

Code of Conduct

THE WHY

This Code of Conduct outlines the standards of behaviour expected within our Zip Co Limited ACN 139 546 428 ('Company') and its subsidiaries (collectively 'Zip').

Maintaining the trust of those who count on us every day is essential. Continuing to embed strong proactive risk management and risk culture within our business is a critical component of our compliance culture. Our Code of Conduct provides a framework to operate within, both as individuals and as a business. Our Code of Conduct underpins how we deliver fair outcomes for our customers, business partners, shareholders and people. It is important that we all use our Code of Conduct and Values to guide the work we do. Our Code of Conduct asks that we each proactively consider, and raise issues of concern.

THE WHO

Importantly, our Code of Conduct applies to all of us – our people, including our Executive Leadership team and our Board members, without exception.

This Code of Conduct replaces the previously externally published:

- Code of Conduct for Directors and Executives (November 2023);
- Code of Conduct for all staff (July 2020).

RESPONSIBILITIES

Zip's Board is responsible for formally adopting the Code of Conduct, its periodic review, and disclosure of the Code of Conduct to its Directors and to Zip staff.

Zip's Group CEO, Executive Leadership, Managers and People & Culture Leaders are responsible for ensuring all our people receive appropriate training on their obligations under this Code of Conduct.

All our people are responsible for complying with this Code of Conduct both in detail and in spirit and are required to complete mandatory annual training.

All our people should apply the principles of the Code of Conduct in their behaviours and with respect to their relationships with each other, their manager and with all those with whom they deal with in their work for the Company (including Zip's business partners, suppliers and customers). The Code of Conduct is a guide for the expectations of behaviour and the way in which we operate as a Company.

THE WHAT

To comply with the Code of Conduct of Conduct, all people must:

- Actively promote the highest standards of ethics and integrity in carrying out their duties for the Company;
- Disclose any actual or perceived conflicts of interest of a direct or indirect nature of which they become aware, including those they believe could compromise in any way the reputation or performance of the Company;
- Respect the confidentiality of all information of a confidential nature which is acquired in the course of the Company's business and not disclose confidential information without specific authorisation or make improper use of such confidential information;
- Comply with all laws and regulations that apply to the Company and its operations; in all countries and states within which the Company operates and notify the Compliance team immediately of any suspected potential breach of the law;
- Deal with the Company's customers, business partners, suppliers, government officials and each other with the highest level of honesty, fairness and integrity and to observe the rule and spirit of the legal and regulatory environment in which the Company operates;
- Protect the assets and information of the Company to ensure availability for legitimate business purposes and ensure that they do not take advantage of their position with the Company for personal gain or to compete with the Company;
- Maintain a safe and fair work environment, treat fellow staff members with respect and not engage in bullying, harassment or discrimination;
- Comply with all of the Company's policies, such as the Anti-Bribery and Corruption Policy, Human Rights Statement and the Continuous Disclosure Policy. All available on the Zip website [here](#).

It is expected that all our people uphold our Company values

- Customer First
- Own It
- Stronger Together
- Change the Game

RAISING CONCERNS AND CONSEQUENCES OF NON-COMPLIANCE

- Directors, Executives and Employees are encouraged and required to report any known or suspected concern of non compliance with this Code of Conduct to (i) the Compliance team; and/or People and Culture team, (ii) the Chair of the Audit and Risk Committee, or the Whistleblower Investigations Officer who will deal with concerns in accordance with Zip’s Whistleblower Policy.
- Any material breaches of this Code of Conduct will be reported to the Audit and Risk Committee.

Note, nothing in this policy prevents our people from pursuing legal remedies or resolutions through appropriate local, state or federal regulatory bodies or agencies or through the Courts.

Further Information

Please contact the ANZ or US People and Culture team for further information.

Version Control

Document Title	Code of Conduct
Use	External & Internal use
Policy and Procedure Owner	This Policy is owned by the Zip Compliance and People and Culture teams who have final authority to change or make amendments to this document.
Senior Manager Function (SMF) Accountability	Senior Director, People, Culture & Talent, ANZ Vice President, People & Culture, Americas Director, Compliance, ANZ Head of Compliance, US

Policy and Procedure Contacts	Senior Director, People, Culture & Talent, ANZ Vice President, People & Culture, Americas Director, Compliance, ANZ Head of Compliance, US
Document Author	Senior Director, People, Culture & Talent, ANZ Vice President, People & Culture, Americas Director, Compliance, ANZ Head of Compliance, US
Version	2024 Version
Original Issue Date	July 2020
Last Review Date	June 2024
Next Review Date	June 2026