

Code of Conduct

Policy brief & purpose

Our Code of Conduct company policy is to set and maintain a standard for acceptable behaviour to all stakeholders in a company. It is a reminder to the employees of what is expected from them. It further highlights that their actions should be always aligned with the ethos of the business.

Control

Version	Created Date	Approved Date	Approved By	Description
1.0	21 st March 2022	31 st March 2022	Tony Clark, CEO	Baseline version
1.0		21 st March 2023	Tony Clark, CEO	No changes
2.0	2 nd June 2023	15 th June 2023	Tony Clark, CEO	Revised Code of Conduct & Our Values

This policy is reviewed and signed off annually at a maximum.

Scope

This policy applies to our company and its subsidiaries. It may also refer to suppliers and partners.

1. Code of Conduct

Here at NextWave we have a great deal to be proud of, we also have a lot to live up to. It begins with our commitment to quality and integrity. This commitment is fundamental to meeting our responsibilities and those of our global clients.

Our Code of Conduct intends to set out the behavioural expectations for everyone who works for and with us. It is based on our values, and shaped around our principles, personality and culture.

The code defines the behaviours which influence how we perform as individuals and as leaders, it encourages us to behave as role models, promoting passion towards our work and area of expertise.

The Code was established in 2021 as a way for our organisation to support the changing needs of the market. It provides an important framework for our company to meet the challenges of building and maintaining a sustainable consultancy that can adapt successfully in a rapidly changing environment.

The Code reflects how we live the attributes of our mission statement 'Partnering with our Clients to Build Better Financial Services Clients through Technology' and ensures we deliver our knowledge and insights to clients with clarity and perspective.

We continually strive to raise the expectations of ourselves, equalling the high standards set by our Code of Conduct and enabling us to be a solid contributor towards a stronger, more sustainable future for our clients and people.

Who must follow the Code?

All employees of NextWave are required to comply with the Code of Conduct and Company policies which govern our activities. It is the responsibility of every employee to know and follow the Code. The Code helps us make the right decisions and take the right actions, regardless of which client we work with or the type of work we do.

We believe that every employee is a leader, regardless of your job title or function. By following our Code, you serve as a role model for your peers, business partners, customers and others who see you in action every day.

If you have a management role, you have additional responsibilities to serve as a positive role model in every respect and to help your employees review, understand and apply the Code.

Individuals and companies conducting business on our behalf must also follow our Code of Conduct, in addition to other relevant Company policies. Applicable provisions of this Code should be included in the contracts of third-party suppliers, manufacturers, contractors, vendors and distributors acting on behalf of NextWave.

Where can we go for advice and guidance on the Code?

All NextWave Managers and the NextWave Leadership team are available to answer questions about the Code of Conduct.

The NextWave HR team are equipped to explain and answer questions about employment, benefits and workplace issues.

Our Values - PACIFIC

Passion

Enthusiasm and excitement for your work is the difference between getting things done, and getting them well done. We are as excited about Mondays as we are Fridays.

Ambition

We believe in constant learning, growth and goal setting. It's important to celebrate your achievements and then focus on all the new, exciting plans ahead.

Curiosity

Our team excels at problem solving, creative thinking, and networking. We are always driven towards improving ourselves and our work through learning.

Innovation

As natural innovators, we recognise areas for improvement and use logic, reason and creativity to come up with ways to improve them or develop new ideas.

Fun

We care deeply for our team's happiness and wellbeing, believing that enjoyment at work helps foster creativity. We host frequent, fun events that cater to all and provide a mental helpline for our staff.

Integrity

We are reliable, dependable and consistently practice open and honest communication with our clients, our staff and our partners. We believe in complete transparency.

Cooperation

Teamwork means building positive relationships. We combine everyone's unique skillset to build a digital acceleration community that drives innovation.

Our Way of Working

Working hours

We like to think NextWave is an environment for insightful, committed and passionate people and we operate significant self-management of your schedule internally, however when on client site we expect all NextWave members to maintain the working hours as contracted and expected by our clients, and when appropriate to apply flexibility with your working hours to ensure successful delivery and outcomes when working towards deadlines either internally or externally.

Behaviours & Attitudes

We lead by example: We demonstrate behaviour rather than just saying something should be done; at all levels we act in a way that exemplifies what we expect of each other.

We work together: bringing out the best in each other and creating strong and successful working relationships.

We seek the facts and provide insight: challenging assumptions, pursuing facts, and strengthening our reputation as trusted and objective business advisers.

We are open and honest in all communication: we share information, insight, and advice frequently and constructively manage tough situations with courage and sincerity.

Conflicts of Interest

Nextwave maintain highest standards of integrity and transparency in all our operations. With the principle of disclose, discuss, and decide; we will work towards preventing any conflict-of-interest occurrences.

Disclosure

Disclosure is key. If you face a grey area and are not sure if an activity presents a conflict of interest, talk to your manager, supervisor or anyone in the leadership team (designated individual). We also advise you refer to the Bribery and Corruption Policy (sect 2).

Discuss

Designated individual will discuss the matter with you and any relevant parties involved. The discussion must be transparent and help relevant parties to understand the potential implications of the conflict of interest.

Decide

Leadership team makes decision about any necessary actions to be taken to mitigate or manage potential conflicts of interest. If you have committed a deliberate conflict of interest for yourself, your employment may be terminated.