nib

Code of Conduct

Contents

1. Message from the Chief Executive Officer and Managing Director 2

2. Scope 3

3. Code Rules 3

3.1. Do not discriminate 3

3.2. Privacy, Data Protection and Artificial Intelligence 3

3.3. Confidentiality 3

3.4. Deal fairly 4

3.5. Conduct business in an ethical manner 4

3.6. Competition and Anti-Trust Laws 4

3.7. Conflicts of interest 4

3.8. Business Expenses 5

3.9. Protect assets and property and use them properly 5

3.10. Health, safety and wellbeing 5

3.11. Environment 5

3.12. Drugs and alcohol 5

3.13. Media, publicity and social media 6

3.14. Comply with laws and regulations 6

3.15. Responsibility to shareholders and approach to disclosure and financial reporting 6

3.16. Insider Trading 6

3.17. Protect the reporting of wrongdoing 6

4. Breach of Code 7

5. Additional Information 7

1. Message from the Chief Executive Officer and Managing Director

At nib, we're committed to fostering a respectful, inclusive, and collaborative environment for everyone. Our Code of Conduct helps guide how we work together.

We're also guided by our nib Group values. These values are the foundation of how we behave and interact with each other, our members, travellers, participants, suppliers, shareholders, and other stakeholders. When viewed together, the following nib Group values are intended to reflect the priorities of the business and provide guidance in decision making.

- We before me
- Free to be you
- Customers at the core
- We're here for good reason
- Challenge the status quo
- Own it together

Our nib Playbook provides further information on our values, purpose, vision, mission, strategy and life at nib.

nib's Code of Conduct, Ethics Framework and other policies have been developed to ensure that we observe the highest standards of fair dealing, honesty and integrity in our business activities.

nib's Board of Directors believe that our commitment to this Code will maintain the confidence of the Group among all stakeholders. We've also reinforced our commitment to operating sustainably across our supply chain through the development of our Supplier Code of Conduct which sets out the commitments and principles we expect of all our supply chain partners.

It is essential you are familiar with the Code and always act in accordance with these rules. Policies referred to within the Code are available to view on nib's Corporate Governance webpage. Additionally, employees are required to comply with nib's company policies and procedures relevant to their role and location(s) of employment available on nib's Policy Centre intranet.

Beyond this Code, there is an expectation that everyone at nib abides by all laws and conducts themselves in a manner that is of the highest ethical and moral standards in all dealings when acting for or on behalf of nib. We all have a role to play in protecting the reputation and performance of our company.Under the Code, we are all responsible for reporting on behaviour or conduct that does not meet these standards.

Please read the Code carefully If you require further information, assistance, or are uncertain about the application of this Code, please discuss with your Manager or contact the Company Secretary at companysecretary@nib.com.au

Ed Close
Chief Executive Officer and Managing Director

2. Scope

This Code applies to Directors, employees, contractors and authorised third-party representatives within nib holdings limited and all wholly owned entities within the nib Group (“the nib Group”) or (“nib”).

nib Group related entities may adopt business specific Codes and policies to support compliance with applicable operations, regulatory and/or employment obligations.

3. Code Rules

3.1. Do not discriminate

nib is committed to providing a diverse, inclusive and psychological safe work environment where everyone is treated fairly and with respect.

nib has zero tolerance for discrimination, harassment, sexual harassment, bullying, victimization or vilification in the workplace. This includes discrimination on the basis of gender, race, nationality, religion, colour, language, marital or family status, gender identity, sexual orientation, transgender status, intersex status, age, compulsory retirement, disability, personal associations, political beliefs, carer’s or family responsibilities, pregnancy, breastfeeding, membership, or non-membership of a trade union, or having been subjected to family violence.

Applicants for employment must be evaluated on merit in accordance with their skills, qualifications, and abilities.

Employees can refer to nib’s Diversity, Equity and Inclusion Policy, Anti-Discrimination and Equal Employment Opportunity Policy and Sexual Harassment Policy for further information.

3.2. Privacy, Data Protection and Artificial Intelligence

The privacy of personal information held or entrusted to nib by clients, members, suppliers, employees and others must be respected and maintained at all times.

All personal information about nib’s suppliers, members and employees is to be treated as confidential. Employees are required to use and manage personal information held by nib in accordance with privacy laws and regulations in the locations in which nib does business and in accordance with nib’s Privacy Policy.

nib is committed to the protection and safeguarding of all data as demonstrated in our Information Security Policy and Data Protection Policy. nib’s Data Governance Framework outlines how we govern data assets effectively and responsibly including the appropriate use of technology such as artificial intelligence as covered in our AI Policy.

3.3. Confidentiality

Great care must always be taken to ensure the integrity and security of nib’s confidential information.

