

## Hastings Funds Management Limited

### Hastings Code of Conduct

This Code applies to all Hastings' employees and contractors and it is supported by Hastings' Board.

#### **1. We act with honesty and integrity**

We are constantly judged by how we act. Our reputation will earn the respect it deserves if we act with honesty and integrity in all our dealings and do what we think is right at all times, within the legitimate role of the business.

Examples of the way we achieve honesty and integrity in our actions include:

- We do not tolerate dishonest behaviour by our colleagues or clients.
- We give accurate, honest and complete information to and about our clients and other parties while ensuring we respect our privacy obligations.
- We abide by all terms and conditions of our employment contracts and Hastings' policies.
- We take responsibility and are accountable for all Hastings' resources and property used in the performance of our duties. We avoid wastage.
- We do not use funds, information or property of Hastings or its clients for our own benefit, nor do we assist others in such behaviour.

#### **2. We respect the law and act accordingly**

It is essential that we comply with the laws and regulations in all countries in which we operate. Violations of laws and regulations can have serious consequences for Hastings and the individual concerned (including criminal, civil and administrative sanctions). We comply with laws and regulations, not simply because they are law but because it is right to do so.

Examples of the way we achieve this principle include:

- We comply with Hastings's internal standards, which help us meet our ethical, legal and regulatory obligations and minimise risk to ourselves and Hastings.
- We respect the customs and business practices of the countries in which we operate, but do not compromise the principles embodied in this Code.

- We responsibly discharge our authority (if any), to sign documents on behalf of Hastings. Our signature indicates that we have understood the nature of the document being signed, and that it has been properly reviewed and authorised.
- We understand and act within our authority.
- We do not make services or products available if we know or suspect that they will be used in relation to illegal activities.
- We immediately notify our manager, the Managing Director or the Company Secretary and Head of Compliance of any breach of the law or any Hastings' policies by any Hastings' employee.
- We do not trade in securities if we have access to price-sensitive information not generally available to the public about any company's shares or securities.
- We respect the property rights of others.

### **3. We respect confidentiality and do not misuse information**

We treat as confidential Hastings' business affairs and those of our clients, colleagues and business associates. We comply with laws which govern the use and disclosure of information, including privacy laws.

We ensure that confidentiality is maintained and information is not misused. Some examples of the way we do this include:

- When we join Hastings we commit to keeping confidential, information which we learn about Hastings, our clients and business associates during our employment. We maintain this confidentiality even after we have left Hastings.
- We do not encourage or pressure others to disclose confidential, sensitive or privileged information, including individual remuneration details.
- We do not use confidential information for personal gain, or for the gain of others such as friends, relatives or business associates.
- We access confidential information only for authorised work-related tasks.

### **4. We value and maintain our professionalism**

Professionalism is conduct which fosters and preserves our reputation as individuals and the reputation of Hastings. It is more than simply conducting ourselves ethically. Professionalism involves the pursuit of excellence, as we strive to achieve the highest quality in our work.

As Hastings employees we must always act in an ethical and professional manner. If we compromise this principle, we may lose the respect and confidence of our colleagues, clients and business partners.

Examples of the way we fulfil this responsibility include:

- We take responsibility and are accountable for the decisions we make in performing our duties.
- We maintain and strive to improve the skills, knowledge and competencies that are required for our position.
- We limit any advice to clients to factual explanations which we are competent to provide, or to such financial or other advisory services as we are expressly authorised to provide.
- We are committed to diversity, fairness and equal employment opportunities.
- We will not participate in activities (such as gambling, or drug or alcohol use), either on work premises or during work hours, or outside of work, that adversely affect the performance of our duties.
- We do not tolerate bullying or harassment (including offensive language), or unlawful discrimination.
- We do not initiate or perpetuate rumours.

## **5. We act as a team**

We work together as a team and treat each other with respect and dignity, promoting an environment that enables our team to reach its full potential.

Examples of how we promote teamwork include:

- We each take responsibility for the tasks assigned to us.
- We share the workload and make a contribution, including stretching ourselves to complete tasks when required.
- We engage in constructive debate about proposals and ideas, listen to each other's views but accept and support final decisions once they are made.
- We maintain up to date records on our current procedures and internal processes so our colleagues know what we have done and why we have done it.

## **6. We manage conflicts of interest responsibly**

Managing conflicts of interest is key to maintaining our clients' loyalty and building business through trust.

A conflict of interest occurs where employees have a personal or professional interest sufficient to influence, or appear to influence, the objective performance of their duties and responsibilities to Hastings.

We do not, therefore, participate in activities that involve a conflict between our duties and responsibilities, or which are prejudicial to the business of Hastings. We also do not put ourselves in a position of conflict with the best interests of our clients or a position which unfairly puts the interests of one client above another's, regardless of the nature or size of their relationship with us, be it personal or business.

Some examples of how we manage conflicts of interest include:

- We seek the consent of senior management before accepting a directorship on the board of a non-Hastings company.
- We disclose any material interests we have in our clients to our manager and we do not manage client relationships where we have such an interest.
- We do not participate in business activities outside our employment in Hastings (whether as a principal, partner, director, agent, guarantor, investor or employee), without the approval of management, or when it could adversely affect our ability to carry out our duties and responsibilities to Hastings.
- We do not solicit, accept or offer money, gifts, favours or entertainment which might influence, or might appear to influence, our business judgment.
- We place the interest of our clients first and only recommend clients move their funds to new accounts or purchase new products or services when it is in their best interests to do so.

## **7. We strive to be a good corporate citizen and achieve community respect**

We uphold Hastings' commitment to good corporate citizenship while pursuing its business objectives.

Examples of how we uphold this commitment include:

- We involve ourselves in and strive to make a contribution to the community.
- We consider the broader impact of our decisions on our colleagues, clients and community.
- We act fairly and reasonably towards our clients and potential clients in a consistent and ethical manner.

## **8. Your responsibilities under the Code**

Each of us has a responsibility to abide by this Code and its principles, and to report breaches of the Code to our manager, the Managing Director or Company Secretary and Head of Compliance. If you are unsure whether an action is a breach of this Code, raise the matter with your immediate manager or the Company Secretary and Head of Compliance.

Employees and contractors who breach this Code of Conduct may face disciplinary action including termination of employment.