

CODE OF CONDUCT

Credit Clear Limited (Company)

ACN 604 797 033

1. INTRODUCTION

The Company is committed to the highest level of integrity and ethical standards in all business practices. Our directors, employees and contractors are representatives of the Company and must conduct themselves in a manner consistent with current community and Company standards and in compliance with all relevant legislation.

The Company expects its representatives to behave and conduct business in the workplace in a manner consistent with our core values:

- Integrity: “We do what we say we will do”, which means:
 - Customers can depend on us
 - Our staff follow through on agreements and promises to their colleagues
 - Suppliers and partners can depend on us when we are doing business together
- Progression: “We keep you moving forward”, which means:
 - We continuously strive to improve the customer experience and performance of our business
 - Our workplace provides opportunities for personal and professional growth for our employees
- Engagement: “We listen and collaborate”, which means:
 - We believe we can build a better Company when we work as a team
 - Our staff are active and proud members of our business
 - We are open to different views and new ideas to solve our greatest challenges
 - We continuously strive get better at what we do

2. WHO THE CODE APPLIES TO

All directors, officers, employees and contractors of the Company are expected to uphold our core values and comply with the spirit of the Code of Conduct when conducting business activities.

3. YOUR OBLIGATIONS

All directors, employees and contractors must:

- Be familiar with and comply with all Company policies and procedures;
- Be aware of, and comply with, all laws and regulations relating to their work;

- Perform their duties in a professional manner;
- Act with integrity and objectivity and strive to enhance the Company's reputation and performance;
- Be aware of and avoid any actual or perceived conflicts of interest;
- Ensure that any property and assets owned or leased by the Company that are under their control are protected from loss, theft and unauthorised use and remain fit for the purpose for which they were acquired;
- Respect and protect the privacy of others and not discuss or disclose confidential information without the Company's permission;
- Not take advantage of the property or information of the Company or its customers for personal gain or to cause detriment to the Company or its customers;
- Not take advantage of their position or the opportunities arising therefrom for personal gain;
- Protect the integrity of the information, reports and records under their control and exercise the highest standard of care in preparing materials for public communications;
- Uphold the Company's commitment to pursue good corporate citizenship while engaging in its corporate activities;
- Treat fellow staff members with respect and not engage in bullying, harassment or discrimination;
- Act in a manner which is consistent with and upholds the Company's values; and
- Seek guidance and undertake training when they are unsure about their obligations.

4. WHAT TO DO IF YOU SUSPECT THE CODE HAS BEEN BREACHED

(a) Reporting channels

You are encouraged to report to your supervisor or manager any genuine behaviour or situation which you believe breaches or potentially breaches the Code of Conduct, Company policies or the law.

Alternatively, you can report unacceptable behaviour to the General Counsel and Company Secretary.

If you wish to report a breach or potential breach anonymously, you may provide a detailed report to the General Counsel and Company Secretary:

- By email to mike@creditclear.com.au; or
- By post to the Company's address published on the Contact page of the Company's website.

The Company is committed to ensuring that you are not disadvantaged or discriminated against for reporting unacceptable behaviour in good faith.

(b) Investigations

Preliminary investigations of reported breaches are administered by a delegate of the Managing Director and/or the General Counsel and Company Secretary.

If a breach of the Code of Conduct is found to have occurred, a formal investigation process is administered by the General Counsel and Company Secretary in consultation with the supervisor or manager of the offending person. In the investigation process, all employees are expected to cooperate with the directions of the General Counsel and Company Secretary.

5. CONSEQUENCES OF BREACHING THE CODE

The Company expects that any breach of the Code of Conduct will be inadvertent and without intent, however it should be clearly understood that any breach may result in disciplinary action or other penalties including, in extreme circumstances, dismissal or termination of the contract or engagement. The Company will act objectively and in accordance with any applicable provisions or requirements in an employment contract.

The Company reserves the right to inform the appropriate authorities where it is considered that there has been criminal activity or an apparent breach of the law.

6. WHO TO SPEAK TO IF YOU HAVE QUESTIONS

The Code of Conduct does not include every ethical issue that an employee might face; nor every law and policy that applies to the Company.

In representing the Company you are expected to act in a manner consistent with the key values underpinning the Code, namely:

- our dealings with employees, customers, suppliers and other stakeholders must be governed by the highest standards of honesty, integrity and fairness;
- our decisions must be made in accordance with the spirit and letter of applicable law; and
- our business must be conducted honestly and ethically, with our best skills and judgment, and for the benefit of customers, employees, shareholders and the Company alike.

If you have any questions regarding the Code of Conduct or any of the Company's policies at any time, you should contact the General Counsel and Company Secretary.

7. REVIEW

This Code will be reviewed regularly by the Board, having regard to the changing circumstances of the Company.

The Board may change this Policy from time to time by resolution.

This Policy will be made available on the Company's website.

Policy history

Approved by the Board on 19 August 2020.