Code of Conduct and Ethics Policy



GENISTAR
Financial Freedom For All

Version Control

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1) Introduction and Purpose

The purpose of this Code is to set out the standards of ethical and professional conduct expected of those working for, providing services to, or representing Genistar.

Genistar is committed to conducting its business honestly, fairly and with integrity, and to treating employees, Representatives, customers, business partners and others with dignity and respect.

This Code supports a culture of openness, trust, accountability and ethical decision-making and explains the standards expected when carrying out activities in connection with Genistar.

2) Workplace Principles

Our values reflect how we conduct our business and the standards we expect from those working for or representing Genistar.

These core values are as follows:

- Honesty and Integrity
- Passion for our clients' success
- The relentless pursuit of excellent service
- Openness and respect
- Innovation in our business practices and client services
- Commitment to providing personal growth and leadership opportunities
- Accountability to create value for our employees, Representatives, clients, partners and providers

3) How can the Code of Conduct Help You?

The Code is intended to help you:

- Conduct yourself honestly and ethically
- Uphold Genistar's values and protect our reputation
- Understand what Genistar expects of you
- Make good decisions on a daily basis
- Comply with the laws, regulations and standards applicable to our company
- Understand where to go for assistance or guidance if you have any questions

4) Who Does the Code of Conduct Apply To?

This Code applies to Genistar employees and, where expressly applicable, to Representatives and other individuals providing services to Genistar.

For Representatives, the standards within this Code apply in connection with their activities as a Representative and should be read alongside the Independent Business Agreement and any other applicable Genistar policies or standards notified to them.

Suppliers, consultants, contractors and other business partners acting for or on behalf of Genistar are also expected to meet the standards applicable to their relationship and activities with Genistar.

5) What You Need to Do?

Everyone to whom this Code applies is expected to:

- Understand and comply with this Code and any other policies, standards or requirements applicable to their relationship and activities with Genistar.
- Act honestly, ethically and with sound judgement.
- Comply with applicable laws, regulations and regulatory requirements.
- Seek guidance where you are unsure about the appropriate course of action.
- Remain alert to conduct that may be inconsistent with this Code, applicable policies or the law.
- Raise concerns promptly through the appropriate Genistar reporting channel.

6) Compliance, Code of Conduct and Ethics

6.1. Uphold the Law

Everyone to whom this Code applies is expected to comply with the laws, regulations, regulatory requirements and Genistar standards applicable to their activities.

If you are unsure whether an action is permitted, seek appropriate guidance from the Compliance Department before proceeding. Any suspected breach of the law, regulation or this Code should be raised promptly through the appropriate Genistar reporting channel.

6.2. Background to Ethics

Ethical conduct means acting honestly, fairly and responsibly, applying sound judgement and considering the impact of decisions on others, Genistar and its customers.

The key principles underlying this Code are:

- Integrity and trust
- Ethical business practice
- Open and honest communication
- Responsible decision-making

6.2.1 Integrity - Building Trust and Credibility

Genistar's success is dependent on the trust and confidence earned from our employees, Representatives, customers, business partners and others with whom we interact. We build credibility by honouring our commitments, acting honestly and with integrity, and pursuing Genistar's objectives through ethical conduct.

When considering any action, it is wise to ask:

- Will my actions build trust and credibility for Genistar?
- Will my actions support Genistar's long-term success?
- Am I able to fulfil the commitment I am making?

If the answer to any of these questions is unclear or causes concern, pause and seek appropriate guidance before proceeding.

Examples of Positive Behaviour and Negative Actions

Positive	Negative
Establishes trust in all professional relationships	Acts in a way that undermines trust in professional relationships
Acts in the best interests of clients, making decisions based on ethical principles and sound professional judgement	Allows personal or financial interests to improperly influence judgement or decisions
Acts honestly, objectively and impartially	Knowingly withholds, misrepresents or distorts relevant information
Recognises the limits of their knowledge or competence and seeks appropriate guidance where necessary	Acts outside their knowledge or competence without seeking appropriate guidance
Considers the interests of clients, Genistar and applicable regulatory standards when carrying out their activities	Fails to consider relevant professional, ethical or regulatory standards

6.2.2 Business Practice

Ethical business practice is the responsibility of everyone to whom this Code applies.

