



Welcome aboard  
the rocket ship

# Code of conduct

No matter your position at Afterpay, we all stick to the same high standards and values, as well as complying with the laws of the countries we operate in. Our Code of Conduct sets the expected standards of professional behaviour linked to our values. The code is about steering the collective moral compass of the talented people who work at Afterpay.

Please treat our Code seriously both literally and in spirit.

**Anthony Eisen** CEO & Managing Director

Approved by the board of directors on  
25 August 2020

Our values—The truth that guides us

## Keep it Real

We are genuine and have no time for BS.  
We feel able and proud to bring our authentic self to work every day.  
We are clear and sincere in our words and back them up with action.

## Be Brave

We back intuition and celebrate curiosity.  
That's how we innovate.  
We approach our work with courage, tenacity and a healthy dose of grit.  
We finish what we start and commit as one team.

## Do the Right Thing

We look for the win/win on behalf of every stakeholder.  
We hold ourselves accountable for our actions.  
We act with honesty, humility and transparency.

## Shape the Future

We are perpetually excited about the opportunities ahead of us.  
We make thoughtful decisions quickly and execute them with intensity and quality.



## Ready for lift-off

Afterpay is built on, and our business practices should always reflect, openness, honesty, fairness and integrity. And our success depends on our relationships with each other, our customers, shareholders and third parties.

### **Things you need to know before you get to work**

- Treating everyone respectfully keeps the work place safe and is consistent with Afterpay's commitment to fostering a diverse workforce and an inclusive culture.
- Confidential information must not be shared unethically and personal information may only be collected, used and shared in accordance with our Privacy Policy.
- Everything generated at work is the intellectual property of the company and must be protected.
- Personal gain must not come at the expense of the company, customers or investors.
- An individual may only act within the limits of their authority on the company's behalf.
- Any behaviour that could be construed as unethical, oppressive or coercive is unacceptable.
- Any intimate or personal relationship where there is a real or perceived conflict of interest must be disclosed to your manager or, if appropriate, a member of the Global Leadership Team

## Blasting ahead

It's in our everyday business operations that Afterpay's key values must stand the test. As a global company, it is critical we comply with the laws and regulations of each location, and the team must not participate in any practices that could compromise the company's reputation.

### **Things to keep in mind while you are working**

- Information about competitors may only be obtained in lawful ways.
- Negotiations must be built on accuracy and honesty.
- All contracts must be honoured.
- Insider trading, or passing on confidential inside information, is against the law (refer to the Securities Trading Policy for more information).
- Gifts that go beyond the common courtesies associated with ordinary business must not be accepted (refer to the Anti-bribery and Corruption Policy and the Gifts and Hospitality FAQs for more information).
- There are serious legal consequences to accepting or offering bribes.
- Company expenses and transactions must be accurately reported.
- Employees must do due diligence to avoid unknowingly partaking in illegal or unethical activity.

## Houston, we have a problem

To ensure a safe and prosperous work environment, we are all relying on each other to uphold the Code of Conduct. Whether you feel you've been put in a compromised situation or you suspect someone else has, we all have a responsibility to pay attention to any breaches and report them to HR or in accordance with our Whistleblower Policy.

### **What to remember when things go wrong**

- There is a personal responsibility to know the laws and regulations relating to our work.
- There are disciplinary consequences to breaching the Code of Conduct, including termination.
- Some consequences of code breaches can involve remedial action, including training and counselling.
- There are no penalties for speaking up if you have reasonable grounds to suspect misconduct or improper activity.
- Material breaches of the Code of Conduct will be reported to the Board or a Board Committee.
- The company has the right to inform authorities about any apparent breaches of law.
- Good motives are not an excuse for breaking the law.