



# Our Code of Conduct



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Cover art  
"Country roads in bloom" by Alison White

# A message from Rohan

Our Code of Conduct is one of the many ways we put our Playbook into practice. The trust our people place in us, and our high standards of ethical behaviour are fundamental to the way we do things around here.

No matter what role you play, we're all in it together. We rely on each other to understand and uphold professional behaviours and standards, and apply them consistently. It is this common thread that unites us and makes us who we are. We will help each other to build the skills to do the right thing.

We all have a personal responsibility to incorporate the principles of this Code of Conduct into our work. Our competitive advantage is our people and the experience they deliver. After all, we're here to connect people. I look forward to working with each of you to maintain our special culture.



**Rohan Lund**  
Group CEO



# Why it's important

Our Code of Conduct is the compass for our standards of behaviour while at work, and when representing our businesses and brands. The Code underpins our ability to behave in a manner consistent with our Playbook. This includes wherever we're performing work – whether it's on the side of the road, on a ferry, visiting a Member or supplier, and any time we're representing the NRMA brand or can be identified as part of the NRMA, including activities outside normal working hours.

We are all responsible for adhering to the Code, and the Code of Conduct applies to everyone working across the NRMA Group including employees, directors, joint venture partners, consultants, agents, contractors, subcontractors, franchisees and suppliers. It provides a framework, but can't describe every situation, law or policy that may apply to you. We all need to exercise good judgment, own our actions and ensure that we behave in alignment with our Playbook and culture. If in doubt, talk to your people leader or HR Business Partner.

**"All the little pieces"**

Playbook cover art by Amy Scott



# Our common thread

The NRMA Group today is made up of businesses that are as unique and different as the people who work in them. But there is something that links us together, a common thread that runs through us. That makes us, uniquely us.



## We will walk in your shoes

We show empathy. We understand that every person and experience is different. We will listen to how people feel and look at things from their perspective to guide the choices we make.



## We know your time is precious

We respect people. We know that everybody has a lot going on. We won't keep people waiting or waste their time so everybody can spend more time on what matters most.



## We always think one step ahead

We will always go the extra step to make things better. We will try to anticipate the needs of others, to solve their problems, and we'll do what's right, even when it's not easy.



## We will keep you safe along the way

We want everyone to always get home safely. We will fight for a safer way, and do everything we can to keep people safe and well, including ourselves.



## We will carry you when you need help

We understand life isn't always easy and sometimes people need a helping hand when times are tough. For us, this is what being a mutual is all about, together we can make a difference.

# Putting it into practice

## As employees, we all have a responsibility to:

- comply with our Code of Conduct;
- work in the spirit of our Playbook;
- act in the best interest of the NRMA;
- call things out when they don't seem right;
- raise any concerns or issues with your people leader or designated HR Business Partner.

## People leaders, managers and supervisors have a responsibility to:

- communicate our Code of Conduct to everyone;
- lead by example, showcasing the spirit of our Playbook and Code;
- take action when you're aware of behaviours that don't align with our Code of Conduct or policies.

## To put our Code of Conduct into practice, we ask three things of you:

- **Read it.** Make sure you understand it. If there's anything you don't understand, it is your responsibility to ask;
- **Agree to it.** Once you've read it through, we'll ask you to confirm that you understand and agree to abide by the standards of behaviour and responsibilities outlined;
- **Follow it.** It's your responsibility to always follow the standards and behaviour that are asked of you as set out in the Code.

# Our Code of Conduct

## We comply with laws and regulations

There are a number of compliance requirements that apply to our day to day activities at work, the products we sell, the services we provide and the investment activities we're involved in. Meeting these requirements are a part of how we operate to keep us safe along the way. We will comply with all applicable laws, regulations and operating licences, as well as our Playbook, our Code, and our policies and procedures wherever we operate.

### We are all responsible for ensuring that we:

- are aware of and comply with all laws, regulations and operating licences that apply to our role and work;
- carry out our duties to the best of our ability, in good faith and always complying with the policies and procedures of the NRMA;
- do not engage in behaviour, or ignore behaviour by others that breach compliance requirements;
- complete all training relevant to your role and raise anything you don't understand with your people leader or designated HR Business Partner;
- promptly raise concerns or suspected breaches with your people leader and support their resolution;
- abide by the law including the spirit and intention of the law;
- be guided in our work by our Playbook and by this Code of Conduct.

## We do the right thing

Acting ethically, with integrity and fairness is at the core of what we stand for. We always act with honesty and integrity, so we have zero tolerance for any form of fraud, bribery or corruption – directly or indirectly. And we expect third parties acting on our behalf to do the same.



We make sure our personal, business, financial and other interests don't conflict with, or have the potential to conflict with our work duties or the best interests of the NRMA.