Examples of Positive Behaviour and Negative Actions

Positive	Negative
Complies with applicable laws, regulations and regulatory requirements	Fails to comply with applicable laws, regulations or regulatory requirements
Complies with applicable professional, ethical and regulatory standards	Fails to follow applicable professional, ethical or regulatory standards
Uses sound professional and ethical judgement where specific guidance is not available	Acts without considering relevant ethical principles where specific guidance is not available
Maintains appropriate awareness of regulatory and industry developments relevant to their activities	Fails to maintain appropriate awareness of relevant regulatory or industry developments
Completes any training, competency or professional development requirements applicable to their role or authorised activities	Fails to complete applicable training, competency or professional development requirements
Uses appropriate information and evidence when carrying out analysis or making recommendations	Relies on assumptions where relevant information or evidence should reasonably be considered
Uses appropriate judgement and initiative when carrying out their activities	Fails to take appropriate responsibility for their own conduct and obligations

6.2.3 Create a Culture of Open and Honest Communication

Genistar encourages open and honest communication and wants individuals to feel able to raise genuine concerns. Those with leadership, oversight or regulatory responsibilities should support an environment in which concerns can be raised appropriately and without retaliation.

Examples of Positive Behaviour and Negative Actions

Positive	Negative
Listens to and appropriately considers information and views provided by clients and others	Dismisses or fails to appropriately consider relevant information or views
Communicates professionally and respectfully with clients and others	Communicates in an unprofessional or disrespectful manner
Communicates information clearly and appropriately	Communicates in a way that is unnecessarily unclear, misleading or inappropriate for the audience
Provides written information clearly, accurately and appropriately	Fails to communicate or record important information appropriately where required
Provides clear and reasoned explanations where appropriate	Provides information without appropriate explanation or reasoning where this is required
Handles complaints, concerns and objections appropriately and professionally	Fails to consider the circumstances, applicable requirements or interests of the client when handling a complaint or concern

6.2.4 Decision Making

At Genistar, we are committed to doing the right thing at all times. If you are unsure of the best action to take in any situation, always ask yourself:

- Is it consistent with our Code?
- Is it legal?
- Does it follow our policies?
- Does it benefit Genistar as a whole – not just a certain individual or group?
- Would I be comfortable if my actions were made public?

If the answer to any of these questions is unclear or causes concern, pause and seek appropriate guidance before proceeding. These questions are intended to support good judgement and do not replace any applicable legal, regulatory, contractual or policy requirements. If you are unsure or need guidance, please contact the Business Integrity Department at business.integrity@genistar.net.

Examples of Positive Behaviours and Negative Actions

Positive	Negative
Considers relevant information from appropriate sources before reaching a decision	Makes decisions without appropriately considering relevant information
Considers the potential risks, benefits and consequences of different courses of action	Acts without considering the consequences
Uses appropriate judgement where information is incomplete or inconsistent and seeks guidance where necessary	Makes assumptions or proceeds without seeking appropriate guidance where this is necessary
Responds appropriately to new information, feedback or changing circumstances	Disregards relevant new information, feedback or changing circumstances

6.3. Competition

Genistar is committed to fair and lawful competition. Everyone to whom this Code applies must comply with applicable competition law and must not participate in improper arrangements, payments or practices intended to obtain an unfair business advantage.

Representatives must also comply with any competition, business activity and other relevant obligations contained within the Independent Business Agreement.

6.4. Confidentiality

During your relationship with Genistar, you may have access to confidential or commercially sensitive information relating to Genistar, its clients, Representatives, employees, suppliers, providers or business partners. Such information must be protected and must not be used or disclosed except where authorised or otherwise permitted or required by law.

