

Our ways of working

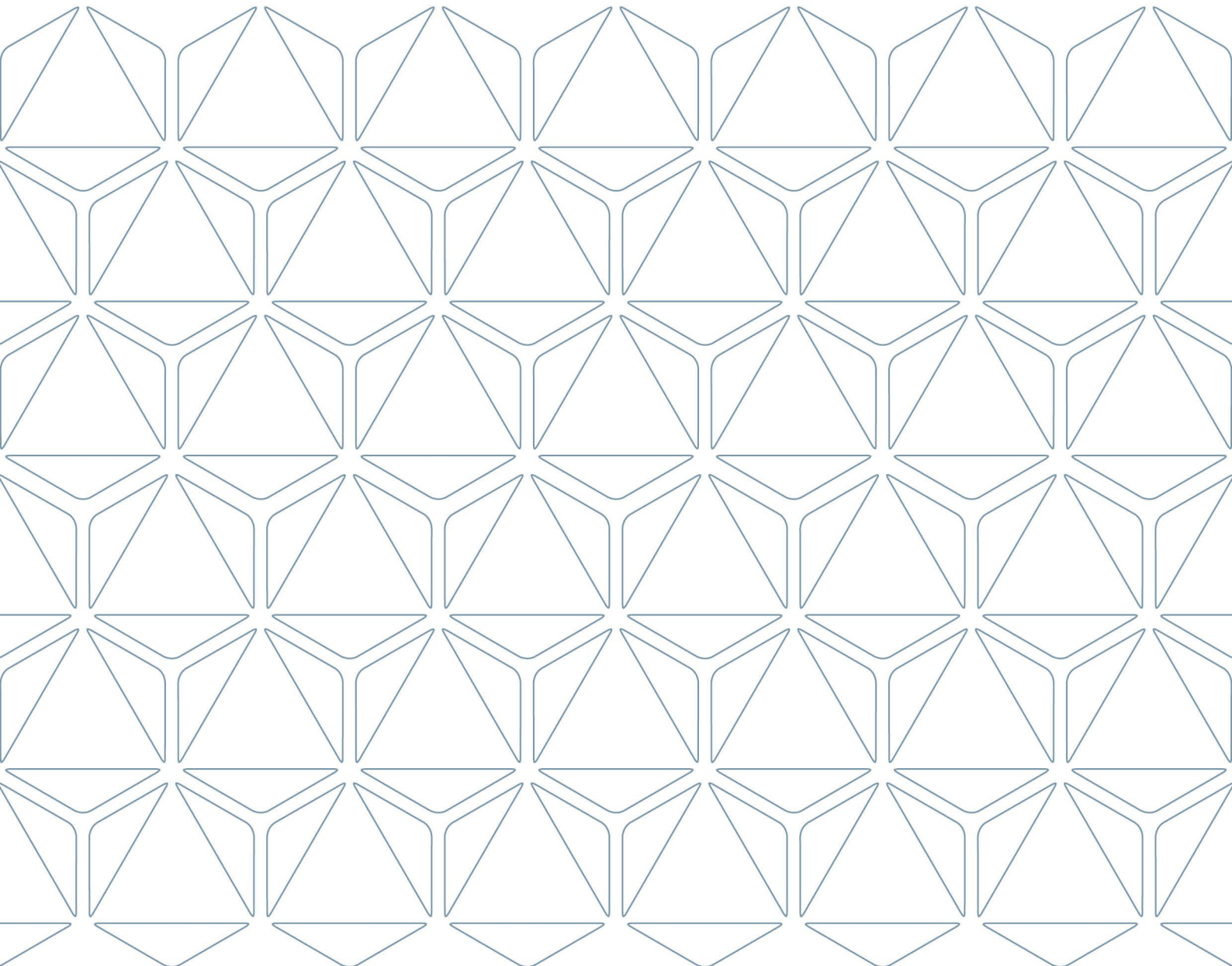


Praemium Limited

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Background

Praemium Limited (Praemium) is an ASX listed public company that operates across Australia and Armenia and has wholly owned subsidiaries including Praemium Australia Limited, Powerwrap Limited and MWH Capital Pty Limited (collectively Praemium).

