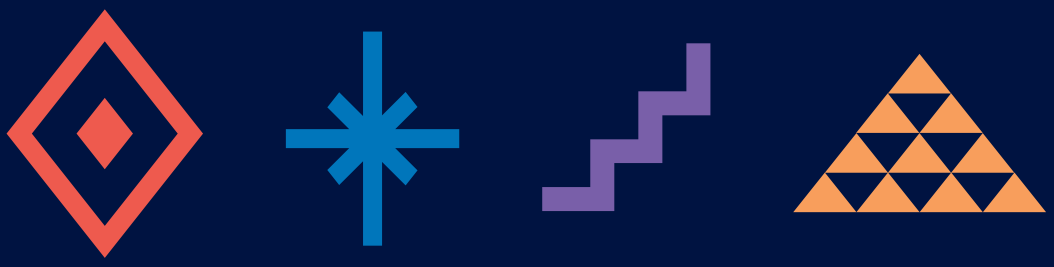
Code of Conduct



HEARTLAND

A message from Michelle

At Heartland, we are committed to doing what matters most for our people, customers, communities, shareholders, and other stakeholders.

That means respecting and valuing our diverse backgrounds, keeping our customers' needs and fair customer outcomes at the heart of everything we do, doing what's right for the communities we serve, and acting responsibly to provide value in return for the trust our shareholders place in us.

Our Code of Conduct describes the way we do things at Heartland and is underpinned by one of our values do the right thing. It provides a framework for making good decisions by setting out the standards expected of all Heartlanders and our intermediaries. It should be read in conjunction with all of our values and more detailed internal policies and procedures including Our Guide.

Heartland's Board and senior leadership team are committed to the Code and to lead by example, applying the principles of the Code to the work we do every day. All reported breaches of the Code will be recorded and addressed in accordance with Heartland's usual practices.

Please take the time to read through the Code. Working together, respecting our differences, acting with integrity and keeping our stakeholders' best interests and outcomes at heart is what makes us who we are.

As Heartlanders:

- we seek to achieve fair outcomes for our customers and do the right thing by our stakeholders
- we are professional and act with integrity
- we manage conflicts of interest appropriately
- we are committed to complying with all laws and meeting community expectations – we treat people withdignity and respect – we protect privacy and confidentiality.

Michelle Winzer
Chief Executive Heartland Bank Australia

Do what's right and true.

We seek to achieve fair outcomes for our customers and do the right thing by our stakeholders

We are committed to achieving fair outcomes for our customers and doing the right thing by all of our stakeholders, including our people, our customers, our communities and our shareholders. This is crucial – our success as a sustainable business depends upon it.

What this means for you

- When designing or selling a product (or when working at any stage of a product's lifecycle), keep customers' needs at the heart of what you do to ensure the product is suitable for their needs.
- Make sure you provide the information and advice our customers should have to make the right decision for their needs.
- Listen carefully to customers and address any feedback or complaint fully, fairly and in a timely manner.
- Be aware of changes to our customers' circumstances so that we can continue to provide them with quality service and support.

Speak up if you see something of concern about a customer or supplier, such as possible labour abuses or improper employment practices (modern slavery). Talk it through with your people leader or get in touch with someone in People & Culture, Risk or Compliance.

We are professional and act with integrity

We are committed to ensuring that we meet the highest standards of professional behaviour, including that we act with honesty and integrity in all of our activities. We are conscious of community expectations of us and are committed to upholding standards of behaviour which meet those expectations.

We do this by ensuring that:

- We have the skills and experience to competently provide our products.
- We foster an environment where our people are encouraged to speak up when they see instances of non-compliance or inappropriate behaviour.
- We properly investigate instances of noncompliance and protect people who speak up.

What this means for you

- Don't provide information or advice which extends beyond your expertise.
- Make sure you're up to date on your training requirements.
- If you see something of concern, speak up – talk it through with your people leader, get in touch with someone in People & Culture, Risk, or Compliance send an email to speakup@heartland.co.nz, or refer to our Whistleblowing Policy on Pulse.

We manage conflicts of interest appropriately

We are committed to ensuring that any interests that may conflict with those of our customers or other stakeholders are dealt with appropriately.

What this means for you

- Do not accept gifts or personal benefits which could reasonably be perceived to compromise or influence any decision.
- If you're in a situation where it's appropriate to give or receive cultural gift (koha), seek approval from your people leader beforehand – this will be approved after taking the relevant circumstances into account. For gifts (koha), you may also wish to seek cultural guidance from People & Culture.
- Disclose any relationships (including with other employees) which are actual, perceived or potential conflicts of interest. Discuss this with your people leader to ensure that any conflict of interest is mitigated and managed appropriately.
- Obtain consent from your people leader before taking up secondary employment as this may be considered a conflict of interest.