Examples may include:

- business processes, methodologies and intellectual property
- non-public financial or commercial information
- client and customer information
- business plans, objectives and strategies

- contracts and agreements
- commercially sensitive information relating to suppliers, providers or business partners
- personal data and other information requiring protection under applicable data protection requirements

Obligations relating to confidential information may continue after an individual's employment, engagement or other relationship with Genistar ends, where required by the applicable agreement or by law.

6.5. Selective Disclosure

You must not disclose non-public or confidential information relating to Genistar, its business, financial position, plans, operations or other commercially sensitive matters unless authorised or otherwise permitted or required by law. Care must also be taken when preparing presentations, proposals or other communications to ensure that confidential information is not disclosed inappropriately.

6.6. Avoid Conflicts of Interest

Everyone to whom this Code applies must identify and appropriately manage any actual, potential or perceived conflict of interest relevant to their activities with Genistar.

Personal, financial, professional or other interests must not improperly influence decisions or activities carried out in connection with Genistar.

Where a potential conflict arises, it must be disclosed through the appropriate Genistar reporting channel and handled in accordance with the applicable Conflict of Interest Policy or contractual requirements. Representatives must also comply with any conflict-of-interest obligations contained within the Independent Business Agreement.

Listed below are some examples of how conflicts of interest may arise:

- You or a member of your family holding a position or an affiliation with a competitor, client or provider of Genistar
- You undertake other activities that create an actual or potential conflict with your obligations to Genistar
- You use information, property or business opportunities obtained through your relationship or activities with Genistar for personal benefit
- Hiring or supervising family members or closely related persons
- Serving as a board member for an external commercial company or organisation
- Owning or having a substantial interest in a competitor, supplier or contractor
- Accepting gifts, discounts, favours or services from a client, potential client, competitor, supplier or other third party where this could improperly influence, or reasonably appear to influence, a business decision

- You are in a direct reporting relationship with a close relative or otherwise have influence over a close relative's hiring, compensation or other material aspect of their role at Genistar
- You represent another regulated company that offers a service similar to Genistar
- The list above is not exhaustive and you should use your best judgement to determine whether a particular situation gives rise to a conflict of interest

6.7. Gifts and Hospitality

Gifts, hospitality, meals, entertainment or other business courtesies must comply with Genistar's Gifts and Hospitality Policy, including any applicable financial limits, declaration and approval requirements.

A business courtesy must never be offered or accepted where it could improperly influence, or reasonably appear to influence, a business decision or create an unfair business advantage. Cash gifts must not be offered or accepted.
Any required declarations or approvals must be made in accordance with the Gifts and Hospitality Policy.

7) Safety and Security

Everyone to whom this Code applies has a responsibility to act appropriately in relation to safety and security when carrying out activities connected with Genistar. Any safety or security concern should be raised promptly through the appropriate Genistar reporting channel.

7.1. Drugs and Alcohol

No individual may undertake Genistar-related activities, attend Genistar premises or events, or interact with clients or third parties in connection with Genistar while impaired by alcohol or illegal drugs.

Where alcohol is permitted at a Genistar event, everyone attending is expected to behave responsibly and comply with applicable law and standards of conduct.

7.2. Violence, Threatening and Intimidating Behaviour

Threatening, intimidating, hostile or violent behaviour is strictly prohibited in connection with Genistar activities, premises, events or business.

Weapons, firearms or explosives must not be brought onto Genistar premises or to any Genistar-related event or activity.

7.3. Whistleblowing

Genistar encourages individuals to raise genuine concerns about suspected wrongdoing. Genistar does not tolerate retaliation or detrimental treatment against anyone who raises a genuine concern in good faith.

Please refer to Genistar's Whistleblowing Policy for information about the concerns covered by that policy, the appropriate reporting routes and how concerns will be handled. Concerns may be raised with the Business Integrity Department at business.integrity@genistar.net or through any other reporting route set out in the Whistleblowing Policy.

8) Violations or Concerns of The Code

Breaches of this Code will be taken seriously and may result in appropriate action, taking account of the circumstances and the individual's relationship with Genistar.

Employees only: A breach of this Code may be addressed under Genistar's Disciplinary Policy and Procedure and could result in disciplinary action, up to and including dismissal.

