Groundfloor24

CODE OF CONDUCT POLICY

LAST UPDATED: May 25, 2026

This Code of Conduct Policy sets out the standards of professional behaviour, ethical practice, and compliance expected from all real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals operating under or in association with the Groundfloor24 brands, whether acting as independent contractors, affiliated professionals, franchise/market centre-based professionals, or any other authorised representatives of Groundfloor24.

This Policy applies to all real estate activities carried out using the Company's name, branding, systems, CRM, platforms, marketing materials, leads, or client relationships. It governs how real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must conduct themselves when dealing with clients, prospects, colleagues, franchise and market centre partners, regulators, and the public.

The purpose of this Policy is to protect clients, maintain trust in the brand, and ensure lawful and ethical real estate practices that apply in addition to contractual obligations. This Policy does not replace any agreement entered into with the Company, including the Independent Contractor Agreement, but operates alongside those agreements as a condition of continued engagement and association with the Company.

Compliance with this Code of Conduct is mandatory. Any failure to comply may result in disciplinary action, including warnings, suspension of access to Company systems or branding, restriction of activities, or termination of engagement, without limiting any other contractual or legal rights available to the Company.

If you have any questions or need any clarification, please reach out at onboarding@groundfloor24.com.

1. **Purpose and Scope**

   This section explains how this Policy is meant to be used in practice. It sets clear expectations for everyday conduct by real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals while carrying out work connected to the Company and helps each other understand the boundaries of acceptable and unacceptable behaviour.

   This Policy applies whenever an real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals is acting in a professional capacity linked to the Company, including communications, transactions, marketing, use of systems, and interactions related to Company business. It does not apply to an real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals purely personal activities that have no connection to the Company or its brand.

2. **Who This Policy Applies To**

   This Policy applies to all realreal estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals who operate under, are associated with, or represent the Groundfloor24 brands in any capacity. This includes real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals working as independent contractors, affiliated professionals, franchise/market centre-based professionals, or any other authorised representatives engaged by or connected with the Company.

   This Policy applies whenever an real estate professional (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professional uses the Company's name, branding, systems, CRM, platforms, marketing materials, client leads, or other Company resources, or holds themselves out as being connected with the Company.Rreal estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals are expected to follow this Policy regardless of where they are located or the jurisdiction in which they operate.

   Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals are responsible for ensuring that anyone acting on their behalf in connection with Company-related activities, such as assistants, subcontractors, or support staff, also follows the standards set out in this Policy. Failure to do so will be treated as a breach of this Policy by the agent.

3. **General Standard of Professional Conduct**

   - **Honest and Professional Behaviour**: real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must act honestly, professionally, and responsibly in all Company-related

activities and must conduct their real estate business in a manner that maintains trust with clients and protects the reputation of the Company and its brands.

- **Lawful and Ethical Behaviour:** real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must comply with all applicable laws, regulations, and professional standards that apply to real estate services in their jurisdiction and must not engage in any activity that is unlawful, misleading, deceptive, or unethical.
- **Professional Judgment and Care:** Realreal estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must use reasonable skill, care, and judgment when advising clients, handling transactions, and representing properties, and must avoid careless, reckless, or negligent behaviour.
- **Transparency and Truthfulness:** real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must provide clear, accurate, and truthful information in all communications and must not make false promises, exaggerated claims, or misleading statements to clients, prospects, or third parties.
- **Respectful Conduct:** real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must treat clients, colleagues, franchise/market centre partners, and third parties with respect and professionalism and must not engage in abusive, aggressive, intimidating, or inappropriate behaviour.
- **Responsibility for Reputation:** real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must conduct themselves in a way that does not harm, or is likely to harm, the goodwill, reputation, or credibility of the Company or its brands, whether through actions, statements, or omissions.

4. Compliance with Laws and Licensing Requirements

real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must at all times comply with all laws, regulations, rules, and professional standards that apply to real estate services in the jurisdiction where they operate. This includes laws relating to real estate licensing, consumer protection, advertising, fair trading, privacy, anti-discrimination, and financial reporting.

real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must hold and maintain a valid and current real estate licence, registration, or qualification required to lawfully provide real estate services in their jurisdiction. The licence must remain active, in good standing, and free from suspension or restriction at all times while the real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals operates under the Company's brand.

Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must immediately inform the Company in writing, and in any case as soon as they become aware, if their licence is suspended, cancelled, restricted, under investigation, or subject to any disciplinary action by a regulator or professional body. Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must also promptly disclose any criminal charges, regulatory investigations, or legal proceedings, whether pending or threatened, that relate to their professional conduct or may affect their ability to act as a real estate professionals (real estate agents, property manager, property valuer, mortgage broker, insurance broker, real estate broker) and real estate related professionals under the Company's brand. The Company may determine, at its discretion, whether such matters affect the real estate professionals (real estate agents, property manager, property valuer, mortgage broker, insurance broker, real estate broker) and real estate related professionals suitability to continue operating under the Company.

Real estate professionals (real estate agents, property manager, property valuer, mortgage broker, insurance broker, real estate broker) and real estate related professionals are solely responsible for understanding and complying with local legal and licensing requirements and must not rely on the Company for legal or regulatory advice. Any failure to comply with applicable laws or licensing requirements will be treated as a serious breach of this Policy and may result in disciplinary action.

5. Honesty, Fair Dealing, and Client Integrity

- **Honesty and Truthful Dealings:** Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must act honestly in all dealings with clients, prospects, and third parties and must not make false, misleading, exaggerated, or incomplete statements about properties, pricing, market conditions, services, fees, or outcomes.
- **Accurate Information:** Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must ensure that all information shared with clients, including listings, advertisements, representations, and communications, is accurate to the best of their knowledge and must promptly correct any incorrect or outdated information once they become aware of it.

- **Fair Dealing with Clients:** Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must treat all clients fairly and must not take unfair advantage of a client's lack of knowledge, experience, language ability, or personal circumstances.
- **No Misrepresentation or Concealment:** Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must not misrepresent material facts or intentionally withhold information that a reasonable client would consider important when making a decision about a property or transaction.
- **Client Interests and Integrity:** Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must act with integrity when representing clients and must handle client matters in a responsible and professional manner that supports trust and confidence in the real estate process.
- **No Unauthorised Promises:** real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must not make guarantees, assurances, or promises to clients that they are not authorised to make or that cannot reasonably be delivered.

6. Client Representation and Disclosure Obligations

- **Client Representation and Disclosure Obligations:** Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must clearly explain to clients whom they represent in a transaction, valuation, financing, insurance, management activities or any other activities and must not create confusion about their role, responsibilities, or loyalties.
- **Clear Disclosure of Agency Role:** Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must disclose to clients, at the earliest reasonable stage, whether they are acting for the seller, buyer, landlord, tenant, or another party, and must ensure the client understands this relationship.
- **Disclosure of Material Information:** Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must disclose all material facts about a property or transaction or any activity that a reasonable client would consider important when making a decision, even if such disclosure may affect the outcome of the transaction.
- **No Hidden Interests:** Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must disclose any personal, financial, or business interest they have in a property or transaction or any activity before proceeding, including where the real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals, a family member, or an associated party stands to benefit.
- **Client Consent and Instructions:** Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must follow lawful client instructions and must not proceed with any action that goes beyond the authority given by the client or contradicts written or clearly communicated instructions.
- **No Undisclosed Dual Representation:** Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionalsmust not represent multiple parties in the same transaction or any activity without clear disclosure and informed consent from all affected parties, where such dual representation is permitted by law.
- **Record of Disclosures:** Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must keep appropriate records of disclosures, consents, and client instructions in accordance with Company requirements and applicable law.

7. Conflicts of Interest and Personal Transactions

- **Conflicts of Interest and Personal Transactions:** Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must avoid situations where their personal, financial, or business interests conflict, or appear to conflict, with the interests of their clients or the Company.
- **Disclosure of Conflicts:** Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must promptly disclose to the Company and the affected client any actual, potential, or perceived conflict of interest as soon as they become aware of it, and before continuing with the transaction.
- **Personal Interest in Property:** Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must disclose in writing if they, a family member, or any associated person has a direct or indirect interest in a property or transaction or any activity in which the real estate professionals

(real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals is involved, and must not proceed without proper disclosure and any required consent.

