

ETHICAL

DYNAMIC

PROFESSIONAL

Collection House Limited

CHG 016-1 COLLECTION HOUSE PHILOSOPHY

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| Approved: | Michael Watkins, General Counsel |
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HOW TO READ THIS DOCUMENT

Our Philosophy is made up of two parts. Firstly, it covers the standards and guiding principles that Collection House as a company follows. Secondly, and most importantly, it will give you an idea of what these ideals mean to you and your colleagues, how you might strive to assist us all in meeting our moral and professional goals and why this is important to you. We have amalgamated these two parts into one text, grouped together under consistent headings to make it easier to read.

You will find that general information about the Collection House Philosophy is written in normal text, numbered according to the heading it relates to.

Information that will assist you in applying our principles has been highlighted like this.

1 POLICY

- 1.1 Our Philosophy is to deliver exceptional service with the very highest standards of personal and professional integrity and honesty.
- 1.2 We expect all employees to take responsibility for their own actions and to behave in a way that enhances the reputation of Collection House in the eyes of our clients, customers, colleagues, stakeholders and the community.
- 1.3 This Philosophy will guide you on our corporate objectives, ethical issues and expected standards of behaviour at Collection House.
- 1.4 By accepting employment with Collection House you agree to not only comply with the Collection House Philosophy, but to also strive to ensure that it is upheld by all Collection House staff.

2 OUR OBJECTIVES

- 2.1 Our corporate objectives are to:
 - attain and maintain market leadership in all our businesses;
 - develop and display industry best practice in terms of our ethical standards and compliance with the laws and regulations governing our business activities;
 - be reputed as a good corporate citizen with the highest standards of integrity, ethics, practice, privacy and security;
 - be recognised for providing exceptional service in terms of our quality, technology and innovation;
 - be recognised as an employer of choice, nurturing the diverse talents, skills and abilities of our employees in an equal opportunities environment; and
 - sustain an optimal level of growth in sales revenue and profit earnings for our stakeholders.
- 2.2 You have a direct role in helping Collection House achieve its corporate objectives. It is important that you are aware of our corporate objectives and how your role contributes to the overall success of our company.

3 OUR VALUES

- 3.1 Our values are:

Integrity

- Being fair, open and honest in our dealings with people and sensitive and discreet with the information entrusted to us.

Excellence

- Delivering exceptional service by listening to our colleagues, clients and customers, identifying their needs and developing solutions that exceed their expectations and improve their experience of dealing with us.

Understanding

- Valuing and respecting our colleagues, clients and customers, understanding their different goals and objectives and how they contribute to the overall success of our company. Creating an environment where diverse talents, skills and abilities are recognised and nurtured to their full.

Ethics

- Maintaining the highest standard of business principles and ensuring our personal conduct and service are professional, ethical and honourable at all times.

Teamwork

- Empowering the individual, encouraging open communication and co-ordination within business units and across the whole company to achieve an efficient team focused on our corporate objectives.

3.2 Our values are the backbone of our business. You should keep these values foremost in your mind when undertaking any task or duty for Collection House.

4 OUR STATEMENT OF PROFESSIONAL PRACTICE

4.1 This guideline is complementary to our internal policies and procedures. We will provide sufficient training to ensure they are understood by all employees and/or its subsidiaries, as appropriate.

4.2 Our statement of professional practice is:

Quality Service

- We will protect and develop our business by listening carefully to clients, customers and colleagues and providing them with a prompt and efficient service.
- You should know your job and the company's instructions applying to it, follow directions, exercise and not exceed the authorities and discretions delegated to you and act in a manner which will enhance the good reputation of the company.
- You should strive to improve the skills, knowledge and competencies required for your position. You should attempt to understand the different goals and objectives of clients, customers and colleagues and how they are aligned to your personal goals and our overall corporate objectives. Make it a part of your work practice to actively identify the needs of clients, customers and colleagues and to offer innovative solutions that exceed their expectations.

Laws and Regulations

- The laws and regulations governing our activities are designed to ensure high ethical and professional standards. Collection House will provide its employees with training to ensure they have a working knowledge of the laws and regulations governing their positions.
- You should seek further guidance and training from your manager if you identify any gaps in your knowledge of the law during the conduct of your duties.

