



SUMMARY OF CODE OF CONDUCT

ASX's Code of Conduct (the “**Code**”) is summarised as follows:

1. The Code applies to anyone who is employed by or works at ASX, including employees, contractors, consultants, secondees and directors (“**you**”).
2. If you breach this Code you may be subject to disciplinary action including termination of employment.
3. You must:
 - a. Act in the best interests of ASX and with honesty, integrity and fairness.
 - b. Comply with the laws and regulations which apply to ASX and its operations.
 - c. Comply with this Code and the other policies and procedures of ASX.
 - d. Not knowingly participate in any illegal or unethical activity.
 - e. Immediately report any concern about a possible breach of the Code, or any other Reportable Matter.
 - f. Not enter into any arrangement or participate in any activity that would conflict with the interests of ASX, or would cause ASX to breach its licence obligations.
 - g. Not act in a way which would be likely to negatively affect ASX's reputation.
 - h. Not take advantage of ASX's property or information or your position (or opportunities arising from these) for personal gain or to compete with ASX.
 - i. Not take advantage of or misuse a third party's property or information.
4. It is management's task to achieve and the Board's role to oversee the delivery of shareholder value through the sustainable and efficient operation of ASX and sound reporting and risk management practices. A statement of ASX's policy regarding Shareholder Communication and Shareholder Meetings is available on www.asx.com.au.
5. ASX seeks to understand the expectations of its stakeholders and to respond appropriately to our economic, social and governance responsibilities. Details of current community programs that ASX supports are outlined on www.asx.com.au.
6. The occurrence and management of actual or perceived conflicts arise in a number of areas:
 - a. **Personal Conflicts:** These may arise in situations where your interests affect, or potentially affect, or appear to affect, your ability to properly undertake your role or make decisions. Those interests may include your financial, personal or other interests or those of your family or associates. Where a Personal Conflict arises, or may arise, you must disclose the nature of this conflict to your manager, who will ensure that measures are put in place to protect parties affected by the Personal Conflict. This may include disclosing the conflict to third parties, or ensuring that you do not participate in the relevant decision or activity.
 - b. **Director Conflicts:** Directors of an ASX company will be guided by the constitution of the relevant ASX company and will ensure that they abide by the provisions in the Corporations Act governing conflicts of interest together with ASX policies and guidelines. Where there is doubt, the matter should be raised with the Chairman of the relevant ASX subsidiary company, the Chairman of the Audit and Risk Committee or the Chairman of ASX Limited as relevant.
 - c. **Licensee Conflicts:** ASX manages conflicts or potential conflicts in the context of ASX's role as a market licensee and/or clearing and settlement facility licensee in a manner set out in the Conflicts Handling Arrangements Policy.

7. You must not breach your confidentiality obligations to ASX. In addition, you must treat confidential information belonging to a third party that you may obtain in the course of your duties consistently with your confidentiality obligations to ASX, as if that information was confidential information of ASX.

You must not seek to obtain confidential or sensitive information which is not relevant to the performance of your duties. You must also protect the confidentiality of information by complying with the Clear Desk and Information Handling Standard available to employees on the ASX intranet.

8. You must comply with all relevant laws and regulations concerning employment as set out in the ASX Diversity Policy which includes procedures relating to Equal Employment Opportunity. You must also comply with the Occupational Health and Safety Policy. Both policies are available to employees on the ASX intranet. ASX will endeavour to ensure that all employees are treated in a fair, equitable and honest way
9. You must comply with the Dealing Rules for Employees and Directors Policy, the Privacy Policy, the Information Handling Standard for the Trade Acceptance Service and any other relevant policies located on the ASX intranet.
10. You must immediately report any concern about a possible breach of the Code, or any other Reportable Matter, initially to your immediate manager. The procedures for reporting these concerns other than to your immediate manager are set out in the ASX Whistleblower Protection Policy available to employees on the ASX intranet.

The procedures provide for a staged escalation in a manner intended to ensure that employees are not disadvantaged in any way for reporting such concerns, that the matter is dealt with promptly and fairly, and that sensitive information is dealt with appropriately.

A “**Reportable Matter**” is any concern about the following conduct, or the deliberate concealment of such conduct:

- Financial irregularity (including a fraud against ASX or a customer).
- Corrupt conduct.
- Criminal conduct.
- Failure to comply with any legal or regulatory obligation.
- Failure to comply with any other obligation as a market licensee or clearing and settlement facility licensee.
- Unfair or unethical dealing with a customer (including participants and listed entities).
- Unethical or other serious improper conduct, including breaches of ASX policies.