



## **Corporate Principles of Conduct**

### **1. Introduction from Chairman**

Our aim is to provide shareholders with attractive investment returns through access to a growing stream of fully franked dividends and growth in capital invested.

In this regard, the Company's goals are:

- to pay dividends which, over time, will grow faster than the rate of inflation; and
- to provide attractive total returns over the medium to long term.

Trust is of the highest importance to the Company. This is reflected in our Purpose:

"As trusted stewards of our shareholders' interests our purpose is to deliver attractive investment returns from the Australian and New Zealand equity markets, with less volatility and at a very low cost".

To deliver on this Purpose the Company and KMP are guided by the following qualities:

- Professionalism, Passion and Experience
- Integrity
- Respect
- Collaboration

These Principles outline ethical standards to be followed by all of us when carrying out our responsibilities with a view to the Company achieving its aims. More details on how the Company operates can be found in the Company's Corporate Governance Statement.

Craig Drummond  
Chairman

### **2. Scope and Application**

These Principles of Conduct (Principles) apply to Key Management Personnel (KMP), being Non-Executive Directors and Senior Executives of the Company whenever they are acting in their capacity as KMP of the Company.

The Company has entered into an agreement with Australian Investment Company Services Limited (AICS) to provide a comprehensive range of management, finance, marketing/business development and securities/stock market services to the Company. AICS is 75 per cent owned by the Company.

AICS has committed to maintain robust Principles of Conduct covering the entirety of its operations that are applicable to all employees of AICS, including those that have been appointed as Senior Executives of the Company.

### **4. Compliance**

KMP, as officers of the Company, are subject to extensive legal and regulatory responsibilities. KMP are expected to comply with the letter and spirit of all relevant laws and regulations applicable to them.

### **5. Conflicts of Interest**

Wherever possible, KMP should avoid conflicts of interest or else must disclose and manage them appropriately.



KMP must disclose to the Board (via the Company Secretary) any material personal interest that they or any closely related party may have in a matter that relates to the affairs of the Company. Where such a conflict of interest arises, appropriate arrangements will be followed so that interested persons are not included in making the relevant decisions.

Any additional office to be held by a Director should be discussed with the Chairman in advance and any change in offices should be disclosed to the Board (via the Company Secretary).

**6. No Misuse of Position or Information**

KMP must not improperly use their position or use information acquired from their position to gain advantage for themselves or for someone else or to cause detriment to the Company.

**7. Confidentiality**

KMP must not disclose any confidential information relating to the Company to any other person without proper authorisation from the Board unless the disclosure is required by law, other regulatory obligations, to meet contractual commitments or is otherwise required in connection with the Company's business or authorised under any Company policy.

**8. Privacy and Personal Information**

KMP must deal with all personal information in accordance with the Company's Privacy Policy and in compliance with applicable laws.

**9. Gifts / Entertainment**

The Company's operations are such that provision of gifts or entertainment to third parties takes place only on a limited basis and must always be of an appropriate size and nature.

The Company's policy is that KMP should not accept gifts or entertainment in their capacity as a KMP of an inappropriate size or nature. In any doubt, they should consult the Chairman, Managing Director or Company Secretary. In accepting gifts or entertainment, there must be no actual or perceived conflict of interest or ability to influence decision making.

**10. Reporting, Compliance & Review**

Compliance with these Principles of Conduct is a condition of employment with AICS for each Senior Executive of the Company and a condition of their appointment as a Senior Executive of the Company. Breaches of these Principles may result in disciplinary action being taken by AICS against the Senior Executive.

KMP may be asked to certify annually that they have complied with these Principles.

Suspected breaches of these Principles should be reported to the Managing Director or Chairman or via the Company's Whistleblower Protection policy which is found on the Company's website [www.afi.com.au](http://www.afi.com.au).

The Company Secretary will be responsible for the administration of these Principles, including providing any necessary or requested training to KMP, reviewing them and answering any questions on their application.

These Principles should be read in conjunction with other Company policies, including, but not limited to the Continuous Disclosure policy, Securities Dealing policy, Whistleblower Protection policy, Anti-Bribery and Anti-Corruption policy and Privacy policy.

Last updated: October 2023