**

*These four values sum up what's important to us, and how we aim to operate.*

### **Customers are at the heart of everything we do**

We deliver empowering innovative products designed around the customer's needs.

### **Care and respect**

We don't judge or make assumptions. We treat people as individuals and with the utmost respect. We listen, we empathise, we help.

### **Growing together**

We grow great people who are always up for the challenge and look out for one another. We love to have fun together and celebrate our wins.

### **Delivering with integrity**

We always do our best. We are responsible for our actions and not afraid to learn from our mistakes.

## 6. The Company's Commitment to You

Guided by the Group's vision **'to be an ethical lender with a heart'** and our values which underpin everything we do, Solvar commits to ensuring the well-being of our people, our customers, and the community with regard to our business and lending activities by:

### Governance

- Ensuring responsible lending principles as indoctrinated in our Responsible Lending Policy, form the basis of all our lending decisions. This is strictly adhered to and monitored by our Credit Committees.
- Ensuring the team is fully versed and abides by all other legislative requirements including the AML.
- Our active involvement with financial services industry bodies, ensuring we have (and are) a voice at the forefront of the industry.
- Appointing independent Board Members to set and drive the business strategy.
- Using best practice principles to guide our decisions and processes.

### Our People

- Enabling a culture where our people come first, and diversity and inclusion is the norm.
- Building the capability of the team and providing opportunities for development in line with our high-performance strategy.
- Providing a safe and healthy workplace for all our employees which does not harm the environment. The team understands this is everyone's responsibility.

### Our Customers

- Providing our customers with a wraparound service and true value-add products which enable them to live a better life.
- Engaging with our customers to remedy issues as they happen.
- Working with our customers during times of hardship, ensuring them the best possible outcomes.
- Referring customers to seek independent advice as required.
- Not knowingly supporting customers involved in unlawful or questionable activities.

## Our Community

- Supporting organisations in the community with a social agenda.

## 7. Our Expectations of You & Each Other

Our Code of Conduct provides a set of guiding principles for everyone who works in and for Solvar. It sets out not only our legal obligations but also our ethical obligations.

We expect our team to embrace this Code at all times and to follow its guiding principles and obligations:

### 7.1 Guiding Principles

- Prioritise our customers' needs
- Deliver empowering and innovative products and services to our customers
- Show honour, care, and respect to everyone we deal with by
  - acting:
    - Ethically
    - Professionally
    - Honestly
    - Faithfully
    - Efficiently
    - Conscientiously, and
    - In good faith, at all times.
  - using integrity and good judgement in all our actions; and
  - recognising culture & beliefs different to our own.
- Embrace innovation by being at the forefront of technology changes.
- Grow together by embracing education and training.

### 7.2 Your Obligations

#### 7.2.1 Behaviour

- Embrace the Company's guiding principles.
- Use your best judgement to determine whether your behaviour is ethical and appropriate in all situations.

- Act with professionalism and integrity, operating within all applicable laws in the jurisdictions in which we operate.
- Do not commit any fraudulent activity that will bring the company into disrepute. Report any observable fraudulent activity.
- Do not bring the company or any of its customers into disrepute through our professional and/or private activities.
- Be aware of and communicate commercial opportunities important to the performance of Solvar.
- Carry out your duties in an efficient, competent manner and maintain specified standards of performance.
- Be present at work as required, and only be absent from the workplace with proper authorisation.
- Not engage in any private activity (or employment), whether paid or unpaid, or accept any gifts or personal benefits that could conflict with your work for Solvar.
- Give full commitment to the performance of our duties and work towards meeting all objectives.
- Maintain the appropriate standards of behaviour, language and dress and come to work unimpaired by the effects of alcohol and drugs.
- Keep informed of, and comply with, all Company policies, procedures and instructions that may be issued or published from time to time either verbally or in writing.

### **7.2.2 Stakeholders and the Markets**

Solvar is listed on the Australian Securities Exchange (ASX) and therefore has an obligation to comply with the Corporations Act 2001 (Cth) and the ASX Listing Rules. Any failure by the Company or any representative of the Company to meet these obligations could be a breach of the law and damage our reputation.

#### *Security Trading*

As a Solvar team member, you and your associates are prohibited from trading in the Company's securities if you are in possession of privileged or inside information in relation to the Company.

Privileged/inside information is information, which is not generally or publicly available and, if used, a reasonable person would expect it to materially affect the price or value of those securities. You are also prohibited to trade in Solvar securities in the numerous black-out or prohibited trading periods during the year.

You have an obligation to ensure that you adhere to the requirements of the Securities Trading Policy. If you are not sure if you are in possession of privileged/inside information, or if the Company is currently in a black-out trading period, please ask the Group's Company Secretary for clarification.

#### *Continuous Disclosure*

ASX Listing Rules require the Company to provide the timely and accurate disclosure of information, including market sensitive information, to its shareholders and the ASX via their announcement's platform.

