



**DWS**

**DWS Limited**

**Code of Conduct  
All Personnel**

## **Code of Conduct for All Personnel**

This Code sets ethical standards for the all directors, senior executives and employees (collectively 'Personnel') of DWS Limited (Company) and reflects the intention to ensure that their duties and responsibilities to the Company are performed with the upmost integrity.

The conduct of all Personnel is governed by the following principles.

### **1. Integrity and professionalism**

- 1.1 All DWS Personnel will act honestly and with integrity in all of their dealings for the Company.
- 1.2 Personnel will maintain the highest levels of professional conduct in their interactions with colleagues, business partners and in representing the Company in the community.
- 1.3 Personnel will not discriminate on the grounds of people's race, religion, gender, marital status or disability.
- 1.4 Personnel will be truthful, and not mislead or make any false statements, nor mislead by omission. Personnel will not make promises or commitments that the Company does not intend, or would be unable, to honour.

### **2. Compliance with the law**

- 2.1 Personnel will abide by the law at all times.
- 2.2 Personnel are bound by the laws of the country and state in which they operate.

### **3. Conflicts of interest**

- 3.1 Personnel will fully disclose any business interest (public or private) and any other matters which may lead to potential or actual conflicts of interest, in accordance with such policies adopted by the Company from time to time.
- 3.2 Personnel owe their first duty to the Company. In circumstances where other roles potentially conflict with the Company's interests, employees will advise and seek approval from the Chief Executive Officer (CEO) and directors will advise and seek approval from the Chairperson in accordance with this Code.
- 3.3 Personnel will not use their role within the Company for political interests at any time or for community interests unless authorised by the Company.

#### **4. Confidential information**

- 4.1 Personnel must ensure that confidential information relating to the Company, its customers, its operations, or any other commercially sensitive matter, are not given either inadvertently or deliberately to third parties without the consent of the Company.
- 4.2 Other than in circumstances required by law, there is no reason for Personnel to reveal confidential information. Confidential information which is to be released to legitimately interested third parties shall only be made so available after appropriate authorisation procedures have been followed.
- 4.3 Personnel will maintain and observe their obligations of confidentiality and proper use of information even after leaving the Company's employment.

#### **5. Inside information**

- 5.1 Personnel must not use inside information for personal gain.
- 5.2 If an Employee has inside information (being price sensitive information, information not in the public domain or information about any entity related to the Company or a strategic partner of the Company which has come to the knowledge of the Employee through their employment by the Company), the Employee must not deal in that entity's securities or pass that information on to another person or encourage another person to deal in that entity's securities (securities includes shares, units or any form of derivatives such as warrants or options).
- 5.3 Personnel will comply with the Securities Trading Policy of the Company.

#### **6. Benefits to All Personnel**

- 6.1 Personnel must not use their status or title to seek personal gain from those doing business or seeking to do business with the Company.
- 6.2 Personnel of the Company must not accept payments, gifts or entertain beyond that which would be considered normal business practice. Employees must report the offering of any such benefit to the CEO and Directors must report the offer of any such benefit to the Chairperson.

#### **7. Fair dealing**

- 7.1 The Company is committed to fair competition and trading in all markets in which it operates.

- 7.2 Personnel will take into account the impact of health and safety and competition issues when making business decisions. Personnel will ensure that these business decisions do not compromise the Company's commitment to avoiding injury to people, damage to the environment or the maintenance of competitive markets, and will ensure that the Company complies at all times with all relevant laws.

## **8. Observance of the Code of Conduct**

- 8.1 All Personnel will report and record any behaviour that involves non-compliance with this Code. The CEO and Chairperson will be made aware of any such acts or behaviour and take any action that is considered appropriate in the circumstances. Personnel will take care to ensure that the application of this Code is enacted in word and deed.
- 8.2 All Personnel will work collaboratively and will apply the principles of this Code to their duties and responsibilities on a daily basis.