



# Code of Conduct

## Core Values

The Core Values of Jumbo Interactive Limited and its subsidiaries (**Jumbo**) are the guiding principles that underpin our vision, culture and overall philosophy. Essentially, our Core Values help to define our ways of working, what we care about, what we promise our employees, and how we set our priorities. Our Core Values are that we:

- are open and respectful
- are adaptable
- take ownership
- create possibilities; and
- exist for our customers

All officers, employees and consultants (**Workplace Participants**) are expected to act in accordance with Jumbo's Core Values and in the best interests of Jumbo.

## Conflicts of Interest

Workplace Participants must act in the best interests of Jumbo as a whole, and shall engage in and promote honest and ethical conduct, including the ethical disclosure and handling of actual or apparent conflicts of interest between personal and professional relationships. For further guidance, refer to Jumbo's Conflict of Interest Policy.

## Corporate Opportunities

Workplace Participants must not take advantage of their position or information acquired in the course of their duties, or misuse information for personal gain or to cause detriment to Jumbo or its customers. For further guidance, refer to Jumbo's Conflict of Interest Policy.

## Confidentiality

Confidential information received in the course of the exercise of a Workplace Participant's duties remains the property of Jumbo and it is improper to disclose it, or allow it to be disclosed, unless that disclosure has been authorised by the Chair of the Board of Jumbo Interactive Limited (**Chair**) with consideration to the persons concerned, or as required by law.



## Fair Dealing

Workplace Participants shall act honestly and with high standards of integrity in all of their dealings with other employees, suppliers, customers, and competitors such that the best interests and reputation of Jumbo are maintained and enhanced. Workplace Participants will not engage in bullying, harassment, or discrimination. For further guidance, refer to Jumbo's Respectful Workplace Policy.

## Protection of Assets

Workplace Participants must use their best endeavours to protect Jumbo's assets and ensure that those assets are used for business purposes only.

## Compliance with Laws & Regulations

Workplace Participants have an obligation, at all times, to comply with the spirit, as well as the letter, of the law, including any applicable rules and regulations which apply to Jumbo's operations.

## Promotion of Ethical & Lawful Behaviour

Workplace Participants should at all times strongly encourage legal, responsible, and ethical behaviour. If a Workplace Participant becomes aware of unlawful or unethical behaviour, or a breach of this Code of Conduct by anyone within Jumbo then they are obliged to report such activities to the Chair or where the conduct in question is attributable to the Chair, then the Chair of the Audit and Risk Management Committee. Information provided should be treated in a discrete and confidential fashion and the matters dealt with expeditiously.

## Review

This Code of Conduct will be periodically reviewed to check that it is operating effectively and whether any changes are required.

## Disciplinary action

This Code of Conduct contains instructions and directions that Workplace Participants must comply with. In the event that Jumbo discovers a breach of this Code of Conduct by a Workplace Participant, that Workplace Participant may be subjected to disciplinary action up to and including the termination of their employment or engagement.

This Code of Conduct is not intended to create contractually binding obligations upon Jumbo, or to form part of any agreement or contract. The requirement to comply with



this Code of Conduct is a lawful and reasonable direction.

This Code of Conduct (and any other Jumbo policy or procedure) may be varied from time to time by Jumbo in its discretion.

### Revision and authorisation

Approval date	Replaces version dated	Sponsor	Approved by	Next review date
28/11/2024	30/11/2023	General Counsel	Board	28/11/2025