



ETHICAL MANAGED FUNDS

Hunter Hall Group Code of Conduct

All employees of Hunter Hall (the 'Company') are expected to observe the highest standards of ethics, integrity and behaviour during the course of their employment with Hunter Hall.

The standards expected of employees include:

- compliance with all company policies, procedures and contracts,
- compliance with all reasonable and legal instructions of management,
- to be honest and fair in dealings with clients, colleagues, company management and the general public.

Specifically, employees are expected to:

- act with integrity in the performance of their duties,
- maintain client confidentiality,
- exercise proper courtesy, consideration and sensitivity in their dealings with clients and colleagues,
- comply with the provisions of relevant legislation and ethical requirements of their profession,
- respect the Company's ownership of all Company funds, equipment, supplies, records and property,
- maintain the confidentiality of any information acquired during the course of employment with the Company and after the termination of employment,
- not make any unauthorised statements to the media about the Company's business,
- refrain from sexual or other unlawful harassment in the workplace,
- observe Occupational Health and Safety rules, and
- not bring drugs into the workplace.

Breaches of the Code of Conduct will be dealt with in accordance with the Company's Termination Policy.