

Metropolis Research Code of Conduct

ABN 39 083 090 993

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Policy approved by: Dale Hubner, Managing Director, Metropolis Research

Introduction

Metropolis Research is committed to being honest, behaving with integrity, and avoiding real or apparent conflicts of interest. These commitments apply equally to the company and every one of its employees. In order to uphold these commitments, Metropolis Research employees, including directors, are required to abide by the following Code of Conduct.

Code of Conduct

At all times, Metropolis Research employees must:

- Act honestly, in good faith, and in the best interest of Metropolis Research;
- Carry out their roles and responsibilities with skill, honesty, care, and due diligence;
- Not disclose confidential information that belongs to Metropolis Research, its clients, or associated third parties, and they must take reasonable steps to prevent its disclosure, unless that disclosure has been authorised by the Managing Director, the person from whom the information was provided, or the disclosure is required by law;
- Not use their position to gain, directly or indirectly, a personal advantage, or an advantage for any associated person, to the detriment of the company;
- Seek to avoid conflicts of interest and, where a conflict of interest exists, they must refrain from participating in discussions or decisions on related matters and provide the Managing Director with a description of the conflict in writing, which will be kept on file; and
- Abide by the letter and the spirit of applicable local, State, and Federal laws in carrying out their roles and responsibilities.

Breaches of this code of conduct

At all times, Metropolis Research employees must:

- Abide by this Code of Conduct and ensure that no breaches occur; and
- Report known breaches of this Code of Conduct in writing to the Managing Director, detailing the date, time, and nature of the alleged breach along with any available supporting material.

The Managing Director has ultimate responsibility for ensuring that all employees abide by this code of conduct. When presented with a written allegation that this Code of Conduct has been breached, they are required to investigate the allegation and to keep on file a written record of the outcome of their investigation.

If an employee is found to have breached this Code of Conduct, the Managing Director is responsible for sanctioning disciplinary action, including dismissal, of the employee in accordance with the severity of the breach.