



Code of Conduct

Contact information:
(02) 9842 4800
info@petsure.com.au
Document No. HR-POL-004.V1 Issue
Date: November 2019

PetSure 
For a life with pets



Contents

A message from our CEO	1
Introduction	2
Our values	3
Our standards	4
The Code of Conduct	5
Applying the Code	8

A message from our CEO, Alex Thomas



At PetSure, we aim to be Australia's most trusted partner when it comes to pet insurance.

We achieve this goal by aligning all our actions to the highest ethical and legal standards. This is our responsibility as a company and as individuals.

Our Values and Code of Conduct (the "Code") are a large part of who we are. They will guide us to where we are going, how we'll get there and how we'll behave along the way.

To help us achieve our goals and to ensure PetSure is a great place to work, we need to comply with our legal obligations and manage our business and our interactions in the right manner.

We expect our business partners, suppliers as well as our employees, including our Board members, to uphold the values, behaviours and standards contained within this Code.

We do this through:

- Upholding our values and achieving our standards
- Promoting a positive work environment
- Demonstrating honesty and integrity
- Acting professionally and ethically
- Maintaining the security of confidential and/or sensitive official information.

Importantly, everyone working at PetSure must uphold a working environment that promotes risk awareness and risk management. The PetSure Risk Model provides for a framework to assess strategic, insurance, operational, counterparty, customer and community, legal and regulatory/ compliance risk. As part of that, we conduct regular compliance meetings, provide risk reports, and encourage all our Employees to speak up if they identify any irregularities or concerns.

It is essential that we always act with integrity, honesty, and transparency. Everyone working in PetSure should expect to be treated, and must treat others, with respect, dignity and fairness.

I ask everyone working at PetSure to make themselves aware of the Code, and to implement and adhere to the Code's provisions and to the core values on which it is based.

Alex Thomas
Chief Executive Officer
PetSure

1. Introduction

1.1 Why do we have a Code?

The reason we have the Code is so there can be no doubts about the ethical and professional conduct that is required of everyone working at, and with PetSure.

The Code does not and cannot cover every situation that can arise in the workplace.

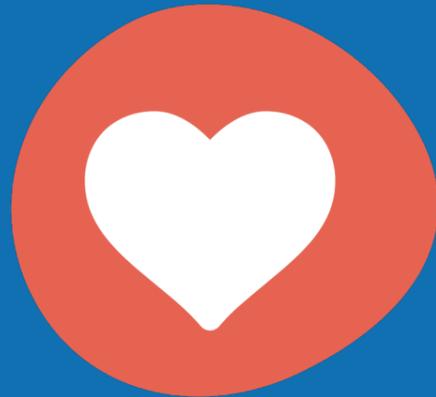
The Code does not replace the need for common sense in how our people conduct themselves.

Our leaders have a key role in ensuring our people understand the standards the Code sets and that it is applied consistently and fairly.

However, the most important responsibility of leaders, is to demonstrate the standards in the Code through leading by example.

The Code also provides guidance on how to raise and report breaches of the standards it sets.

Our values



PETS are at the heart of everything we do



We value and respect **PEOPLE**



We have **PASSION** for our business and we give a damn about what we do and how we do it

2. Our standards

Our values and standards represent who we are

2.1 At PetSure:

- Our behaviours are aligned to our values: **PETS** are at the heart of everything we do. We value and respect **PEOPLE**. We have **PASSION** for our business and we give a damn about what we do and how we do it.
- We value and look after each other, pet parents and our business partners.
- We are committed to delivering the best possible experience for our customers. We acknowledge that every decision and action we make every day has an impact. We strive to make our customers our first consideration.
- We're curious about the environments in which we work and are eager to learn from others. We respect individual differences, and everyone is treated with dignity, courtesy and respect.
- We embrace the unique diversity of our people.
- Our culture supports appropriate, safe, equitable and inclusive working environment.
- We represent PetSure honestly and we do business ethically and with integrity. We respect the privacy of each other and our customers.
- We will always protect the reputation of our brand and positively represent PetSure and our team.
- We are united in delivering on our promises.
- We respect the trust placed in us by our customers and strive to treat them as we expect to be treated.
- We're committed to fair and open dealings with our business partners and we expect our business partners to share PetSure's values.
- We're committed to continuously improving and being accountable, both in the provision of our services and how we interact with our pet parents, business partners and the community.
- We understand that it's everyone's responsibility to look out for the health and safety of others in the workplace.
- We have a "zero-tolerance" approach to modern slavery in our business and our supply chains. We're committed to the engagement of individuals who have capacity, are of legal age to work and have the free will to consent to work.
- We're committed to a transparent environment that enables PetSure to provide a sustainable future for us, pet parents, our partners and the broader community.
- We expect the highest standards of behaviour in every interaction with each other, pet parents and partners.
- We comply with the law and company policies.

We are united in delivering on our promises.



