

Issued by Human Resources

Date July 2025

1. APPLICATION

The Code of Conduct (the **Code**) applies to all Export Finance Australia (EFA) Board members and employees including the Executive.

EFA may also require contractors engaged to work as part of EFA's operations to comply with the Code.

2. OBJECTIVES

The Code outlines the obligations and responsibilities of persons working at EFA.

The current Code is published on our Intranet site, OneX and external website.

3. CODE OF CONDUCT

Persons acting in connection with their employment or engagement with EFA must:

1. be impartial and objective;
2. consider matters on their merits;
3. act with care and diligence, cooperating with others to achieve EFA's objectives and effectively manage risk;
4. act with honesty and integrity, and in good faith;
5. treat everyone with courtesy and respect, without coercion or harassment of any kind;
6. comply with any lawful and reasonable direction given by someone with authority to give the direction;
7. use EFA resources in accordance with applicable policies;
8. not participate in corrupt practices, bribery of foreign officials or otherwise improperly use their position, or information obtained in their position, to;
 - (a) gain, or seek to gain, a benefit or advantage for themselves or another person; or
 - (b) cause, or seek to cause, detriment to EFA, the Commonwealth or another person;
9. take reasonable steps to avoid personal interests which may conflict with EFA's interests and, where a conflict is identified, appropriately disclose and manage such conflicts;
10. comply with all applicable Australian laws; and
11. comply with EFA's applicable policies, procedures and guidelines as amended from time to time.

The Code is not intended to summarise, replicate or derogate in any way from other legislative obligations which may otherwise apply to Board members or employees, including obligations under the *Public Governance, Performance and Accountability Act 2013* (Cth) or the *Export Finance and Insurance Corporation Act 1991* (Cth).

4. REPORTING

A suspected breach of the Code by an employee may be reported to an employee's People Leader or Human Resources.

A suspected breach of the Code by a Board member may be reported to the Chairperson of the Board or, if the matter involves the Chairperson, the General Counsel of EFA.

5. MANAGING SUSPECTED BREACHES OF THE CODE OF CONDUCT

A suspected breach of the Code will be managed with as much expedition as a proper consideration of the matter dictates.

Whether a matter is to be dealt with formally or informally will depend on the circumstances of the matter, including the nature and seriousness of the allegation(s) made and the scope of the issue(s) raised.

Formal management may involve an internal or external investigation of allegations as a suspected breach of either this Code or, where appropriate, another EFA policy, procedure or guideline.

Informal management may involve counselling or workplace mediation.

6. PROCEDURAL FAIRNESS

A finding that a person has breached the Code will require that the person has been notified of the details of the suspected breach and provided with an opportunity to respond.

7. SANCTION

A breach of the Code may result in a sanction including disciplinary action, including termination of employment or engagement.