



Code of conduct →

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1. Message from Avenue Bank's CEO

Avenue's vision is to be the leading digital business bank in Australia.

The Avenue Team has passion and respect for Australian small businesses, specifically the hardworking business owners and staff who work tirelessly to serve our communities and who are the engine room of the Australian economy. We are focused on delivering digital access to cashflow solutions that allow our customers to grow and prosper in all environments. We are committed to working with businesses fairly and honestly to ensure their continued success.

To achieve this vision, we have developed core values that are the "Avenue way" of doing things. We live and breathe these behaviours – they always guide our thinking:

- **Think big:** We have an entrepreneurial mindset. A trailblazer with fresh ideas and a passion to change things for the better.
- **Play as one team:** We listen, we're respectful and bring out the best in each other.
- **Do good:** We're fair, ethical, and transparent. We earn trust.
- **Find a way:** We're quick on our feet, insightful and adaptable, and believe there's always a better way.

Our Code reflects our commitment to innovation, integrity, and our focus on customer-centricity. Please read and follow this Code carefully, your decisions and actions have a direct effect on our customers, partners, communities, and shareholders that our business connects with each day. In conjunction with this Code, there are a broad range of policies and procedures that reflect and support this Code, and I encourage you to ensure you are familiar with these documents.

Upholding the behaviours and actions of the Code is core to how we function as a business together and as individuals. If something doesn't feel right – I encourage you to speak up to your line manager or to the risk and compliance team. Please reflect on these principles and policies and how they can guide you in your daily interactions; to make good decisions, act with integrity and support your colleagues to do the same. I am proud to lead Avenue Bank in our quest to be the leading digital business bank in Australia.



George Confos
Chief Executive Officer

2. Purpose of the code

Avenue Bank Ltd and Avenue Hold Ltd (collectively Avenue), are committed to high standards of corporate governance and professional behaviour. This Code outlines those standards that govern the activities of Avenue.

This Code applies to all staff which includes directors, officers, staff members, contractors, consultants and is supported by policies that govern how we behave, react, and manage our business.

3. Our responsibilities

Staff will:

- act in compliance with this Code and Avenue's other policies;
- report any actual or potential breaches of law, this Code or Avenue's other policies;
- if ever in doubt, seek advice immediately.

Failure to comply with this Code may breach the law and, in the case of any Staff, may result in disciplinary action including termination of engagement. Refer to Avenue's Consequence Management Policy.

The directors of Avenue will:

- review and refine this Code from time to time considering regulatory requirements, market practices and stakeholder expectations.

4. Our values

Avenue's foundation is built on four key values, which continue to guide us:

- **Think big:** We have an entrepreneurial mindset. A trailblazer with fresh ideas and a passion to change things for the better.
- **Play as one team:** We listen, we're respectful and bring out the best in each other.
- **Do good:** We're fair, ethical, and transparent. We earn trust.
- **Find a way:** We're quick on our feet, insightful and adaptable, and believe there's always a better way.

4.1 Does this fit Avenue?

Consistent with maintaining our foundation is ensuring our decisions align with our values and our Code of Conduct. This is where we ask ourselves "Does this fit Avenue?"

- Does the decision align to Avenue's values?
- Does the decision comply with Avenue's policies?
- Who will the decision affect and what is the impact to them?
- Does the decision support Avenue's goals?
- Am I being clear and concise?

5. Speaking up

Avenue Bank fosters a culture of trust, transparency, and collaboration. Guided by integrity, we encourage you to speak up, to actively listen and to work closely with colleagues at all levels to deliver exceptional outcomes for our customers. We value respect and are committed to our individual and collective development.

We are committed to maintaining fairness, ethical practices, and transparency. Where mistakes are made or observed, you are encouraged to speak up and be accountable. Everyone makes mistakes but errors and omissions must not be concealed.

Avenue encourages you to be confident to ask questions, to challenge status quo and practice and change things for the better. If you feel under pressure to act in a way which is inconsistent with the Code, or which conflicts with our policies, speak up.

If you genuinely believe that someone is not adhering to the Code, you have a responsibility to report immediately any breaches to your Manager or an appropriate member of the Executive Team.

You can expect Avenue to provide an environment where no staff member is subjected to retaliation or victimisation for reporting or escalating genuine concerns of suspected misconduct.

6. Avenue's expectations

6.1 Professional behaviour

Avenue's reputation is one of our most valuable assets therefore all staff are expected to behave in a manner consistent with Avenue's brand values.

We will at all times act in a professional, ethical, and transparent manner to ensure that we do good and continually earn trust. The way we conduct ourselves both at work and outside of work, should reflect positively on ourselves and Avenue.

All staff must commit to:

- act with honesty and integrity;
- act ethically and responsibly;
- comply with all laws and regulations that apply to Avenue's business;
- manage conflicts of interest responsibly and according to our policy;
- protect the confidentiality of our affairs and those of our customers and business partners and prevent the misuse of information;
- respect the privacy of our customers, business partners and investors;
- act with due regard for people's rights and wellbeing. Sexual or psychological harassment will not be tolerated in any form. Sexual harassment includes any form of unwelcome and uninvited words, or conduct of a sexual nature that a reasonable person would find offensive, humiliating, intimidating, or embarrassing;
- act with tolerance, forbearance and an open mind. Racial or religious vilification or intimidating or bullying behaviour will not be tolerated. Staff may not engage in behaviour which excludes others based on age, gender, religion, nationality, or sexual orientation; and
- comply with work, health, and safety standards, take care to protect own health and safety and consider the health and safety of others.