Market sensitive information is information that, if used, a reasonable person would expect it to have a material impact on the price or value of the Company's securities.

The Solvar executive team and Board are responsible for ensuring that all other members of the executive team and Board are kept informed of any continuous disclosure events and that the lodgement of announcements to the ASX follow the continuous disclosure protocols within the Company's Continuous Disclosure & Investor Relations Policy.

Disclosure of market sensitive information must always be released by the ASX before it is provided to the media, any other person or published on our Company website. As a Solvar Team member, you have an obligation to adhere to the Company's Continuous Disclosure & Investor Relations Policy.

*Further information can be found in the following:*

- *Continuous Disclosure & Investor Relations Policy*
- *Securities Trading Policy.*

### **7.2.3 Responsible Lending and Financial Services Act**

The Company has developed a Responsible Lending Policy that governs how it lends to customers. These guidelines include its obligations under the specific financial services legislation in the countries in which it operates.



Adhering to the Responsible Lending Policy will help the Company maintain its integrity and good reputation and ensure it is not exposed to the potentially significant penalties for contravening any relevant legislation.

The Company is committed to providing regular training to the team to ensure compliance with all its responsible lending requirements

As a Solvar Team member, you are obligated to ensure you comply with the Responsible Lending Policy for the jurisdiction in which you operate and undergo all necessary training provided by the Company.

Further information can be found in the following:

- Responsible Lending Policy (Australian employees)
- Responsible Lending Code (NZ employees)
- Privacy Policy – Aus & NZ

#### **7.2.4 Anti-Bribery and Corruption**

The Company has a zero appetite towards Bribery, Corruption and Facilitation Payments. Solvar Team members acting for or on behalf of the Company are prohibited from:

- engaging in any kind of Bribe, Facilitation Payment, or corrupt behaviour, regardless of whether or not a benefit is given to or received by another person, including Public Officials, and regardless of the value of the benefit;
- carrying out any dishonest accounting or concealment of financial activity; and
- making political donations on behalf of the Company – unless expressly permitted in writing by the full Board of Solvar Limited.

The Company encourages Solvar team members to speak up and report any suspicion of a Bribery and/or Corruption incident without fear of reprisal. To this end, the Company maintains a whistleblowing program that enables all team members to make disclosures and provide support to people speaking up in relation to Bribery and Corruption and other related matters. The Company is committed to ensuring that all team members understand:

- how to report a Bribery and/or Corruption incident;

- that they are aware of their right to remain anonymous when reporting an incident (should they qualify under the Whistleblower Policy);
- how they will be supported when they report an incident; and
- that there will be no reprisals as a consequence to their report.

All interactions with Government or Political parties on behalf of the Company must be reported to and approved by the Group CEO/MD prior to the occurrence.

*Further information can be found in:*

- *Whistleblower Policy.*

### **7.2.5 Conflict of Interest**

Your personal interests should not conflict with your duties and obligations to the business. Real, potential, or perceived conflicts of interest need to be identified and appropriately managed.

A conflict of interest could occur if you have a personal relationship with a customer or supplier to the business, either directly or indirectly through a family member, friend, or associate.

To manage conflicts of interest, you must disclose any real, potential, or perceived conflict to your manager or senior management team, which in turn must be registered with the Group Company Secretary.

*Further information can be found in:*

- *Conflicts of Interest Policy*

### **7.2.6 Privacy and Confidentiality**

During your day-to-day work you will come across information which the business considers to be confidential. This could be customer, financial, employee and/or strategy related information.

Sometimes you may be given access to information on a 'need to-know' basis to enable you to do your job, which your colleagues may not have access to. You must keep this

information confidential from everyone – from your colleagues and also external third parties.

You should also keep confidential any information you come across in dealings with customers, suppliers, and other third parties. Any confidential information you have from a previous employer must also remain confidential – you should not share it in your current role. This will also apply if and when you leave the Company.

Solvar is governed by the Australian Privacy Act 1988 and the New Zealand Privacy Act 2020. All personal information which we collect must be used, stored, handled, and updated in accordance with the Privacy Principles enshrined in each country's Privacy Act and our own Privacy Policies.

All Solvar team members are obligated to adhere to the Company's Privacy Policies.

*Further information can be found in the following:*

- *Privacy Policy – Aus (Australian employees)*
- *Privacy Policy – NZ (NZ employees)*

## **7.2.7 Company & Customer Assets, Facilities, and Information Systems**

Our Company will strictly adhere to the Privacy Principles enshrined in the Privacy Acts of Australia and New Zealand to protect customer and company data on its network infrastructure.

Our building facilities, office equipment, vehicles and network infrastructure are to be used for authorised purposes only and not for your own benefit. The unauthorised removal of any Company or Customer asset, equipment or physical/electronic information systems is considered to be theft.

The use of or the presence of a USB drive with or on Company property is against the Company's Technology Policy and is considered a termination of employment event.

