

ASA Code of Conduct

Document Control

Policy owner: Board

Responsible Committee: People and Culture Committee

Approved by: Board

Effective from: XX May 2026

Review due: XX May 2028

Applies to: Directors, employees, volunteers and contractors acting on behalf of ASA, and members where relevant to their participation in ASA activities or other engagement with ASA

Related documents: Whistleblower Policy; Bullying, Harassment, Discrimination and Victimisation Policy; Sexual Harassment, Sex Discrimination and Sex-Based Harassment Policy; Work Health and Safety Policy; Diversity and Inclusion Policy

Version: 3.0

1. Purpose

This Code reflects who we are and what is important to us.

It sets out our shared values and establishes a framework for decision-making, conduct and accountability across the Australian Shareholders' Association.

Compliance with this Code is a condition of appointment, employment, participation in ASA activities, or other engagement with ASA.

2. Scope

This Code applies to all ASA directors, employees, volunteers and contractors acting on behalf of ASA, and to members where relevant to their participation in ASA activities or other engagement with ASA.

All persons covered by this Code are expected to comply with it.

This Code does not form part of any contract of employment or other engagement and does not give rise to any contractual entitlement.

3. Standards of conduct

All persons covered by this Code are expected to uphold ASA's values through their conduct and to comply with the following standards:

- (a). act honestly, respectfully and in good faith
- (b). act with care, diligence and integrity in performing their role

- (c). comply with applicable laws, ASA policies and lawful directions relevant to their role
- (d). treat others with courtesy, fairness and respect, and contribute to a safe, inclusive and respectful environment
- (e). refrain from bullying, harassment, sexual harassment, unlawful discrimination, victimisation and other inappropriate conduct
- (f). identify, disclose and appropriately manage actual, potential or perceived conflicts of interest
- (g). protect confidential information and use ASA information, resources and authority properly and responsibly
- (h). make it clear, when speaking in a private capacity, that their views are their own and not those of ASA
- (i). not engage in conduct connected with ASA activities that is likely to seriously damage ASA's reputation or relationships
- (j). comply with both the spirit and the letter of this Code.

Directors and officers are also expected to meet the governance and fiduciary obligations attaching to their role, including exercising independent judgement, using powers for a proper purpose, and acting in the best interests of ASA.

4. Breaches of the Code

A breach of this Code is a serious matter and may be investigated by ASA.

Where a breach is substantiated, ASA may take action having regard to the person's role and the seriousness of the conduct. Such action may include counselling, training, restriction of duties, suspension from activities, termination of employment or engagement, removal from a volunteer or other role, referral to the Board, or any other action available under ASA's Constitution, policies or applicable law.

5. Reporting concerns

Concerns about possible breaches of this Code should be raised as early as possible.

Complaints or concerns under this Code should be reported to the CEO, the Chair, or the Chair of the People and Culture Committee.

A complaint may be raised with whichever of those persons is most appropriate in the circumstances. If the complaint concerns the CEO, the Chair, or the Chair of the People and Culture Committee, it should be raised with one of the others who is not involved in the matter.

Protected disclosures and serious misconduct must be reported and managed in accordance with ASA's Whistleblower Policy. Concerns involving bullying,

harassment, sexual harassment, discrimination, victimisation, or work health and safety issues may also be addressed under ASA's related policies and procedures.

ASA will treat reports as confidentially as is reasonably practicable and will not tolerate victimisation or retaliation against a person who raises a genuine concern in good faith.

Nothing in this Code prevents a person from making a protected disclosure, reporting misconduct, raising a complaint or inquiry in relation to employment, exercising a workplace right, or complying with any legal or regulatory obligation.

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