

# Integrity Trust Expertise The Fiducian Way



## Code of Conduct

Fiducian Group Limited  
Level 4, 1 York Street, Sydney

August 2025

## Control Sheet

|                           |   |
|---------------------------|---|
| <b>Policy</b>             | Code of Conduct                         |
| <b>Version</b>            | 11.0                                    |
| <b>Entity</b>             | Fiducian Group Limited                  |
| <b>Date Effective</b>     | 18 August 2025                          |
| <b>Approved By</b>        | The Board of the Fiducian Group Limited |
| <b>Review Requirement</b> | Annually                                |

| <b>Modifications</b> |                             |  |                    |
|----------------------|-----------------------------|--|--------------------|
| <b>Version</b>       | <b>Date of Modification</b> | <b>Brief Description of Modification</b>       | <b>Approved By</b> |
| 1.0                  | 16 September 2015           | Review and update of FPSL Policy               | FGL Board          |
| 2.0                  | 21 November 2016            | Minor update to policy following annual review | FGL Board          |
| 3.0                  | 17 August 2017              | Annual review – no modification                | FGL Board          |
| 4.0                  | 16 August 2018              | Annual review – no modification                | FGL Board          |
| 5.0                  | 15 August 2019              | Annual review – minor amendments               | FGL Board          |
| 6.0                  | 17 August 2020              | Annual review – minor amendments               | FGL Board          |
| 7.0                  | 16 August 2021              | Annual review – no modification                | FGL Board          |
| 8.0                  | 15 August 2022              | Annual review – no modification                | FGL Board          |
| 9.0                  | 14 August 2023              | Annual review – minor amendment                | FGL Board          |
| 10.0                 | 15 August 2024              | Annual review – no modification                | FGL Board          |
| 11.0                 | 18 August 2025              | Annual review – no modification                | FGL Board          |

# **Code of Conduct**

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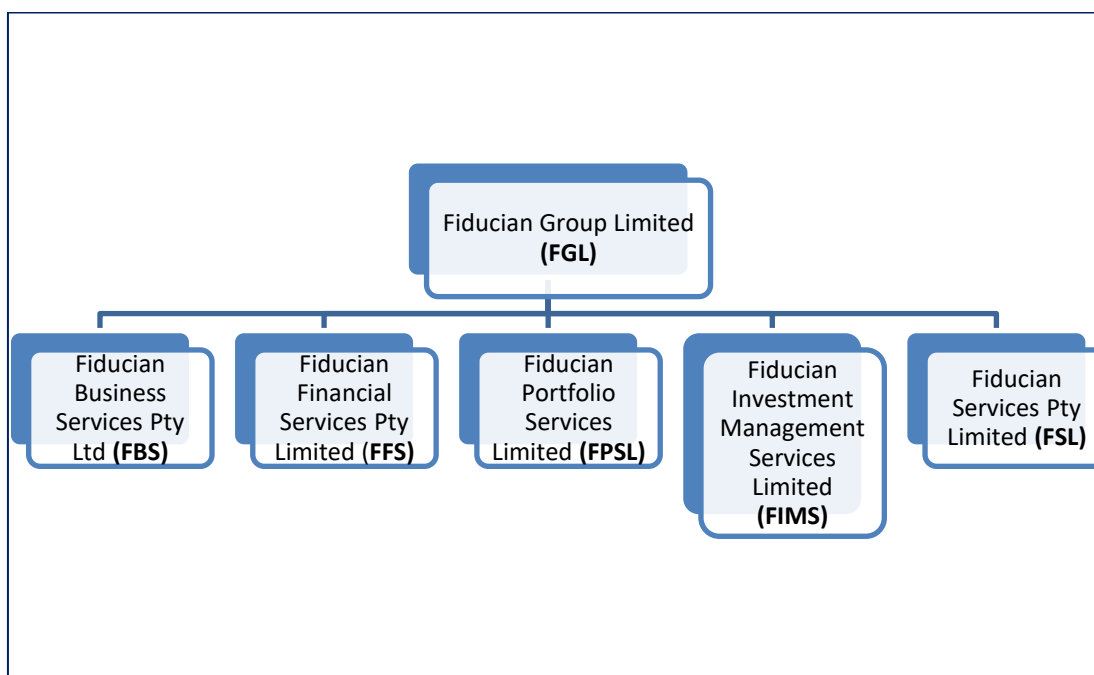
# 1. INTRODUCTION