- **No Undisclosed Benefits:** Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must not accept or seek any secret commission, referral fee, rebate, gift, or other benefit that could influence, or appear to influence, their professional judgment without full disclosure and approval where required.
- **Personal Transactions:** Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must follow Company rules and applicable law when handling their own property transactions or any activity or those of related parties and must not use confidential information, client data, or Company systems for personal advantage.
- **Priority of Client Interests:** Where a conflict exists, real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must place the client's lawful interests ahead of their own and must step away from the transaction or any activity if the conflict cannot be properly managed or resolved.

8. Confidential Information and Client Data Protection

Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must keep all confidential information and client data strictly private and secure and must use such information only for legitimate Company-related business purposes. Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must not disclose, share, sell, misuse, or access confidential information or client data except where required to perform authorised services or where disclosure is required by law. Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must handle all personal and client data in accordance with applicable privacy and data protection laws and follow Company instructions on data handling, storage, and security. Any misuse, unauthorised access, or failure to protect confidential information or client data will be treated as a serious breach of this Policy.

9. Use of Company Systems, CRM, and Technology

Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must use the Company's systems, CRM, platforms, and technology tools only for authorised business activities connected to the Company and in accordance with Company instructions. Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must not misuse, interfere with, copy, extract, or attempt to access data, leads, or systems for unauthorised purposes, including off-system transactions or personal benefit. Login details and access credentials must be kept secure and must not be shared with any unauthorised person. Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must immediately report any suspected system misuse, data breach, or security issue to the Company. Unauthorised use of Company systems or technology will be treated as a serious breach of this Policy.

10. Brand Representation and Marketing Conduct

Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must represent the Company and its brands in a professional, accurate, and responsible manner at all times. All marketing, advertising, listings, and public communications using the Company's name, branding, logos, or materials must follow Company guidelines and must be truthful, lawful, and not misleading.

Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must not alter, misuse, or create unauthorised versions of Company branding or hold themselves out as having authority beyond what is permitted. Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must not use the Company's brand to promote unrelated businesses, services, or personal ventures.

Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must ensure that all marketing activity, including online content and social media, reflects positively on the Company and does not damage its reputation or goodwill. Any marketing material that the Company considers misleading, non-compliant, or inappropriate must be corrected or removed promptly when requested.

11. Advertising and Social Media Standards

- **Advertising and Social Media Standards:** This section sets out the rules real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage

broker, insurance broker), building service and service professionals must follow when advertising, marketing, or promoting Company-related services in any format or medium.

- **Accuracy and Truthfulness in Advertising:** Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must ensure that all advertising, promotions, listings, and public statements relating to Company business are accurate, lawful, and not misleading. Claims about properties, pricing, market conditions, services, or results must be based on facts and must not create false expectations.
- **Use of Online Platforms:** This Policy applies to content posted on websites, property portals, messaging apps, and social media platforms, including personal accounts, where the content relates to Company business, uses the Company's brand, or promotes services connected to the Company.
- **Professional Online Conduct:** Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must behave professionally when posting, commenting, or engaging online in connection with Company business. Content that is offensive, discriminatory, abusive, defamatory, or likely to harm the Company's reputation must not be posted or shared.
- **No False Authority or Affiliation:** Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must not suggest that they are employees, owners, or decision-makers of the Company, or that they have authority to bind the Company, unless expressly authorised in writing.
- **Removal of Non-Compliant Content:** Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must immediately amend or remove any advertisement, post, or content that the Company reasonably considers misleading, inaccurate, or inconsistent with brand standards once notified, regardless of the platform or account used.