The Group provides a number of products and services including financial software and technology, investment administration, financial products and investment platform administration.

At Praemium we are committed to maintaining the highest legal standards and ethical behaviours. We conduct our business within the framework of applicable laws and regulations, including the ASX Corporate Governance Principles and Recommendations (4th Edition). However, for us compliance with the law is not enough. Our values give insight into what is right and wrong and what is important for us all to succeed. They are, in effect, the foundation of Praemium.

Purpose

The purpose of Our Ways of Working is to create an ethical framework which outlines our values and how we strive to live these values in our day-to-day activities. Our Ways of Working outlines the practices undertaken by Praemium to instil a culture of acting lawfully, ethically and responsibly.

Our Ways of Working does not restrict our team's diversity, nor does it specifically address all issues that you will encounter. Rather it is a way of tying us together and guiding us in making decisions.

Who does this Policy apply to?

Our Ways of Working applies to all team members including directors, officers, employees, consultants and contractors. It applies while working on behalf of Praemium (whether during or outside working hours) and applies when you:

Work away from the office

- Travel for work
- Attend any location or function for work
- Attend a Praemium sponsored event
- Interact with persons with whom you have dealings with through Praemium, including clients, advisers, suppliers or other third parties

You have an obligation to know and understand Praemium's values and ethical principles. Our Ways of Working will be communicated to you:

- As part of your on-boarding program when you commence with Praemium; and
- by participating in regular and ongoing refresher training/seminars.

Non-Compliance

Any non-compliance with and breaches of Our Ways of Working will be taken seriously. All matters will be investigated and assessed on a case-by-case basis and Praemium Personnel may be subject to disciplinary action, which may include termination of employment.

Related Policies

Our Ways of Working should be read in conjunction with Praemium's other detailed policies including, but not limited to:

- Non-Discrimination; Harassment and Bullying Policy;
- Occupational Health, Safety and Wellbeing Policy
- Privacy Policy
- Shareholder Communication Policy
- Whistleblower Policy
- Trading Policy
- Conflicts of Interest Policy and
- Anti-Fraud, Bribery and Corruption Policy.

It is important to familiarise yourself with Praemium's policies and make sure that you understand and adhere to the expected standards of behaviours throughout your employment or engagement.

Roles & Responsibilities

Role	Responsibility
Board	<ul style="list-style-type: none">• Approve Our Ways of Working and have oversight of Praemium's culture and values.
Remuneration & Nomination Committee	<ul style="list-style-type: none">• Monitor Praemium's compliance with its obligations under Our Ways of Working.• Oversee any breaches of Our Ways of Working.
People & Culture Team	<ul style="list-style-type: none">• Manage and administer Our Ways of Working.• Provide regular training to Praemium personnel.• Manage any disciplinary action associated with breaches of Our Ways of Working.
Risk and Governance Team	<ul style="list-style-type: none">• Assess breaches of Our Ways of Working in accordance with the Incident & Breach Handling Policy.
Praemium Executive	<ul style="list-style-type: none">• Take reasonable steps to ensure Praemium Personnel are aware of their responsibilities under Our Ways of Working.
People Leaders	<ul style="list-style-type: none">• Take steps to identify and manage risks in your area, including those that may arise through the conduct of your team.• Encourage your team members to abide by Our Ways of Working and hold them responsible for doing so.• Shape the culture and working environment of your team.• Lead by example and set expectations that work is to be undertaken ethically and with integrity.
Employees	<ul style="list-style-type: none">• Comply with Our Ways of Working.• Report any instances of non-compliance with Our Ways of Working to your manager, the CPCO or Chief Risk Officer (CRO).

We place our clients at the centre of everything we do

Our primary focus is our clients. We seek out what our clients want and what is key to them, and we are not satisfied until they are

We are devoted to collaboration and teamwork

Across teams and departments, allowing everyone to contribute with unique skills, we work together to achieve our goals and deliver excellence.

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We are consistent and reliable

We aspire to the motto, "At Praemium it just works". No matter how complex the problems are, our clients love us as we solve and deliver consistent high-quality solutions and services.

We take ownership and champion continuous improvement

We hold ourselves accountable for what we do and our results, with a mindset that allows us to improve continuously.