Policies and Procedures

- We have a suite of internal policies and procedures to ensure that we comply with the laws and regulations of all the jurisdictions in which we operate. Our internal policies and procedures adopt the highest standards of professional conduct within Australia and in New Zealand. By complying with our internal standards, our employees will operate in accordance with or at a higher level than their local jurisdictional requirements.
- It is essential that you are familiar with, adhere to and support our internal policies and procedures at all times.

Honesty and Integrity

- The reputation of Collection House depends upon our honesty and integrity. Every person we deal with has the right to be confident that we are totally honest and our dealings with them are beyond reproach.
- We will accurately represent information to clients, customers and colleagues. Facts will be provided in an honest, fair and complete manner and information will not be presented in a more or less favourable light than it warrants.
- Regardless of your position, you are responsible for providing leadership by maintaining a high level of personal honesty and integrity and contributing to a culture where ethical and professional conduct is recognised, valued and exemplified.

Ethics

- Collection House will proceed with a high level of ethical standards in all its dealings. We will not profit from the information or position we hold in any way other than through an acceptable commercial practice.
- Collection House will not tolerate any practice of insider trading.
- You should avoid placing yourself in a position where you may stand to gain a secret benefit even indirectly from a transaction between Collection House and another party.
- You should ensure that your personal relationships with clients, customers or colleagues do not influence or prejudice their obligations to Collection House.
- You must not accept any gifts or favours which might influence or appear to influence your business judgement.
- You are not to profit, trade or deal with any information acquired in the course of your employment, unless that information is public information.
- Where there is any likelihood of a conflict arising, you should make a full disclosure to the company.

Equal Opportunity

- Harassment and discrimination in any form are not acceptable in Collection House.
- Collection House will provide equal opportunities to all persons regardless of age, gender, race or personal preference who are legitimately able to assume a position with the company.
- You are to respect our company's policy of providing equal employment opportunities for all employees. You are to work with your fellow employees as a team to ensure a safe and harmonious workplace free of harassment and discrimination.
- Compliance with Collection House policy and procedures is a condition of your employment. If your personal views run contrary to policy and procedure, you should take the matter up with Human Resources.

Privacy

- Collection House will protect and maintain the privacy, accuracy and security of all personal information it obtains in any manner. Our Privacy Policy covers this in more detail.
- Employees must conform to the requirements of our Privacy Policy and will receive training to assist them in this regard.

Confidentiality

- Collection House will treat all the affairs of the company, its clients, customers and colleagues as strictly confidential information. Information will be handled in an absolutely confidential, discreet and sensitive manner.
- You must keep secret all confidential information and trade secrets you may encounter during the course of your employment relating to the business strategies (including the strengths, weaknesses, opportunities and threats to the business) and financial information of the company and/or its subsidiaries at all times.

Communication

- Collection House will foster a positive working environment by encouraging open, effective communication with all clients, customers and colleagues.
- You are to understand the different operations of our company and maintain effective communication and cooperation with those persons working in different divisions and levels within the company.

Teamwork

- Collection House recognises and values the diverse talents, skills and abilities of all its employees and will maintain an environment where each employee's contribution is recognised as benefiting the team effort.
- You should work with your fellow employees as a team and treat each other with respect and dignity, striving for a safe, harmonious and efficient workplace.
- You should always consider the impact of your behaviour on colleagues and the overall corporate objectives of the company.

Good Corporate Citizen

- Collection House will strive to be a good corporate citizen when pursuing our corporate objectives.
- You should consider what impact your behaviour may have on the company's reputation in the community.

- 4.3 You should understand and observe this guideline and all Collection House policies and procedures.
- 4.4 It is important that you always strive to give effect to our values when performing your duties.
- 4.5 Generally speaking, if you always act honestly, exercise commonsense and ask your supervisor for help if you are unsure of how to act, you should not encounter any problems in observing the principles contained in this statement.

5 COMPLIANCE WITH OUR PHILOSOPHY

- 5.1 Each one of us is responsible for our own actions.
- If you are unsure whether your actions, or those of a fellow employee, breach our Philosophy, you can always seek information, in confidence, from a manager or supervisor.
 - Employees who breach our Philosophy may face disciplinary action. This may include dismissal.
- 5.2 From time to time it may be necessary for Collection House to review and revise our Philosophy. Collection House reserves the right to change our Philosophy at any time. Collection House will publish the revised version of our Philosophy on our website.