



**AIMS Funds Management**  
A Member of AIMS Financial Group

# CODE OF CONDUCT

October 2023

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## **1. Purpose of the Code of Conduct**

AIMS Financial Group (AIMS) is a diversified investment and financial services group.

The Code of Conduct (Code) document has been prepared to ensure that team members adhere to a strict regime of fiduciary responsibility and its objectives are outlined below:

- The nurturing of a team approach to the attainment of the business objectives;
- The maintenance of the highest levels of integrity and commitment to client confidentiality;
- The commitment to uncompromising levels of customer service; and
- Aiming to be the best in all facets of our business.

## **2. Who the Code Applies To**

All employees (including directors, senior executives and contractors) are required to observe the Code and to act with the utmost integrity, objectivity, ethics, responsibility and in compliance with the law and the company policies at all times in their dealings with each other, competitors, customers, suppliers, the company and the community.

The Code is discussed with each new employee as part of their induction training and if there are any further questions regarding the Code or any of AIMS' policies, employees should not hesitate to contact their Manager or the Company Secretary.

## **3. Core Values**

Employees should observe the highest levels of professional conduct in undertaking their business activities, in light of the core values of:

- Trust
- Integrity
- Honesty
- Respect

## **4. Expected Conduct of Employees**

Employees are expected to conduct their business affairs in accordance with this Code by:

- acting in the best interests of unitholders over and above their own interests
- acting honestly and with high standards of personal integrity
- complying with the laws, regulations and internal policies, including in relation to the conflicts of interest

- treating fellow staff members with respect and not engage in bullying, harassment or discrimination
- dealing with customers, unitholders and service providers fairly
- acting ethically and responsibly, including not knowingly participate in any illegal or unethical activity
- preserving unitholder confidentiality and not misusing information at all times.
- protecting and promoting the integrity of the market
- avoiding and/or disclosing any real or perceived conflicts of interest between their own personal interests and their duties as director, senior executive or employee, and dealing appropriately with such conflicts
- not taking advantage of the property or information of AIMS, its customers or unitholders for personal gain or causing detriment to AIMS, its customers or its unitholders
- not taking advantage of their position or the opportunities arising therefrom for personal gain
- reporting breaches of the Code to the Company Secretary or Compliance Officer

## **5. Conflicts of Interest**

A conflict of interest arises once an employee's loyalties are divided to the extent that they may be perceived to interfere with the performance of their duties and responsibilities to AIMS. This may make it difficult for the employee to perform their role objectively and effectively.

Employees must act in the best interests of AIMS and not allow themselves to be compromised by personal interests or interests of family or friends.

Each employee is responsible for identifying conflicts, whether actual or potential, that arise during their course of business or employment and to manage the risk of conflicts of interests, employees must notify the Company Secretary or the Compliance Officer of them as soon as possible.

For further information regarding conflicts of interests and related party transactions, refer to our Conflict of Interest and Related Party Transactions Policy.

## **6. Bribes**

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal, unethical or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage and can take the form of gifts, loans, fees, rewards or other advantages.

Employees are not permitted to give, offer, promise, accept, request or authorise a bribe, whether directly or indirectly.

Employees are not permitted to give, offer or promise a facilitation payment, whether directly or indirectly. A facilitation payment is a form of bribery made for the purpose of expediting or facilitating the performance of a public official for a routine governmental action in order to expedite performance of duties of a non-discretionary nature.

AIMS makes donations to political parties from time to time, and all political donations must be disclosed in the relevant annual report, the Australian Electoral Commission and state electoral authorities as required. Individual political donations by employees must be approved by the Managing Director.

## **7. Gifts and Entertainment**

Generally, gifts and entertainment given to or received from persons who have a business relationship with AIMS that are modest in value and appropriate to the business relationship may be accepted.

As a guide, you may only accept gifts and entertainment when they are offered on good faith, designed for a genuine and legitimate business purpose, are reasonable and proportionate in amount, and not intended to induce or reward you to act improperly.

A gift or entertainment beyond a business luncheon, dinner or theatre ticket to the value of \$500 pa per relationship should be referred to the Company Secretary for noting and approval.

However, gifts and entertainment should never be accepted or offered if:

- there is the intention to win business or influence business judgment;
- there is the possibility of a conflict of interest;
- the appearance of impropriety may arise;
- they are excessive and unreasonable
- they are in the form of cash or cash equivalents.

Employees must understand that any behavior contrary to this section not only contravenes the Code but also anti-bribery laws in Australia and other countries which may lead to serious penalties.

If there is any uncertainty regarding the appropriateness of any gift, employees should immediately check with their Manager, Compliance Officer or the Company Secretary.

## **8. Consequences of Breaching the Code**

AIMS recognises that breaches of the Code will inevitably occur but AIMS expects any breach to be unintentional and involuntary.

Employees must understand that breaches of the Code may result in disciplinary action including termination of employment. Breaches identified are to be escalated to the Company Secretary or the Compliance Officer, and any material breaches will subsequently be reported to the Board. AIMS will act objectively in assessing the appropriate penalty with regards to the nature of the breach.

## **9. Whistleblower Protection**

AIMS encourages employees to report any actual or suspected unethical behavior including breaches of AIMS' Code and policies. Such matters will be thoroughly investigated by AIMS.

AIMS is committed to protecting employees against any form of discrimination, harassment or victimisation in these situations and ensuring that concerns can be raised in confidentiality without any consequences to the extent permitted by the law.

Employees must ensure that any report must be made in good faith and that there are reasonable grounds for believing that there has been a breach of the relevant policies or Code. Any allegations that are made unsubstantiated or have been made maliciously will be viewed as a breach of the Code.

For further information regarding whistleblower protection, refer to our Whistleblower Policy.

## **10. Review of the Code**

This Code will generally be reviewed periodically to ensure it remains consistent with the core values of AIMS and that it is operating effectively.