



AIMS Funds Management
A Member of AIMS Financial Group

CODE OF CONDUCT POLICY

June 2019

Table of Contents

1. Purpose of the Code of Conduct.....	1
2. Who the Code Applies To	1
3. Core Values	1
4. Expected Conduct of Employees	1
5. Conflicts of Interest	2
6. Gifts and Entertainment	2
7. Consequences of Breaching the Code.....	3
8. Whistleblower Protection.....	3

1. Purpose of the Code of Conduct

The AIMS Funds Management (AIMS) group of companies consists of AIMS Fund Management Limited, AIMS Real Estate Funds Limited and AIMS Investment Managers Limited.

The Code of Conduct (Code) document has been prepared to ensure that team members adhere to a strict regime of fiduciary responsibility and its objectives are outlined below:

- The nurturing of a team approach to the attainment of the business objectives;
- The maintenance of the highest levels of integrity and commitment to client confidentiality;
- The commitment to uncompromising levels of customer service; and
- Aiming to be the best in all facets of our business.

2. Who the Code Applies To

All employees (including directors, senior executives and contractors) are required to observe the Code and to act with the utmost integrity, objectivity and in compliance with the law and the company policies at all times in their dealings with each other, competitors, customers, suppliers, the company and the community.

The Code is discussed with each new employee as part of their induction training and if there are any further questions regarding the Code or any of AIMS's policies, employees should not hesitate to contact their Manager or the Company Secretary.

3. Core Values

Employees should observe the highest levels of professional conduct in undertaking their business activities, in light of the core values of:

- Trust
- Integrity
- Honesty
- Respect

4. Expected Conduct of Employees

Employees are expected to conduct their business affairs in accordance with this Code by:

- acting in the best interests of unitholders over and above their own interests.
- acting honestly and with high standards of personal integrity.

- complying with the laws, regulations and internal policies, including in relation to the conflicts of interest.
- not knowingly participate in any illegal or unethical activity.
- preserving unitholder confidentiality and not misusing information at all times.
- protecting and promoting the integrity of the market.
- avoiding and/or disclosing any real or perceived conflicts of interest.

5. Conflicts of Interest

A conflict of interest arises once an employee's loyalties are divided to the extent that they may be perceived to interfere with the performance of their duties and responsibilities to AIMS. This may make it difficult for the employee to perform their role objectively and effectively.

Employees must act in the best interests of AIMS and not allow them to be compromised by personal interests or interests of family or friends.

Each employee is responsible for identifying conflicts, whether actual or potential, that arise during their course of business or employment and to manage the risk of conflicts of interests, employees must notify the Company Secretary or the Compliance Officer of them as soon as possible.

For further information regarding conflicts of interests and related party transactions, refer to our Conflict of Interest and Related Party Transactions Policy.

6. Gifts and Entertainment

Generally, gifts and entertainment given to or received from persons who have a business relationship with AIMS that are modest in value and appropriate to the business relationship may be accepted.

As a guide, you may only accept gifts and entertainment when they are offered on good faith, designed for a genuine and legitimate business purpose, are reasonable and proportionate in amount, and not intended to induce or reward you to act improperly.

A gift or entertainment beyond a business luncheon, dinner or theatre ticket to the value of \$500 pa per relationship should be referred to the Company Secretary for noting and approval.

However, gifts and entertainment should never be accepted or offered if:

- there is the intention to win business or influence business judgment;
- there is the possibility of a conflict of interest;
- the appearance of impropriety may arise;
- they are excessive and unreasonable
- they are in the form of cash or cash equivalents.

Employees must understand that any behavior contrary to this section not only contravenes the Code but also anti-bribery laws in Australia and other countries which may lead to serious penalties.

If there is any uncertainty regarding the appropriateness of any gift, employees should immediately check with their Manager or the Company Secretary.

7. Consequences of Breaching the Code

AIMS recognises that breaches of the Code will inevitably occur but AIMS expects any breach to be unintentional and involuntary.

Employees must understand that breaches of the Code may result in disciplinary action including termination of employment. AIMS will act objectively in assessing the appropriate penalty with regards to the nature of the breach.

8. Whistleblower Protection

AIMS encourages employees to report any actual or suspected unethical behavior including breaches of AIMS's Code and policies. Such matters will be thoroughly investigated by AIMS.

AIMS is committed to protecting employees against any form of discrimination, harassment or victimisation in these situations and ensuring that concerns can be raised in confidentiality without any consequences to the extent permitted by the law.

Employees must ensure that any report must be made in good faith and that there are reasonable grounds for believing that there has been a breach of the relevant policies or Code. Any allegations that are made unsubstantiated or have been made maliciously will be viewed as a breach of the Code.

For further information regarding whistleblower protection, refer to our Whistleblower Policy.