Confidential information is not available to the public and relates to the affairs of the business, employees, clients, members, and suppliers. It may include nib’s business strategies, marketing and sales plans, competitive analysis, financial plans and forecasts, member or employee information and supplier information and pricing.

This information must remain confidential at all times, even after you cease employment with nib.

You must not access, request, make improper use of, transfer or disclose confidential information to anyone, except those who are authorised legally or by position. If confidential information inadvertently comes into your possession, it must be returned immediately. Employees can refer to nib’s Information Classification and Handling Policy for further information.

If you are required by an authority to provide confidential information that has not been authorised, you must notify riskandcompliance@nib.com.au

3.4. Deal fairly

All suppliers, competitors, clients, members, providers, and other stakeholders, as well as each employee, must be treated fairly and with respect.

In line with nib's Procurement Policy, decisions regarding suppliers and contractors must also be made on merit and a commercial basis. nib must collect information about competitors and other stakeholders in a lawful manner.

3.5. Conduct business in an ethical manner

Our culture and values are sustained by ethical business practices, responsible decision making and good governance throughout the organisation. When making decisions that impact our stakeholders, you should always ask yourself "should we" rather than "can we".

nib's Ethics Framework provides a guide for employees when making decisions across the organisation to ensure outcomes align with our purpose, values, and ethical principles.

Under no circumstances can you offer or accept secret commissions or bribes to further business interests.

In line with nib's Anti-Bribery Policy, it is generally advisable not to accept or give gifts or entertainment that could create or appear to create an obligation, conflict of interest, affect your impartiality or influence a business decision.

You are also obliged to avoid financial, business and other relationships that may conflict with the interests of nib. Refer to the below 'Conflicts of interests' section.

For more information, nib's Anti-Bribery Policy and Supplier Code of Conduct sets out our commitment to conducting business in an ethical and honest manner.

3.6. Competition and Anti-Trust Laws

nib is committed to complying with the Australian Competition and Consumer Act 2010, the New Zealand Commerce Act 1986 and relevant competition and anti-trust laws in all countries in which we conduct business.

Competition and consumer law requirements regulate fair trading, competition, and consumer protection. nib promotes a cooperative relationship with the Australian Competition and Consumer Commission, New Zealand Commerce Commission, and other relevant regulatory agencies.

nib is also committed to trading independently from competitors and acting fairly and honestly in dealings with suppliers and members. Employees can refer to nib's Competition and Consumer Law Policy for further information.

3.7. Conflicts of interest

Conflicts of interest should be avoided and if they occur, should be disclosed. A conflict of interest may arise where you have a personal or commercial interest that may interfere, or appear to interfere, with the interests of nib.

For example, if you or your family has a personal or commercial interest that could influence the performance of your role, your loyalties could be divided and your position with nib compromised.

You should not participate in decisions and activities that may conflict with your duties and responsibilities to nib.

nib must provide approval before you accept any position with another company, business or organisation as a director, agent, employee, or consultant, whether paid or unpaid, which may, or may be seen, to be a conflict of interest.

In line with nib's Conflicts of Interest Policy, if you are aware of a conflict or a possible conflict, it is important that you complete the Conflict of Interest Declaration and provide to the Company Secretary as soon as possible. In doing so, you will need to provide specific details regarding the subject matter and the potential or actual conflict of interest.

3.8. Business Expenses

Employees are required to do the right thing by nib when incurring business related expenditure.

All expenses must be within an employee's delegated authority, documented and reported in a timely manner and in accordance with the policies and procedures relevant to their location/s of employment. For more information, refer to nib's Business Expense and Travel Policy.

3.9. Protect assets and property and use them properly

nib's assets and property (or the property of relevant landlord's) must only be used for legitimate business purposes or approved arrangements. These assets extend to all resources and include funds, plant and equipment, stock and merchandise, intellectual property, software, records, and other company information.

In line with nib's Acceptable Use of IT Policy, nib's electronic communications resources are to be used to communicate effectively and efficiently, without abuse.

nib's electronic communications should not be used to harass, discriminate, or offend other employees, stakeholders or the general public. Any inappropriate material received through nib's electronic communications resources should be deleted or destroyed immediately. The use of nib computers and telephones for private purposes is permitted, provided it is in an efficient and prudent manner.

3.10. Health, safety and wellbeing

We are committed to maintaining high standards of organisational health and safety for our employees, members, participants, visitors and contractors.

To support this we develop, communicate, implement, and maintain policies and systems for work health and safety that are consistent with recognised standards. In doing so, we take into account evolving community expectations, management practices, technological and scientific knowledge to improve our work health and safety performance.

nib's Hybrid Work Policy outlines our approach to hybrid working, including location principles and support to ensure employees are able to work remotely in a safe and effective manner.

nib manages risk by implementing management systems that identify, assess, monitor, and control hazards. For more information, please refer to nib's Health, Safety and Wellbeing Statement.