12. Off-System Transactions and Non-Circumvention

Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must conduct all Company-related transactions, valuations, financing, insurance, management activities, any activities, referrals, negotiations, and client dealings strictly through the Company's approved systems, processes, and platforms. Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must not bypass, avoid, or work around the Company to complete deals, accept payments, or engage with Company leads outside the Company's systems for personal or third-party benefit. Any attempt to divert, conceal, or complete Company-related business off-system, whether directly or indirectly, will be treated as a serious breach of this Policy and the applicable contractual agreements.

13. Fees, Payments, and Financial Integrity

Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must deal honestly and transparently in all matters relating to fees, commissions, payments, and financial arrangements connected to Company business. Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must follow the Company's approved fee structures, commission arrangements, invoicing processes, and payment timelines as set out in their applicable agreements and Company policies.

Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must not collect, retain, divert, or misuse any funds, deposits, commissions, or payments that are intended for the Company or a client, except where expressly permitted. All financial records, statements, and transaction details provided to the Company must be accurate, complete, and not misleading.

Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must not engage in any form of financial misconduct, including secret commissions, undisclosed referral fees, kickbacks, false invoicing, or manipulation of transaction values or records. Any attempt to conceal financial activity, misrepresent payments, or gain financial advantage through improper means will be treated as a serious breach of this Policy and may result in disciplinary action.

14. Anti-Money Laundering and Financial Crime Compliance

Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must act with a high level of caution and integrity when dealing with client funds, payment sources, and transaction structures and must not prioritise speed, commission, or client pressure over compliance.

Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must not proceed with any transaction where required identification, source-of-funds information, or verification documents are missing, delayed, resisted, inconsistent, or appear unreliable, even if the client insists or threatens to walk away. Pressure from a client, referral partner, or third party is not a valid reason to continue.

Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must not ignore warning signs or red flags, including unusual payment methods, complex ownership structures without clear explanation, last-minute changes to parties or payment details, requests to split payments, use of unrelated third parties, or reluctance to provide clear information.

Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must not rely on lawyers, accountants, family members, or other intermediaries to distance themselves from compliance responsibilities. Where a transaction, valuation, financing, insurance, management activities or any activities appears unusual or high-risk, real estate professional (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must raise concerns and must not proceed until appropriate checks are completed.

Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must not assist, facilitate, disguise, or turn a blind eye to any activity that may involve illegal funds, financial crime, or attempts to conceal the true source of money. Any suspicion, concern, or uncertainty must be treated seriously and reported in line with Company instructions and applicable law.

Any attempt to bypass safeguards, continue despite red flags, or deliberately avoid asking questions in order to complete a transaction will be treated as a serious breach of this Policy.

15. Professional Behaviour and Respectful Conduct

- **Professional Behaviour and Respectful Conduct:** Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must behave appropriately and respectfully in all interactions connected to Company business, including dealings with clients, prospective clients, colleagues, franchise/market centre partners, service providers, regulators, and members of the public.
- **Respectful Interaction:** Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must treat others with courtesy and professionalism and must not engage in rude, aggressive, intimidating, threatening, or disrespectful behaviour, whether in person, in writing, or online.
- **No Harassment or Discrimination:** Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must not engage in harassment, bullying, discrimination, or offensive conduct of any kind. This applies to verbal, written, physical, and digital conduct and includes behaviour based on race, religion, gender, age, disability, sexual orientation, nationality, or any other protected characteristic.
- **Professional Communication:** Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must communicate in a clear, calm, and professional manner in all emails, messages, calls, meetings, and online interactions connected to Company business and must avoid abusive language, personal attacks, or inappropriate remarks.
- **Conduct During Business Activities:** Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must act responsibly during property viewings, negotiations, meetings, events, and any other Company-related activities and must not behave in a way that causes discomfort, fear, or harm to others.
- **No Retaliation:** Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must not retaliate against any person who raises a concern, makes a complaint, or reports misconduct in good faith, whether internally or to a regulator.

16. Prohibited Conduct

- **Prohibited Conduct:** Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must not engage in any conduct that is dishonest, unethical, unlawful, or inconsistent with this Policy, the Company's standards, or applicable agreements.
- **Scope of Prohibited Conduct:** Prohibited conduct includes actions taken personally or through another person, intermediary, associated business, assistant, or third party. It also includes any attempt to engage in such conduct, as well as assisting, encouraging, or facilitating others to do so, whether or not the conduct is ultimately completed.
- **Misuse of Company Resources:** Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must not misuse, abuse, extract, copy, exploit, or improperly access the Company's systems, CRM, branding, marketing materials, data, leads, or confidential information for unauthorised purposes or personal benefit.

