

Code of Conduct





This Code of Conduct is intended to provide guidance on how we must deal with our co-workers, stakeholders and clients, at work and work-related events. It is not intended to cover every circumstance and should be used as a practical guide as to what we should do in certain situations, how we should act, and the professional behaviour that we expect when we deal with each other, our clients and our external stakeholders.

This Code of Conduct applies to all of us; being all directors, employees, contractors, sub-contractors, agents and suppliers of Herron Todd White (Australia) Pty Ltd, Herron Todd White (Consolidated) Pty Ltd and all Herron Todd White Network Entities and Sub-Contractors (the Herron Todd White Group) regardless of role or location.

The Herron Todd White Group values are: Professionalism, Innovation, Collegiality, and Fairness & Equity. These values focus on our responsibilities to each other, our clients and our stakeholders. It is through our behaviour in the workplace that we demonstrate our commitment to these values and the acceptance of our responsibilities.

We are all required to:

- act in accordance with our Code of Conduct and Values;
- comply with other HTW policies and procedures contained in the Blue Book;
- comply with all applicable laws wherever HTW operates; and
- seek advice when we have any doubt about the right course of action.

Where the Code of Conduct or the Blue Book sets higher standards of behaviour than applicable laws, rules, customs or norms, the higher standards in the Code of Conduct or the Blue Book will apply. It is your responsibility to familiarise yourself with the Code of Conduct and the Blue Book, and any changes or updates as advised and made by HTW from time to time.

You are required to read and understand this Code of Conduct and always comply with it.

Please contact your Manager or Director if you have any queries or require clarification of any issues in this Code of Conduct.



Gary Brinkworth

Chief Executive Officer



At Herron Todd White (HTW) we all have a role to play in embodying and protecting HTW's brand and reputation. Our behaviour and the conduct of our people is integral to Herron Todd White's overall business success.



Providing a safe and healthy working environment for all employees of HTW is of vital importance to us.

AT HTW, YOU ARE REQUIRED TO

1. Carry out your work professionally, honestly, diligently and with integrity

- Act professionally and with honesty, integrity, diligence and accountability in dealing with our clients, stakeholders and co-workers.
- Be prompt and courteous in your dealings with clients, co-workers and stakeholders.
- Adhere to HTW client's professional standards, industry standards and services agreements.

2. Be fair, ethical, courteous and respectful to others

- Take accountability for creating an environment that is open, honest and transparent.
- Treat clients, stakeholders and co-workers with fairness and respect at all times.
- Comply with all reasonable and lawful instructions from HTW management.
- Promote the equitable treatment of all HTW employees, ensuring equal access to opportunities for everyone.
- Comply with our 'Anti-Discrimination, Bullying & Harassment Policy' in the Blue Book.

3. Take an innovative approach to our service offering

- Realise that our staff need the best resources in order to meet and exceed the needs of our clients and stakeholders and invest in developing technology accordingly. Our in-house team of software developers, IT support and other IT staff are continually working on making our systems cutting edge.
- Strive for new ways to provide the very best service and quality of work to our clients and stakeholders.
- Be open to new products that will add benefit to the business, our stakeholders and/or clients.
- Encourage and support employee feedback as to how you can be adopting different ways of thinking and doing things.

4. Promote a collegial working environment

- Encourage everyone to create a workplace atmosphere that celebrates a team spirit that is supportive.
- Unite with your co-workers in a common purpose and respect your co-workers abilities to work toward that purpose.

5. Strictly adhere to obligations of confidentiality and privacy

- Regard the lawful treatment of personal information with utmost importance.
- Refrain from using or disclosing to any person any confidential information of/or relating to HTW, customers, clients, stakeholders or any person whose confidential information is accessible or obtained in the course of employment or your engagement. This obligation continues post-employment or engagement.
- Refrain from making improper use of confidential information obtained through your employment with HTW.
- Comply with HTW Privacy Policies and Procedures in the Blue Book.

AT HTW, YOU ARE REQUIRED TO

6. Disclose and take reasonable steps to avoid any conflicts of interest

- Speak with a Senior Manager or Director immediately should you become aware of the possibility of a conflict of interest, or circumstances which may give rise to a conflict of interest, to that of HTW or which affects your ability to carry out your duties or responsibilities.
- Refrain from carrying out work that would affect, or has the potential to affect, your professional integrity, impartiality and accountability to HTW clients, stakeholders and the broader community.
- Comply with the 'Dealing with Personal Conflicts of Interest Procedure' in the Blue Book.