If you have been entrusted to retrieve or care for a Customers asset, then you must treat it with the same respect as a Company owned asset.

You must use the Company's network infrastructure appropriately and comply with the policies in place to ensure integrity and manage the risks associated with the network

systems. Remember that any information you create, share, or download onto our computer systems belongs to the Company.

The use of any social media or networking site must also be in accordance with this policy.

Management authorisation and approval will be required to:

- Remove any equipment and/or systems from the Company
- Use any Company assets for personal use, i.e., mobile phone or company vehicle
- Use your own personal electronic device or vehicle for business purposes.

In all cases you are obligated to follow company policy for appropriate use.

You can also claim for approved work-related expenses from the business. Claiming or attempting to hide personal expenses among work-related expenses, however small, is a serious issue and a breach of trust that could impact your future employment. If it involves a breach of the law, it may also be referred to the appropriate regulatory body.

*Further information can be found in the following:*

- *Technology Policy*
- *Expense Claim Policy*

### **7.2.8 Human Rights**

People come first. We understand that our business can only prosper if our team members are happy, driven and engaged. Only then can our team members provide a top-class experience to our customers, who in turn will be happy to do business with us, refer their friends and come back for more.

With this in mind, the Company has put in place many programs and policies to support Solvar Team members and its customers. It is every team members obligation to abide by these policies

*Training Program:* Building the capability of the team and providing opportunities for development is a top priority for the business. It is every team members obligation to undertake the training provided to them.

*Rights and Respect:*

- The Company is committed to employing the right person for the job no matter the candidates gender identity, age, ethnicity or cultural background, sexual orientation, religion, health and physical ability, or educational background.
- You must be sensitive to and follow the various protocols and procedures that apply to the applicable cultures of where our services are delivered.
- You must fulfil your obligations in a fully participative manner, respecting the rights, culture, and beliefs of everyone you deal with.
- You must Observe the rights of others to privacy and confidentiality.
- You must respect others' dignity and worth and treat them accordingly in all dealings.
- You must be impartial, unbiased, unprejudiced, fair, just, and equitable in all dealings.
- You must not discriminate against any person on the grounds of their gender, sexual orientation, marital or family status, religious or ethical beliefs, colour, race, ethnicity or national origins, disability, age, political opinions, or employment status.
- You must always operate within the framework of Solvar's values irrespective of your specific personal beliefs and values. Ensure that personal values and philosophies do not influence a decision relating to a client or colleague.

*Anti-Bullying:*

We will not tolerate harassment, bullying or discrimination of any kind. You must avoid behaviour that might intimidate, bully, cause distress, harassment or contribute to disruption in the workplace. This includes the use of inappropriate, obscene, or threatening language to colleagues, managers, clients, or visitors.

*OHS:*

Every person has the right to work in a healthy and safe environment. We are committed to providing a working environment that complies fully with all local and national laws and regulations regarding safety in the workplace. It is everyone's responsibility to adhere to our health and safety-related policies and to report all issues immediately to management.

All team members are obligated to take all practicable steps in the workplace to prevent personal injury and illness to themselves and their colleagues. Workplace hazards must be reported, and protective clothing worn if required.

*Employment Practices:*

The Company is committed to employing staff in accordance with all applicable employment law practices. Team members have an obligation to report to the Company any suspected breaches of applicable employment law.

Any employee wishing to report a breach of any policy or other matter, please speak with your manager, Human Resources Department or the Company's Whistleblower Disclosure Officer should you not feel comfortable speaking to any internal department.

*Further information can be found in the following:*

- *OHS Policy (Australian employees)*
- *Health and Safety Handbook (NZ employees)*
- *Harassment and Bullying Policy.*
- *Equal Employment Opportunity Policy*
- *Alcohol & Other Drug Policy*
- *Diversity Policy*
- *Human Rights Policy*

## 8. Reporting Behaviour not Consistent with the Code

If you see or suspect any behaviour is happening in the workplace that contravenes this Code, or any Company policy you must report it to your manager or a member of the senior management team. If you feel you cannot speak to management about the issue, then please contact the Whistleblower Disclosure Officer.

Not following this Code is a serious matter to Solvar and it will be investigated to determine if a breach has occurred. Behaviour or actions found to be in breach of this Code or our policies, or are considered to be unacceptable by Solvar, may warrant a reprimand or warning, however more serious breaches may result in termination of employment. If you violate any laws then legislative enforcement procedures will also apply.

You should feel free to challenge the way things are done if you think it is wrong or can be done better. You must speak up if you genuinely feel you are under pressure to do something which is or may be inconsistent with this Code, our policies, or our values.

You are protected by legislation for the reporting of certain breaches under this Code.

*Further information can be found in the following:*

- *Whistleblower Policy*

## 9. Other Important Information

This Code sets out the general guidelines for expected behaviour in our workplace. You will find more detailed information and all Company policies in Elmo or The Garage.