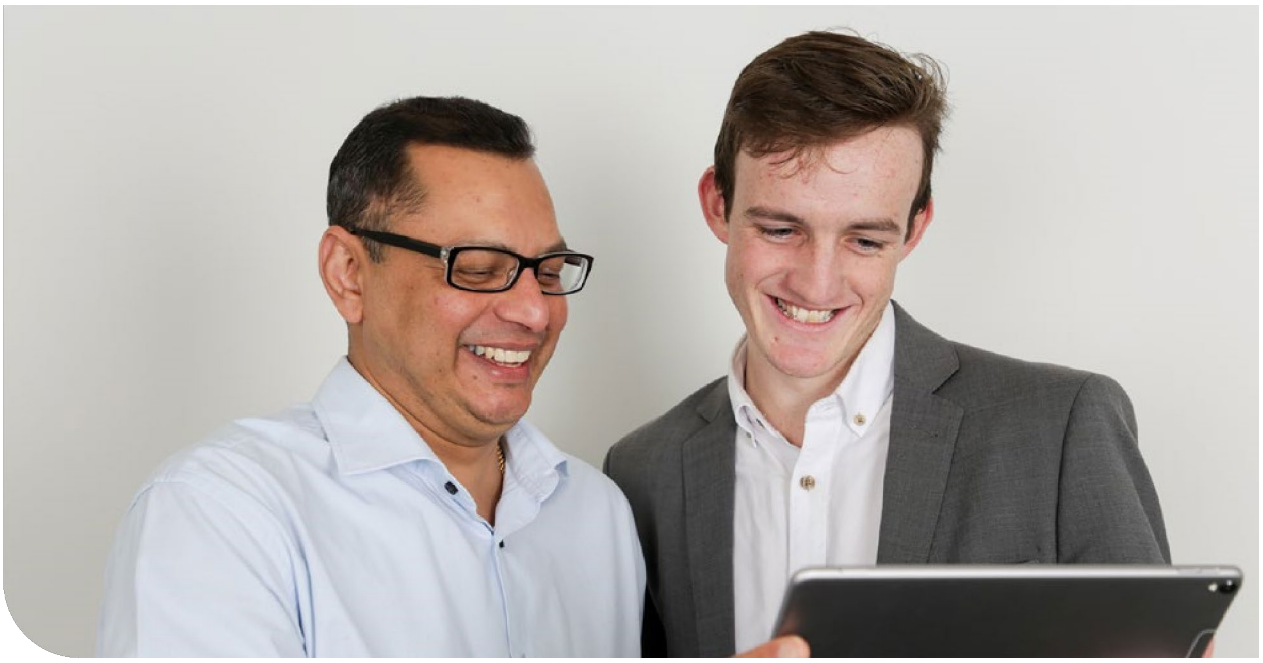
We are committed to complying with all laws and meeting community expectations

We are committed to fully and transparently complying with all applicable laws(including the underlying spirit and purpose of a law), other standards or practices with which we voluntarily comply, and internal policies. Our internal policies include best practice policies, such as an Insider Trading Policy, and a Whistleblowing Policy.

We are aware that community expectations often exceed the standards required by relevant laws. Where this is the case, we are committed to meeting those expectations.

What this means for you

- Make sure you are aware of and understand applicable laws, standards and practices, and internal policies and procedures.



- Complete training about laws, policies, and procedures when the training has been assigned to you.
- If you're unsure about any laws or community expectations, ask your people leader for guidance.

We are supportive of our employee's wellbeing including an understanding of an employees right to disconnect. We are committed to being a responsible corporate citizen and fulfilling all of our obligations relating to employment practices – including ensuring a safe, diverse and inclusive workplace for all of our people.

We do this by having best practice policies and procedures with associated training and regular communications. Policies and procedures include Workplace, Health & Safety, Diversity and Inclusion, and Prevention of Harassment, Discrimination and Bullying Expectations and behaviours are set out in these policies and are role modelled by our leaders.

What this means for you

- Treat each other, our customers, shareholders and members of the community with dignity and respect.
- Support and help each other as one team.
- Read and understand our best practice policies and behaviours and apply the behaviours from these to the work you do every day.

We protect privacy and confidentiality

We are committed to protecting the privacy and confidential information of our people, customers and shareholders.

Our Privacy Officer is the nominated contact point for privacy and confidentiality complaints, deals with requests made under the Privacy Act.

What this means for you

- Comply with the requirements of the applicable privacy legislation – this relates to how we collect, protect and use personal information.
- Read, understand and keep up to date with your training on our privacy and confidentiality obligations.
- Send any privacy requests or complaints to our Privacy Officer.

The Board of Heartland Bank (Australia) approved its Code of Conduct on 26 May 2026.