Representatives: The employee disciplinary process does not apply to Representatives. Failure by a Representative to meet applicable standards may affect their ability to continue representing Genistar and may result in action in accordance with the Independent Business Agreement or other applicable Representative agreement.

Other individuals and organisations: Concerns involving suppliers, consultants, contractors or business partners will be considered in accordance with the applicable contractual arrangement and the circumstances of the matter.

8.1. Reporting a Concern or Violation

If you are asked to do something that you believe may breach this Code, applicable law or Genistar's standards, or if you become aware of conduct that may do so, raise the concern promptly through the appropriate Genistar reporting channel.

Concerns relating to discrimination, harassment, sexual harassment, victimisation, threatening or intimidating behaviour should be raised in accordance with Genistar's Equality, Respect & Professional Conduct Policy.

8.2. What Happens When You Report a Concern?

- Concerns will be taken seriously and considered appropriately.
- Information will be handled sensitively and confidentially as far as reasonably practicable.
- Information may be shared where reasonably necessary to review or investigate a concern and take appropriate action.
- Everyone involved is expected to cooperate appropriately and honestly with any review or investigation applicable to them.
- Where a concern is substantiated, appropriate action will be considered having regard to the circumstances and the individual's relationship with Genistar.

8.3. No Retaliation

Genistar does not tolerate retaliation against anyone who raises a genuine concern in good faith or cooperates with a review or investigation. Raising a concern in good faith will not itself result in adverse action simply because the concern is subsequently not substantiated.

8.4. What is Retaliation?

Retaliation includes adverse or detrimental treatment because someone has raised a genuine concern in good faith or participated in a review or investigation. It may include threats, intimidation, harassment, unfair treatment or other action intended to discourage someone from raising or supporting a concern.

Protection from retaliation does not prevent Genistar from taking appropriate action in relation to an individual's own misconduct or breach of applicable obligations.

9) Amendments

Everyone to whom this Code applies is expected to read, understand and comply with the standards that apply to their relationship and activities with Genistar. This includes an expectation that individuals will:

- act honestly, fairly, ethically and with integrity;
- treat others fairly and with dignity and respect, including regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation;
- act in the best interests of clients when carrying out client-related activities;
- comply with applicable laws, regulations, professional standards and regulatory requirements;
- maintain the knowledge and competence required for their role or authorised activities and complete any applicable training, competency or continuing professional development requirements;
- only undertake activities for which they have the appropriate knowledge and competence, seeking guidance or support where required;
- protect confidential information and personal data and not use or disclose such information without appropriate authority, except where permitted or required by law;
- identify, disclose and appropriately manage any actual, potential or perceived conflict of interest;
- not use their position, relationship with Genistar or information obtained through their activities to secure an improper benefit for themselves or others;
- provide accurate and complete information in connection with qualification, licensing and regulatory requirements; and
- raise genuine concerns about suspected misconduct, unlawful activity or breaches of applicable standards through the appropriate Genistar reporting channel.

Representatives must also comply with the Independent Business Agreement and any applicable Genistar policies, standards and requirements notified to them in connection with the representative services they provide under the Independent Business Agreement.

10) Code Compliance and Audit

Genistar may review or investigate suspected breaches of this Code and take appropriate action in accordance with the circumstances and the individual's relationship with Genistar.

Employees only: Where an employee is found to have breached this Code, the matter may be addressed under Genistar's Disciplinary Policy and Procedure and could result in disciplinary action, up to and including dismissal.

Representatives: Genistar's employee disciplinary process does not apply to Representatives. Where a Representative fails to meet applicable standards, this may affect their ability to continue representing Genistar and may result in action in accordance with the Independent Business Agreement or other applicable Representative agreement.

Suppliers, consultants, contractors and business partners: Any breach will be addressed in accordance with the applicable contractual arrangement and the circumstances of the matter.

Genistar may review its procedures and compliance arrangements where appropriate and proportionate.

Anyone who is unsure how this Code applies to them should contact the Business Integrity Department at business.integrity@genistar.net.

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