## 1.1 Organisational context

1.1.1 Fiducian Group Limited (ABN 41 602 423 610) has the following wholly owned subsidiaries (collectively known as the Fiducian Group or **Fiducian**):

- (a) Fiducian Portfolio Services Limited ABN 13 073 845 931 – trustee for registered superannuation entity of Fiducian Superannuation Service and its sub-funds, regulated by the Australian Prudential Regulatory Authority.
- (b) Fiducian Financial Services Pty Ltd (**FFS**) ABN 46 094 765 134 (AFSL No. 231103) – provider of financial planning services through its network of franchisees and employed financial advisers;
- (c) Fiducian Investment Management Services Limited ABN 28 602 441 814 (AFSL No. 468211) – provider of funds management and operator of investment services (including wrap platforms (Fiducian Investment Service) and also responsible entity of a suite of registered managed investment schemes known as the Fiducian Funds and the Fiducian SMA Fund;
- (d) Fiducian Business Services Pty Ltd ABN 16 063 433 367 – provider of business development and distribution services to related companies of the Fiducian Group; and
- (e) Fiducian Services Pty Limited ABN 41 602 437 892 – provider of information technology solutions and administration services to administer superannuation and investment service platforms used by FFS financial planners and independent financial advisers. FSL also provides administrative services for the Fiducian Group such as platform administration, legal, finance, human resources, marketing, risk & compliance and information technology.

1.1.2 The Fiducian Group is a specialist financial services organisation providing financial planning, funds management, investment platform administration, information technology and business development/distribution services.



## 1.2 Overview

- 1.2.1 To ensure all personnel of Fiducian are aware of their obligations under the *Corporations Act 2001* (Cth), and also Fiducian's expectations in the areas of corporate and personal conduct.
- 1.2.2 Fiducian believes the policies developed by it are beneficial for the entire Fiducian Group, and believes all Fiducian personnel should act at all times with the utmost integrity, objectivity, and in compliance with the letter and spirit of the law. Personnel include all officers, employees, contractors, franchisees and associates (**Personnel**).

## 2. THE CODE OF CONDUCT

### 2.1 Commitment to the Code of Conduct

- 2.1.1 The Board, Management and Personnel of Fiducian are committed to implementing Fiducian's core principles and values stated in this Code of Conduct when dealing with customers, clients, employees, regulators, creditors and the community as a whole.
- 2.1.2 Fiducian is dedicated to delivering outstanding performance for investors, customers and Personnel. Fiducian aspires to continue its success while operating openly with honesty, integrity and responsibility and maintaining a strong sense of corporate social responsibility.
- 2.1.3 To maintain its corporate social responsibility Fiducian will conduct its business ethically and according to its values, encouraging community initiatives, considering the environment and ensuring a safe, equal and supportive workplace.

### 2.2 Responsibility to shareholders

- 2.2.1 Fiducian is committed to delivering value to its shareholders and to representing Fiducian's growth and progress truthfully and accurately. Fiducian also complies with the laws and regulations that govern shareholders' rights.
- 2.2.2 Fiducian is committed to safeguarding the integrity of financial reporting and as such openly promotes and establishes a structure of review and authorisation designed to ensure the truthful and factual presentation of Fiducian's financial position.
- 2.2.3 Fiducian will prepare and maintain its accounts fairly and accurately in accordance with the accounting and financial reporting standards in Australia or other countries in which it conducts business.
- 2.2.4 Fiducian fosters open and frank discussions with its auditors to assist them in being satisfied that all relevant matters are fairly disclosed.