We lead by example and influence positive results

Our leaders empower our teams through open communication with trusted directions inspiring them to find solutions and go above and beyond for the best results.

Our Values in Action

We place our clients and shareholders at the centre of everything we do:

We only accept and give appropriate gifts and entertainment

We accept or provide entertainment or gifts if reasonable and appropriate in the context of Praemium's expectations and operations, as well as within the law. We define gifts as physical objects as well as services, favours, and anything else of value (monetary or otherwise).

When giving gifts or providing entertainment, we ensure the gift or entertainment are appropriate and professional as per the requirements of Praemium's Conflicts of Interest Policy.

We do not accept any gifts, entertainment or benefits which are likely to conflict or create the appearance of conflict.

We focus on delivering the highest value

We are driven to meet the needs of our clients and shareholders. We deliver the highest possible value in the products and services we provide. We listen to our clients and shareholders to understand their needs and challenges and to deliver products, services and solutions that help them succeed. We are respectful of our clients' and shareholders' different values, beliefs, cultures and religions.

At a personal level we believe in the difference we make, and we always do what is in the best interests of our shareholders, clients, suppliers', partners and each other.

We avoid and proactively manage potential and actual conflicts of interest

We have a Conflicts of Interest Policy which outlines our personal and professional obligations relating to any actual or potential conflicts of interest whilst employed by Praemium. We avoid any circumstance where it might be perceived that we have or are likely to have a conflict between the performance of our professional duties and obligations to Praemium and our personal interests, or the personal interests of others.

We do not engage in any outside employment or other business activity in any capacity without the prior written consent of Praemium. We do not allow a conflict of interest to arise due to personal relationships with one another. We disclose the existence of a personal relationships in the workplace if there is potential for a conflict of interest.

We notify the Chief Risk Officer or the Chief People and Culture Officer if any situation arises that involves a conflict of interest.

We are devoted to collaboration and teamwork when:

We value the unique contribution of our employees

We value the unique contribution that we all bring to Praemium. We accomplish more as our team members are from diverse backgrounds and have different talents and ideas. We believe that working together in an environment where everyone can contribute is essential.

We are open and transparent

We are open and transparent and all interactions are governed by our policies and procedures.

We communicate with each other in a respectful, fair, honest and open manner. We listen to other points of view, ideas and thinking, suspend judgment and hear with intent. We approach every situation with a learning mind and are open to new information and ideas. We embrace new ways to challenge our thinking.

We have a Whistleblower Policy which provides a confidential and secure process for receiving, advising on, handling, and addressing any actual or potential wrongdoing.

Any communication to regulators and investors is fair, accurate, timely and understandable.

We encourage anyone to raise concerns through either the Whistleblower process or by speaking to the Chief Risk Officer or the Chief People & Culture Officer.

We do not accept inappropriate behaviour

We do not accept offensive messages, derogatory remarks and inappropriate jokes. We do not tolerate any form of abuse or harassment. This includes actions that can be considered as offensive, intimidating or discriminatory, as well as any form of sexual harassment.

We make employment decisions based on merit

We make employment decisions based on merit and performance, not on race, colour, national origin, religion, gender, age, sexual orientation, gender identity, marital status, disability, or any protected attribute outlined in applicable laws.

We are consistent and reliable when:

We abide by all legislative and regulatory requirements

We follow all legislative and regulatory requirements relevant to Praemium and its operations. Any breaches of legislative or regulatory requirements are reported immediately to the Chief Risk Officer or the Chief People and Culture Officer.

We restrict personal trading activities when applicable

We follow the obligations outlined in the Trading Policy and do not use inside information for personal benefit. We do not use or share inside information for trading purposes or for any other purpose except for the conduct of Praemium business. All trading activity undertaken by Praemium employees is done so in accordance with the Trading Policy.

We ensure appropriate use of computer resources

Computer resources are provided to help us do our work. Limited personal use is acceptable if such use does not interfere with job duties or negatively affects Praemium.

We protect confidential business information

The protection of confidential business information is vital to the interests and success of our clients, shareholders and Praemium. All non-public information about Praemium or other entities that Praemium has a commercial relationship with is confidential. Safeguarding our clients and privacy of team members is a priority.