7. Act ethically and with integrity

- Act in a manner that does not invoke benefits or advantages due to your position or duties.
- Decline any offers or accept any gifts, entertainment or hospitality in circumstances which could be considered to impair effective judgment, give rise to undue influence or a real or perceived conflict of interest.
- Comply with HTW 'Anti-Bribery and Corruption Procedure' in the Blue Book.

8. Respect and use HTW's IT resources appropriately

- Use all HTW owned IT infrastructure for authorised purposes only.
- Use the HTW owned IT infrastructure and resources in a professional, ethical, lawful and acceptable manner.
- Refer to the IT Security Policies and Procedures within the Blue Book.

9. Respect property

- Respect HTW's property including intellectual property, and property belonging to other co-workers.
- Refrain from using HTW equipment for personal reasons, unless management has approved such use.

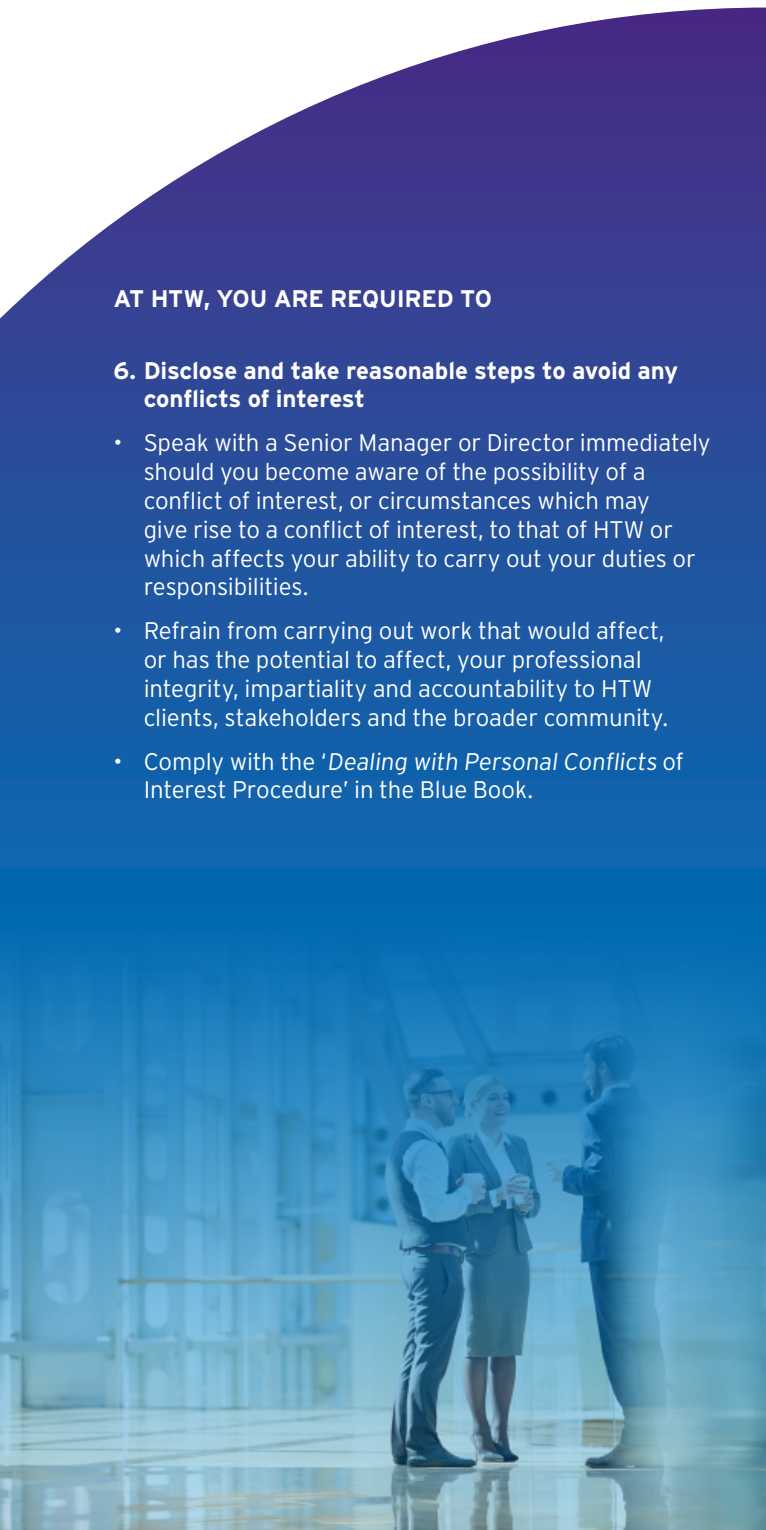
10. Refer Media requests to People & Comms team