3.11. Environment

nib cares for the environment and cultural heritage. In doing so, we comply with all relevant environmental laws, regulations and standards.

Where such laws do not adequately protect the environment, standards are developed by nib to minimise any adverse environmental impacts resulting from our operations, products, and services.

nib communicates with the community and government on environmental issues and where appropriate contributes to the development of environmental policies and regulations. nib has environmental management systems to identify, control and monitor environmental risks.

Further information on nib's Sustainability can be found on our website.

3.12. Drugs and alcohol

In line with nib's Drug and Alcohol Policy, you have an obligation to behave responsibly and in line with company policies with respect to the use of alcohol and drugs in the workplace, at an nib event and when conducting nib business.

3.13. Media, publicity and social media

Only authorised employees are permitted to make public statements or give interviews on behalf of and in regard to nib to a media representative (whether radio, television, web or press) or comment via social media channels, online blogs and forums.

Unless authorised, photographers, videographers or any other media representative are not allowed to access nib premises to record business activities.

You must not directly or indirectly engage in any activity that could by association cause nib public embarrassment or bring discredit on it in any way. This includes making negative statements about nib via any social media channel.

For further information please refer to nib's Media and Social Media Policy or contact nib's Media Relations (media@nib.com.au).

3.14. Comply with laws and regulations

You must always comply with laws and regulations, including those relating to nib, as well as the technical and ethical requirements of any relevant regulatory or professional body.

Those found to have breached any law or regulation may face legal or disciplinary action, including termination. Ignorance of the law or a good intention does not excuse your obligation to comply.

All actual or potential breaches must be reported immediately to your Manager and in accordance with nib's Incident Management Procedure.

If you are uncertain about the interpretation of any applicable law, regulation or requirement, contact riskandcompliance@nib.com.au

3.15. Responsibility to shareholders and approach to disclosure and financial reporting

nib is committed to:

- providing value to shareholders, while complying with all legislative and regulatory requirements;
    - providing timely, balanced and readily available material information to shareholders, regulators, other key stakeholders, and the investing community generally; and
- open and transparent communication with its shareholders and stakeholders.

nib's Disclosure and Communications Policy and Disclosure and Materiality Guidelines provide an outline of our requirements regarding the timely provision of information to shareholders and other stakeholders, including posting information to its website. Processes have also been established to ensure that the accounts and financial information provided by nib represent a true and fair view of the financial performance and position of the company.

nib personnel must also fully cooperate with and not make any false or misleading statement to or conceal any relevant information from nib's auditors.

3.16. Insider Trading

Insider trading is a serious offence under the Corporations Act 2001 (Cth). Insider trading laws prohibit a person in possession of material non-public information relating to a company from dealing in any way in that company's securities.

You and other persons, such as family members or business associates, are prohibited from engaging in insider trading. You must not deal in, or encourage other persons to deal in, nib's securities based on inside information.

nib's Trading Policy provides guidelines to ensure that you do not deliberately or inadvertently breach the insider trading laws or nib's policy.

3.17. Protect the reporting of wrongdoing

You are encouraged to report any actual or suspected fraudulent or unethical behaviour, breaches of this Code or nib's policies.

nib's Whistleblower Policy provides more information and has been put in place to ensure employees and other Disclosers can raise concerns regarding any misconduct or improper state of affair or circumstances (including unethical, illegal, corrupt, or other inappropriate conduct) without being subject to victimisation, harassment, or discriminatory treatment.

4. Breach of Code

The values and policies in this Code are not comprehensive. This Code is designed to focus on particular values identified by nib that are central to the organisation's integrity.

The highest standards of corporate conduct are critical to our success and image. You are encouraged to report any suspected breach of this Code to your Manager or any contact nominated within nib's Whistleblower Policy.

nib's Whistleblower Policy provides more information on how employees and other Disclosers can raise concerns regarding any misconduct or improper state of affair or circumstances (including unethical, illegal, corrupt, or other inappropriate conduct)

Suspected breaches of this Code will be investigated. Those found to have breached this Code may face legal or disciplinary action, including termination of employment.

5. Additional Information

5.1 Where can I obtain further information?

nib's Group Executive – Legal and Chief Risk Officer/Company Secretary is responsible for the administration of this Code.

If you require further information, assistance, or are uncertain about the application of this Code, please discuss with your Manager or contact companysecretary@nib.com.au

5.2 Review and publication of this Code

The Board will review this Code annually. This Code may be amended by resolution of the Board.

A copy of this Code will be distributed to the Board and all employees and will be available at nib.com.au

Adopted by the Board with effect on 30 July 2025.

nib

nib.com.au