We protect the confidential information of our clients and third parties. We do not under any circumstances, use the personal data of our clients and third parties.

If we suspect that there has been any actual or potential unauthorised disclosure or compromising of confidential information or personal information, we immediately notify the Chief Risk Officer.

We protect company assets

We use all reasonable endeavours to protect any Company asset and to ensure its efficient use. Company assets (e.g. a computer, telephone, credit card or money) are only used for legitimate business purposes.

Our communication is honest and transparent

We are honest and transparent in our communication, disclosures and reporting to stakeholders, including but not limited to, shareholders, clients, management, suppliers, the Board and regulators.

We never falsify, mislead, or create artificial entries in books, records or accounts. We cooperate with auditors or regulators in disclosing all relevant information.

We fully cooperate with all audits and investigations, through audit or through any regulatory or government authority dealings.

We take ownership and champion continuous improvement when:

We have a sense of accountability and ownership

When changes happen to us, or we create them, we step into them together. We say and do only what we believe to be true. We have a sense of accountability and ownership when things are going right and in the face of challenges. We give our best efforts, learn from our successes and setbacks and pursue opportunities to improve our performance.

We will not only "call out" deficiencies, but also advise clients on how we solve or correct deficiencies. We speak up about things that do not feel or look right and share our ideas to optimise upside risk.

We identify, manage and report risk

We take individual responsibility to identify, manage, control and report risk in line with our Risk Management Framework. We report issues, incidents, breaches and complaints as soon as we identify (or are made aware of) them. Our learnings from these areas are shared for the greater good.

We never accept or take on risks that we do not fully understand, and if we are unsure, we seek out those with the expertise until we are satisfied.

We use our Risk and Compliance training to further our understanding of our obligations and if there are gaps, we fill them in through our own research or by seeking answers from those with greater skill, knowledge or experience. We collaborate with each other to ensure end-to-end process excellence.

We lead by example and influence positive results when:

We deliver our promises

We go the extra mile for our clients, leave ego at the door and focus on their needs together.

We share ideas freely to create solutions that support our vision and purpose. We focus on what truly matters, even the tiny details, and get things done. Everything matters – even the little things.

We play an active role in delivering our promises every day by taking accountability for our objectives.

We make decisions with empathy

At a personal level we believe in the difference we make.

We always do what is in the best interests of our shareholders and clients and each other. We look for ways to delight people within and outside our organisation.

We look out for each other and make decisions as if it were impacting us, personally.

Guidance on using Our Ways of Working

Every day you face choices and make decisions. Sometimes the right thing to do in a situation is not clear. Sometimes we observe behaviour that is not right but do nothing or assume someone else will act. We all have a responsibility to adhere to Our Ways of Working and act if we see something that is not right. To help provide you with clarity, consider the following when faced with a decision or choice:

- Is the outcome consistent with Praemium's values?
- Do your actions comply with the requirements found in Our Ways of Working?
- Would I feel okay telling colleagues, friends and family about my decision?

When in doubt, contact either your people leader, the Chief Risk Officer or the Chief People and Culture Officer.

Reporting Rights and Responsibilities

We have formal mechanisms for you to report any workplace concerns regarding your personal employment, legal, regulatory or compliance matters. We encourage and welcome reporting workplace concerns. Consult the Praemium Whistleblower Policy for further information.

If you suspect or observe actual misconduct or improper actions in relation to Praemium, for example fraud, conflicts of interest, misuse of confidential information and the like, speak to the Chief Risk Officer.

Furthermore, consult the Whistleblowing Policy and follow the procedures for addressing misconduct or improper actions should you choose to do so, which you may do anonymously.

If you are concerned about the way you are being treated related to your personal employment, for example a conflict between you and another team member, bullying, breach of your employment conditions or related matters, or that of another employee, you are encouraged speak to your manager, if appropriate, or speak to the Chief People and Culture Officer. Consult the grievance policy or follow the step-by-step grievance procedures for addressing that treatment should you choose to do so.

Praemium does not tolerate any reprisal against a team member for raising a concern. If you believe that you or another team member is being subjected to retaliation, immediately report the matter to the Chief People and Culture Officer.