**By complying with our Conflicts of Interest Policy and our Procurement Policy, we agree to:**

- act in the best interest of the NRMA at all times;
- disclose any actual, potential or perceived conflict of interest;
- avoid any dealings or relationships that may create a conflict with our obligations to the NRMA;
- excuse ourselves from any decision making that may be, or perceived by others to be, a conflict of interest;
- don't take advantage of our positions or the opportunities arising from them, including the use of information from the NRMA for personal gain or by passing information to others;
- aren't directly involved in the potential employment or employment of a relative, close friend or associate;
- make sure we know, understand and act within our delegated authority and Financial Delegation of Authority Policy.

At the NRMA we're committed to upholding fair and ethical securities trading practices and complying with all applicable laws. We must not use any information about the NRMA, a competitor, joint venture, Member, customer or supplier for financial benefit, personal benefit or present the information to others before it becomes public.

**We:**

- understand and comply with the Insider and Securities Trading Procedure;
- understand that these obligations are particularly important, given our Members and community expect us to operate to the highest ethical standards.

At the NRMA, we seek to make positive and sustainable economic, social and environmental contributions wherever we operate. We're fully committed to operating responsibly and establishing and adhering to the highest ethical standards across our group. We work across our operations with the aim of

ensuring that we and our business partners operate without infringing on human rights. We have zero tolerance for the use of child labour or any forms of slavery or human trafficking in our business. We're committed to building strong relationships and working collaboratively with the communities in which our Members live and in which we work.

We have a shared responsibility for the protection of the environment and aim to drive sustainable outcomes in all of our operations. And we always strive to minimise our environmental footprint through sustainable management and use of our resources.

**By complying with our Group Safety, Wellbeing and Environment Policy, we:**

- work in a way that respects the human rights of all people that are touched by our operations;
- respect the local culture, beliefs and interests of the communities in which we work;
- take proactive steps to minimise, and to identify opportunities to minimise, environmental impacts associated with our work;
- act in a way that is socially responsible.

As a matter of principle, we don't receive gifts and gratuities. However, we understand that small tokens of goodwill may be exchanged, and that from time to time you may be invited to attend an event because of your job. We need to make sure we comply with our Gifts Policy and exercise caution when offering or accepting gifts and/or hospitality to ensure it isn't perceived as improperly influencing a business outcome. Being a part of the NRMA means we're ambassadors of our brand. We perform our jobs to the best of our ability, always striving to make a positive contribution in line with the standards that are expected of us, as set out in this Code and our Playbook.

## We're good to each other

Maintaining a safe and inclusive working environment, where we treat each other with dignity and respect is fundamental to us. We promote diversity and inclusion and we're respectful and fair in the way we work with our colleagues, Members, customers, partners, suppliers and communities in which we operate. We value the benefits that a diverse and inclusive workplace bring.

It helps us achieve our objectives, enhance our brand, attract and retain talented people and makes us an employer of choice.

We do not tolerate harassment, discrimination, bullying, vilification or victimisation. These unlawful behaviours are prohibited in our workplaces, in the delivery of our services and in our every interaction — and if we witness them, we call them out. We all have a role to play in maintaining safe and healthy workplaces and Member, customer and guest experiences.

**We comply with our Anti-Discrimination, Harassment and EEO Policy by:**

- living our Playbook;
- not engaging in any conduct that is unlawful or inconsistent with this policy;
- promptly completing training on the subject when directed;
- raising concerns or suspected breaches with your people leader and supporting their resolution;
- addressing and not ignoring behaviour that is inconsistent with this policy, whether that conduct is directed at us or someone else.

## We stay safe along the way

The safety and wellbeing of employees, contractors, Members, customers, suppliers and the wider community is of paramount importance to us and the work we do. We strive to create a culture where all employees are responsible for keeping themselves and others safe.

We have a duty of care to our people to provide a safe work place and our people have a duty to take reasonable care for the safety of themselves, their colleagues, members and customers. We work to create a safety culture where everyone is accountable to seek out and minimise risks that may cause injury or harm. We have a just culture in the way we respond to safety events, hazards and near misses.

**We're all responsible for understanding and complying with our safety obligations, and ensuring we:**

- perform our job safely and with regard to the safety of others;
- understand and follow all relevant safety policies, standards, procedures and processes;

- know that no task is so urgent and no service so important that we can't take the time to do it safely;
- comply with the Group Safety, Wellbeing and Environment Policy;
- understand that our actions and choices can have significant consequences for safety, so the NRMA requires all workers to comply with the Drug and Alcohol Standard;
- inform our people leader if we're taking medication that could affect our ability to perform work safely.