3. The Code of Conduct

Our code protects all of us every day

3.1 Promote a positive work environment

- Treat all customers with courtesy and respect and with due sensitivity to the needs of people with different backgrounds and cultures.
- Treat all other people in a way that promotes harmonious and productive working relationships, and a collaborative teamwork approach.
- Create a workplace free of behaviour that may be deemed as harassing or bullying towards our people, customers or members of the public, or discriminate against them based on gender identity, sexual orientation, age, colour, race, physical or intellectual disability, mental illness, marital status, family or carers' responsibilities, pregnancy, religion, political opinion or social origin.
- Attempt to settle any complaints, disagreements or grievances in the first instance through respectful conversation.
- We respect the trust placed in us by our customers and strive to treat them as we expect to be treated.

3.2 Demonstrate honesty and integrity

- Ensure that your actions and decisions are not influenced by self-interest or considerations of personal gain or other improper motives.
- Not accept any inducements that are intended to influence your decisions or actions.
- Be fair and responsible in your dealings.
- Not accept gifts where they are, or could be reasonably interpreted as being designed to secure influence or preferential treatment in favour of the giver.
- Ensure that you are free of any interest (financial or otherwise) which might be regarded as being in conflict or incompatible with your integrity.
- Not misusing confidential or private information.
- Act in a way which protects and promotes the interests of PetSure.
- Report to a more senior person any misconduct by others of which they become aware, such as corruption, and fraud.

3.3 Acting professionally and ethically

- Not be under the influence of alcohol or drugs when commencing work and while at work.
- Be in a fit and proper condition to carry out your duties at work.
- Comply with all lawful and reasonable directions.
- Avoid conduct that could bring PetSure or any of our people, or customers into disrepute, including when using social media.
- Only provide official comment on matters related to PetSure if authorised to do so.
- Report criminal charges and convictions.

3.4 Maintain the security of confidential and/or sensitive official information

- Be responsible for all activities which originate from your various work accounts (including where your account is accessed remotely).
- Keep confidential all personal information and records.
- Maintain the security of confidential and/or sensitive information, including that stored on communication devices.
- Exercise good judgment about what material appears online, and in what context.
- Take reasonable care of PetSure assets and abide by PetSure's Information Security Policy.
- Not use the PetSure internet and email resources for accessing, transmitting, storing or downloading pornographic, sexually explicit or otherwise inappropriate material.



4. Applying the Code

4.1 Who does the code apply to?

The Code applies to all PetSure's employees, including full-time, part-time, fixed/casual employees as well as work experience students, volunteers, temporary and permanent employees, apprentices, contractors and sub-contractors, and all other people performing work for PetSure such as our partners, suppliers and external stakeholders.

4.2 Responsibilities under the Code

Everyone is required to meet the standards of ethical behaviour and corporate conduct outlined in this Code both at the office premises and at any other time when an activity is being undertaken in connection with their employment or engagement, including outside the workplace.

4.3 What happens if there is a breach of the Code?

Breach of the Code may result in disciplinary action, which may include the termination of employment or engagement either with notice or summarily. Employees may also be personally liable for conduct engaged in contrary to this Code that may also be unlawful under Federal and State legislation. Stakeholders that engage in conduct contrary to this Code may jeopardise their involvement with PetSure.

4.4 What to do if you are concerned about a breach of the Code?

If you do notice something that is in contravention of this Code or a PetSure Policy, you must escalate the incident to your people leader and/or Human Resources. Alternatively, PetSure has engaged an external specialist organisation to receive any concerns raised under PetSure's Whistleblower Policy confidentially.

This is so that people raising concerns can feel comfortable and assured that the issues will be dealt with confidentially, professionally and in good faith. Where the person raising concerns is not satisfied with the outcome of the investigation, they can request that the matter be escalated to PetSure's Disclosure Officer.

4.5 Protection for people who raise concerns about a breach of the Code

PetSure is committed to protecting any person who raises concerns about a breach of the Code from retaliation or reprisals.

Any attempt to take detrimental action against a person who raises a legitimate breach of the Code will be treated seriously and may lead to disciplinary action.

This Code may be changed, replaced or removed from time to time at the discretion of PetSure. Our people are required to comply with this Code, but it does not impose any contractual obligations on PetSure or provide the basis for any legal claims against it.

Any policies listed within this Code are not an exhaustive list of PetSure's key policies. You are responsible for familiarising yourself with all related policies and procedures that apply to your role.

This Code should be read in conjunction with other relevant policies, including (but not limited to):

- Bullying & Equal Employment Opportunity Policy
- Grievance Policy
- Whistleblower Policy
- Confidentiality and Non-Disclosure Group Policy
- Conflict of Interest Policy
- Expenses Policy
- Information Security Policy
- Fraud Policy
- Acceptance of Gifts/Benefits Policy
- Media Relations and Social Media Policy

PetSure is committed to protecting any person who raises concerns about a breach of the Code.