- Avoid making unauthorised comments to the media or to any member of the public about HTW or our business.
- Ensure that all media requests are referred to the People & Communications team for comments, unless you are authorised to speak on behalf of HTW

11. Take appropriate care for the health, safety and wellbeing of yourself and your co-workers.

- Refrain from fighting in the workplace.
- Refrain from using offensive language in the workplace.
- Refrain from bullying, discriminating against or sexually harassing any other person.
- Refrain from possessing or using non-prescribed drugs in the workplace.
- Read and comply with our WHS Drugs, Alcohol and Smoking Policy. We like to celebrate success at Herron Todd White and when at work you must ensure that your conduct is professional and you are in a condition to perform your duties safely and efficiently, without risk of causing harm to yourself or others.
- Be observant of any other issues that may affect the health, safety and wellbeing of yourself and of others, and comply with all applicable rules, HTW policies and procedures, laws and regulations.
- Comply with the Work Health & Safety Policies and Procedures within the Blue Book.
- Comply with the 'Anti-Discrimination, Bullying and Harassment Policy' within the Blue Book.

Our business activities are highly reliant on information that is gathered, stored, processed and delivered by technology including computers and their associated communication facilities. HTW is committed to providing and maintaining a secure, effective and reliable IT infrastructure to support our operations.



AT HTW, YOU ARE REQUIRED TO

12. Avoid Anti-Competitive Conduct

- Maintain the independence of HTW and avoid anti-competitive conduct.
- Refer to the '*Competition and Consumer Law Compliance Policy*' and accompanying Procedures within the Blue Book.

13. Demonstrate Sustainable and Ethical Work Practices

- Recognise that acting in a responsible, ethical and sustainable manner creates new opportunities, enhances investor value and improves social and environmental returns.
- Be committed to enhancing the communities in which we operate through actions including active engagement, offering innovative and sustainable products, preserving heritage and enhancing culture and a focussed program of community donations, investments and initiatives.
- Comply with our Environmental, Ethics and Sustainability Policies and Procedures and play your part in protecting the environment and promoting ethics and sustainability.

14. Comply with all HTW policies, procedures, contracts, relevant statutory requirements and industry guides.

- Adhere to the Australian Property Institute fundamental rules, Code of Ethics, Rules of Conduct, Constitution and By-Laws.
- Speak with a Senior Manager or Director, immediately, should you become aware of the possibility of a criminal or civil charge brought against you, that may result in arrest or court hearings.
- Adhere to the Royal Institute of Chartered Surveyors' By-Laws, professional statements and regulations.
- Adhere to other applicable legislation and industry guides pertaining to our business.



Our people must ensure that they act in compliance with applicable laws, regulations, company policies and procedures at all times. You should promote legal compliance amongst your co-workers.

HTW is committed to the principles of free and fair competition; we will always compete vigorously but fairly and comply with all applicable competition laws.

HTW are constantly reviewing and revising our processes and governance structures to better ensure compliance with Australian legislation.



BREACHES OF THE CODE OF CONDUCT

Any breach of this Code of Conduct is a serious matter and may give rise to disciplinary action, up to and including termination of employment or legal action. If you are aware of, or suspect, any serious misconduct or unethical behaviour against yourself or towards a co-worker, client or stakeholder that contravenes or has the potential to breach this Code of Conduct, you must report this to your Manager or Director and cooperate as required with investigations of possible breaches, as contained within Procedures such as the *'Employee Complaints and Investigations Procedure'*.

Should you not feel comfortable reporting breaches to your Manager or Director, you are able to report breaches confidentially through the National Office via the People & Comms Team, General Counsel or directly to the CEO. Refer to the *'Whistle-blower Protection Policy and Procedure'* for more on this.



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UNCONTROLLED WHEN PRINTED

You have acknowledged this policy in 16/02/2021 at 09:45:13 (UTC +11:00)

Unless the Policy specifically states otherwise, the Policy does not form part of your employment agreement with the Employer. The Employer may unilaterally vary, remove or replace this Policy at any time. To the extent that this Policy imposes any obligations on the Employer and/or purports to provide any right or benefit to you, those obligations are not contractual and do not give rise to any contractual rights. The Employee is required to be familiar with the content of the Policy and comply with the terms at all times.

Note: We are not able to attach the digital signatures to any documents besides an unlocked pdf file.