6.2 Avenue's commitment

Avenue is committed to providing a safe and injury-free workplace that values equal opportunity, is free from discrimination, harassment and victimisation and does not tolerate inappropriate workplace behaviour.

Avenue is committed to treating all staff fairly and with dignity and respect and ensuring that no person is discriminated against based on their race, ethnicity, sex, gender, gender identity, intersex status, sexual orientation, age, physical or mental disability, marital or relationship status, family responsibilities, pregnancy, religion, political opinion, national extraction, or social origin.

6.3 Fraud

Doing good is integral to Avenue and its success is dependent on the trust of its customers. All staff are expected to be aware of fraud risks and alert to fraudulent activity within their area of responsibility. If you have reason to suspect or become aware of any fraudulent activity, the issue must be immediately reported. As a first step, you should speak with your manager, or if it is not appropriate to do so, you should raise with a member of the Executive Team. All instances of actual, suspected, or alleged fraud will be dealt with seriously and investigated appropriately.

You must not give, offer, promise, accept, request, or authorise a bribe whether directly or indirectly, on behalf of, or for the benefit of, Avenue. A bribe may be in the form of cash, gifts, entertainment, or other benefits that is not legitimately due. The actual or attempted use of any form of bribery or corruption either directly or indirectly on Avenue's behalf to advance its business interests or those of its associates is strictly prohibited.

6.4 Conflicts of interest

A conflict of interest is where some or all the interests of Avenue's customers, staff, directors, or contractors are inconsistent with, or diverge from, some or all the interests of Avenue Bank.

Avenue is committed to acting honestly and with integrity in all situations and where possible to avoid situations that may involve a conflict of interest. All staff must disclose any personal or business activities or interests (including any other employment) which may give rise to a conflict of interest.

6.5 Confidential information and privacy

Avenue is committed to maintaining the confidentiality and privacy of information relating to Avenue, its staff, and its customers.

In managing our customer relationships, we may come into the possession of confidential information and/or non-public price sensitive information (inside information). Avenue is committed to ensuring that all confidential information entrusted by its customers and other third parties is only used for the purposes for which they are supplied and in accordance with the law.

6.6 Electronic device usage

Avenue's IT systems and environments are to be used to perform authorised and lawful business activities for Avenue, and must not be misused in any unlawful, inappropriate, or offensive manner.

Avenue supports work-life balance and the personal use of Avenue's technology and communication facilities, provided it is not misused or interferes with Avenue's business operations. It must not be used to transmit inappropriate material and messages such as chain emails, or to access inappropriate internet sites such as internet gambling or sites which contain sexual content.

6.7 Compliance with laws and policies

Avenue is committed to complying with its legal obligations and regulatory requirements and we have developed internal policies to support this. All Avenue policies are available in the Avenue Policies SharePoint. Any staff needing assistance in understanding how we comply with the laws and policies should speak to his/her manager or the Risk & Compliance Team.

6.7.1 Prudential standards

Avenue is authorised under the Banking Act 1959 which is the legislation underpinning the APRA requirements and is the main legislation covering banking services in Australia. The rules and supplementary guidance which govern the way Avenue does business are contained in the APRA Prudential Standards and Guidance Notes for ADIs. These are available on APRA's website <https://www.apra.gov.au/industries/1/standards>.

6.7.2 Anti-money laundering and counter-terrorism financing

Avenue is committed to ensuring that we are not used as a vehicle to facilitate the laundering of money and financing of terrorism and have established policies that set out governing principles and standards to protect Avenue.

6.7.3 Sanctions

Avenue complies with various international and domestic sanctions regimes which impose restrictions on activities that relate to particular countries and territories, goods and services, or persons and entities. Sanctions are punitive or coercive economic measures used by governments as a foreign policy tool to protect national and international security.

6.7.4 Anticompetitive conduct and fair competition

Avenue as an Australian Financial Services Licence holder is committed to compliance with anti-trust and competition laws and has established policies and procedures supporting compliance. These laws generally prohibit cartel conduct (or collusion), misuse of market power and other types of conduct that is anti-competitive and seek to protect market integrity, competition, and the competitive landscape.

6.7.5 Market integrity

Avenue's policies and procedures outline the expectations including the prohibitions against insider dealing, taking advantage of client order information, improper disclosure or misuse of information, market manipulation and/or misleading behaviour.



7. Breaches

A breach of the Code will be taken seriously and may result in disciplinary action including termination of employment or other legal action.

The CRO has the responsibility for the management of any investigation into alleged unethical conduct. Advice may be sought in relation to any alleged misconduct.

Investigations will be handled confidentially and with due regard to the principles of procedural fairness and Avenue's legal obligations and in line with the Consequence Management Policy.

At the discretion of the CEO and/or the Board, Avenue may impose the following sanctions on staff who are found to have breached the Code of Conduct:

- Counselling;
- Reprimand;
- Reassignment of duties;
- Suspension with/without pay; or
- Termination of employment.

Individuals are strongly encouraged to report any breach of the Code of Conduct to the CRO or the CEO.

No staff member will be victimised or discriminated against in any way for reporting alleged breaches of the Code of Conduct.

