



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 (Directors and Company Secretary), Senior Executives (being the Chief Executive Officer, Chief Financial Officer, Chief Operating Officer, Chief Technology Officer and Chief People Officer), and Employees are expected to act in accordance with Jumbo's Core Values and in the best interests of Jumbo.

Conflicts of Interest

Officers, Senior Executives, and Employees of Jumbo must act in the best interests of Jumbo as a whole. Officers, Senior Executives, and Employees 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.

Corporate Opportunities

Officers, Senior Executives, and Employees 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.

Confidentiality

Confidential information received in the course of the exercise of an Officer, Senior Executive, or Employee'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

Officers, Senior Executives, and Employees 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. Officers, Senior Executives, and Employees will not engage in bullying, harassment, or discrimination.

Protection of Assets

Officers, Senior Executives, and Employees 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

Officers, Senior Executives, and Employees 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

Officers, Senior Executives, and Employees should at all times strongly encourage legal, responsible, and ethical behaviour. If an Officer, Senior Executive, or Employee 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. 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.

Revision and authorisation

Approval date	Replaces version dated	Senior Leadership Group sponsor	Approved by	Next review date
30/11/2022	11/11/2019	Head of Legal	Board	30/11/2023