### 2.3 Employment Practices

- 2.3.1 Fiducian will:
  - (a) provide a safe workplace that complies with workplace health and safety laws;
  - (b) promote equal opportunity for all Personnel at all levels irrespective of colour, race, gender, age, ethnicity or religious beliefs;
  - (c) provide equal opportunity to all qualified individuals in recruitment, compensation, promotion, training and other employment practices;

- (d) promote the treatment of all Personnel with respect and with no bullying, harassment or discrimination;
- (e) encourage employee share ownership, but will establish and enforce policies regarding trading in those securities where Personnel have inside information;
- (f) train and support Personnel pursuing further education outside of the Group;
- (g) ensure all personnel abide by the rules of the Compliance Plans for each Fund, Fiducian's Compliance Framework and Risk Management Framework as relevant to their roles;
- (h) recognise the need, from time to time, to give or accept customary business courtesies in accordance with ethical business practices, however, Personnel will not solicit such courtesies and will not accept gifts, services, benefits or hospitality that might influence, or appear to influence, Personnel conduct in representing Fiducian;
- (i) not tolerate the offering or acceptance of bribes, inducements or unauthorised commissions by any of its Personnel or officers;
- (j) not tolerate the misuse of Fiducian assets or resources and Personnel will not use such assets or resources for their own benefit;
- (k) seek to avoid conflicts of interest so that Personnel interests, or the interests of family members of Personnel, do not affect the way he or she handles Fiducian's business;
- (l) not tolerate Personnel being under the influence of illegal drugs or alcohol on or off Fiducian's premises while at work; and
- (m) unless otherwise agreed in writing with Personnel, expect that Personnel will work exclusively for Fiducian.

## **2.4 Obligations relative to Fair Trading and Dealing**

2.4.1 Fiducian is committed to conducting its business in accordance with the spirit and letter of all applicable competition, consumer and environmental laws and regulations. To this end Fiducian encourages all Personnel to have regard for their clients and the environment when carrying out their duties.

## **2.5 Privacy**

2.5.1 Fiducian abides by the Australian Privacy Principles.

## **2.6 Confidential Information**

2.6.1 All Personnel must maintain the confidentiality of business information and protect it. This obligation of confidentiality applies while as Personnel as well as after ceasing to be Personnel of Fiducian. Information that must be kept confidential includes internal, confidential or proprietary information related to Fiducian's business, technological and other knowledge, process, software, product formulation, business strategies and plans, and information concerning Fiducian's operations, clients, vendors, suppliers and employees.

## **2.7 Conflict of Interest**

2.7.1 Where an individual's private interests are at variance in any way with the interests of Fiducian as a whole a conflict of interest exists. Personnel and directors must avoid conflicts between their own interests and the interests of Fiducian. Where Personnel or a director is concerned that there may be a conflict of interest it should be discussed with the Company Secretary as soon as possible.

## **2.8 Group Policies**

- 2.8.1 Fiducian creates, reviews, updates and publishes its Policies and Guidelines on a regular basis. All Personnel are to adhere to those Policies and Guidelines as amended from time-to-time.

## **3. APPLICATION OF THE CODE OF CONDUCT**

### **3.1 Reporting of non-compliance**

- 3.1.1 It is expected that Personnel will be able to resolve most concerns or queries relating to the application of this Code of Conduct by discussing the matter with their colleagues. If this discussion does not achieve the desired outcome or a person is not comfortable in speaking with the relevant person(s), a person may report their concerns to:
- (a) their Manager or another senior member of their Business Unit;
  - (b) a member of Legal and Compliance;
  - (c) the Manager of another Unit; or
  - (d) the Executive Chairman.
- 3.1.2 Personnel may also utilise the provisions of the Whistleblower Policy to report any concerns in relation to an alleged non-compliance with this Code of Conduct.
- 3.1.3 Once reported, an investigation will be made in accordance with the relevant group policy to identify whether non-compliance has occurred.

### **3.2 Consequence of non-compliance**

- 3.2.1 If the investigations identify a breach in this Code of Conduct or breaches of policy, appropriate disciplinary and remedial action will be taken. This will range from providing the employee with training, coaching and counselling through formal warnings to termination of their employment.

### **3.3 Review of the Code of Conduct**

- 3.3.1 Fiducian will review this Code of Conduct at least on an annual basis.