- **False or Misleading Behaviour:** Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must not provide false or incomplete information, conceal material facts, falsify records, manipulate data, or engage in any form of misrepresentation in connection with Company business.
- **Financial Misconduct:** Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must not engage in theft, fraud, secret commissions, kickbacks, undisclosed referral fees, improper payments, false invoicing, or any other form of financial dishonesty.
- **Circumvention and Unauthorised Dealings:** Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must not bypass the Company's systems, controls, or processes to divert leads, complete transactions off-system, conceal dealings, or carry out Company-related business outside approved channels.
- **Abuse, Threats, or Intimidation:** Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must not engage in abusive, threatening, coercive, harassing, or intimidating behaviour toward clients, colleagues, franchise/market centre partners, service providers, regulators, or any other person connected to Company business.
- **Unlawful or High-Risk Conduct:** Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must not engage in any conduct that exposes, or is likely to expose, the Company to legal, regulatory, financial, or reputational risk, including conduct that may reasonably be viewed as reckless, deceptive, exploitative, or improper.
- **Failure to Cooperate:** Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must not obstruct, interfere with, delay, or refuse to cooperate with any internal review, investigation, audit, or compliance request made by the Company.
- **Retaliation or Victimisation:** Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must not retaliate against, threaten, penalise, or disadvantage any person who raises a concern, submits a complaint, or reports misconduct in good faith.
- **Improper Use of Authority:** Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must not present themselves as having authority, ownership, decision-making power, or approval rights on behalf of the Company beyond what is expressly authorised.
- **Ongoing Application:** These prohibitions apply at all times while an real estate professional (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals is engaged with the Company and continue to apply during any notice period, suspension, investigation, or transition period.

17. Reporting Misconduct and Duty to Cooperate

Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must promptly report any suspected or actual misconduct, breach of this Policy, breach of applicable agreements, or unlawful or unethical behaviour connected to Company business. Reports must be made as soon as the real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals becomes aware of the issue and must not be delayed in the hope that the issue will resolve itself.

- **How to Report:** Reports must be made to the Company by email at onboarding@groundfloor24.com or through any other reporting channel formally notified by the Company from time to time. Informal reporting or raising concerns only verbally does not replace the obligation to report through an approved channel.
- **Good Faith Reporting:** Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must raise concerns honestly and in good faith and must not make knowingly false, malicious, or misleading reports. An real estate professional (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals will not be penalised for reporting concerns genuinely, even if an investigation later finds no breach.
- **Duty to Cooperate:** Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must fully cooperate with any internal review, investigation, audit, or compliance process conducted by or on behalf of the Company. This includes providing accurate information, responding to reasonable requests, preserving records, and participating in interviews where required.
- **No Obstruction or Interference:** Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must not obstruct, interfere with, delay, conceal information from, or attempt to influence any investigation, review, or compliance process.

- **No Retaliation:** Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must not retaliate against, threaten, intimidate, or disadvantage any person who raises a concern, submits a complaint, or participates in an investigation in good faith.
- **Ongoing Obligation:** The duty to report misconduct and to cooperate with investigations continues during any notice period, suspension, or transition period and applies even after access to Company systems or branding has been restricted.

18. Disciplinary Action and Consequences of Breach

Any breach of this Policy will be taken seriously by the Company and may result in disciplinary action. The type and severity of action taken will depend on the nature, seriousness, and circumstances of the breach.