Our employee assistance program provides free, confidential and professional counselling. You can access it by calling 1800 808 374 (from anywhere in Australia).

## We protect our business and brand

We respect, secure, protect and care for the assets and resources of the NRMA and others, including company and personal information, and use them only for their intended purpose. Under privacy laws, we have a number of obligations concerning personal information we collect from individuals, including our Members and customers. And we place great importance on protecting this information.

We recognise that data security and privacy are a non-negotiable part of how we work and maintaining the trust that is integral to our brand. We keep information secure and protect the personal information of our Members, customers and fellow employees from unauthorised access and disclosure. We keep full and accurate records of our business activities as legally or contractually required. We don't tolerate misappropriation, falsification or improper alteration of records and we have the courage to speak up if we suspect or learn that records are missing, misleading or contain errors.

**We:**

- use company property for its intended purpose and not for personal gain;
- do not share any information about the NRMA, its Members, customers, employees or suppliers with any person who is not authorised to see it — both while working for the NRMA and after;

- don't do anything that compromises our Member and customer data or trust;
- comply with all steps to reduce the risk of unauthorised access to our facilities, information, data or other assets;
- understand and comply with the Company Property Policy, Data Governance Policy and Privacy Policy;
- promptly complete training on these matters when directed.

As a large and highly visible organisation, the way in which we conduct ourselves and the decisions we make can have a direct impact on our reputation.

**To protect our brand and reputation, we comply with our Social Media Policy and Media and External Communications Policy by:**

- upholding the integrity and strong reputation of the NRMA and not using public platforms (including social media) to the detriment of the NRMA or in any way that's damaging;
- acting and communicating responsibly, and in accordance with our policies and procedures in all of our online content and interactions whenever they can be attributable to the NRMA, your employment and work for the NRMA or have the potential to negatively impact on the NRMA;
- understanding that our policies and procedures apply to anonymous communications and online posts and that, at some point, an anonymous communication or online post may be linked to the identity of the author and their relationship with the NRMA;
- not making statements or providing information to media unless authorised under the Media and External Communications Policy;
- not making public comments about, or on behalf of, the NRMA;
- not posting inappropriate, false or malicious comments or materials online regarding the NRMA, our workplace or our colleagues.

Whenever we're associated with our brand, whether it's through a uniform, badge or business vehicle, it's important that we present ourselves as ambassadors of the NRMA. This means that we conduct ourselves professionally and in accordance with our Playbook, Code, and our policies and procedures. If your role doesn't require a uniform, we trust you to dress in a way that best represents you and the NRMA brand.

If your role does include a uniform, we trust you to represent our brand professionally and to be clean, tidy and well presented.

## We have the courage to speak up

We're all individually accountable for complying with the Code, and we have the courage to call things out when they don't seem right.

If you see or know of something that you believe doesn't meet the expectations set out in this Code, in our policies and procedures, or is potentially illegal, you have an obligation to report it. If the concern is in relation to treatment directed towards you, you can raise this in accordance with the Personal Grievance Policy. All other concerns should be raised with your people leader, their manager or the person concerned. If you're not comfortable doing this, you can escalate your concern to your Human Resources Business Partner.

If the concern is in relation to particularly serious or fraudulent behaviour, we support anyone raising or helping to address a breach through our Speak Up Policy. You can access our Speak Up Hotline by calling 1800 078 299 (from anywhere in Australia) and 0800 608 976 (from anywhere in New Zealand).

**A particularly serious concern may be in relation to:**

- fraudulent or corrupt behaviour or conduct;
- illegal or criminal activity (like theft, selling or using drugs, criminal damage to property or other intentional breaches of any law or regulation);
- unethical and fraudulent behaviour that may breach our policies (such as dishonestly altering company records or data, adopting questionable accounting practices);
- impeding internal or external audit processes;
- abuse of authority;
- any other conduct which may cause material financial or non-financial loss, brand damage, breach of confidentiality, or anything that's materially detrimental to the interests of the NRMA;
- taking or threatening to take detrimental action against anyone who makes a disclosure under the Speak Up Policy.

# What happens if the Code is breached?

Any allegation that our code has been breached will be investigated, handled discreetly and with sensitivity. We'll respond to breaches fairly and justly and take the time to understand the intent and actions of a breach, knowing there may be circumstances where we need to carry our employees when they need help.

Breaches of our Code could have negative outcomes for the NRMA and for each of us individually. We take these very seriously, and they may result in consequences ranging from disciplinary action, through to termination of employment or contract. Furthermore, if someone breaks the law, they may be personally liable.

We also have an obligation and responsibility to report a breach to the appropriate authorities, where it's considered that there's been possible criminal activity or an apparent breach of law.

**To access all of our Group policies, head to Blue and search "all policies".**

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