- **Types of Disciplinary Action:** Disciplinary action may include, without limitation, a written warning, mandatory corrective action, suspension or restriction of access to Company systems, CRM, branding, or leads, temporary or permanent removal from certain activities, or termination of the real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals engagement with the Company.
- **Immediate Action:** The Company may take immediate disciplinary action, including suspension or restriction of access, where it reasonably believes that an real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals conduct poses a legal, financial, compliance, or reputational risk, or where an investigation is required.
- **No Requirement of Prior Warning:** The Company is not required to provide a warning or opportunity to correct conduct before taking disciplinary action where the breach is serious or where immediate action is considered necessary.
- **Contractual and Legal Rights:** Disciplinary action under this Policy is in addition to, and does not limit, any rights or remedies available to the Company under applicable agreements or law, including the right to terminate, seek damages, or report matters to regulatory or law enforcement authorities.
- **No Limitation on Investigation:** The Company may investigate suspected breaches of this Policy at any time and may continue or commence disciplinary action even after access to systems or branding has been restricted or the real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals engagement has ended.

19. Right to interpret

The Company retains the right to interpret and apply this Policy in good faith and its reasonable interpretation will prevail in the event of ambiguity.

20. Headings

Headings are included for convenience only and do not affect the interpretation or meaning of this Policy.

21. Severability

If any provision of this Policy is found to be invalid or unenforceable, that provision will be limited, removed, or replaced only to the extent necessary to make it valid and enforceable. The remaining provisions of this Policy will continue in full force and effect, and any replacement provision will reflect the original intent of the affected provision as closely as permitted by law.

22. Binding

This Policy binds the real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals successors, permitted assigns, and any person or entity acting on the real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals behalf in connection with Company business. This Policy is binding on the Company and its successors and permitted assigns.

23. Assignment

The real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals must not assign, transfer, or delegate any rights or obligations under this Policy to any other person or entity. The Company may assign or transfer this Policy as part of a business transfer, restructuring, or change in ownership.

24. Waiver

Any waiver by the Company of a breach of this Policy is effective only if given in writing. A waiver applies only to the specific situation for which it is granted and does not prevent the Company from enforcing this Policy in any other or future situation. A failure or delay by the Company to enforce any right under this Policy does not operate as a waiver of that right or any other rights.

25. Entire Agreement

This Policy forms part of the framework governing the real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building

service and service professionals conduct when operating under or in association with the Company. It should be read together with the real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals Independent Contractor Agreement and any other applicable agreements, policies, or guidelines issued by the Company. In the event of any inconsistency, the applicable agreement or the Company's contractual rights will prevail unless the Company states otherwise in writing.

26. Language Versions

This Agreement is prepared in the English language and may be translated into one or more additional languages for convenience. In the event of any inconsistency, discrepancy, or conflict between the English version and any translated version, the English version shall prevail and be the sole language governing the interpretation and enforcement of this Agreement. The real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals confirms that they understand the English version sufficiently to comprehend the terms of this Agreement and acknowledges that any translation shall not affect the meaning, validity, or enforceability of the English version.

27. Survival of Obligations

Obligations under this Policy that by their nature are intended to continue, including confidentiality, cooperation, and conduct-related obligations, continue to apply during any notice period and after termination of the real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals engagement to the extent permitted by law.

28. Updates and Changes

The Company may update, revise, or replace this Policy from time to time to reflect changes in law, business practices, or operational requirements. Updated versions will be shared through the Company's official communication channels, and real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals are responsible for reviewing them. Continued use of the Company's systems, branding, CRM, platforms, or client leads after an update takes effect confirms the real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals acceptance of and agreement to comply with the revised Policy.

29. Acknowledgement

Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals confirm that they have received, read, and understood this Code of Conduct Policy and agree to comply with it as a condition of operating under or in association with the Company and its brands. By continuing to use the Company's systems, CRM, platforms, branding, marketing materials, or client leads, real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals acknowledge and accept that this Policy is binding on them and that failure to comply may result in disciplinary action in accordance with this Policy, applicable agreements, and law.

ACCEPTANCE:

I confirm that I have read, understood, and agree to comply with this Code of Conduct Policy.

Real estate professionals (real estate agents, property manager, property valuer, real estate broker), real estate related professionals (mortgage broker, insurance broker), building service and service professionals

Name: _____

Address: _____

Email: _____

Date: _____

Signature: _____