REA Group

# Code of Conduct

Effective 13 November 2026



Changing the way the world experiences property

# Overview – A Message from our CEO

The strength of REA Group lies in our people and the relationships we foster. The way we conduct ourselves – with colleagues, customers and the community – is a shared responsibility that shapes our brand and our success.

Our Code of Conduct formalises this commitment. It sets out professional standards of behaviour for all REA Group employees in all our interactions. It's fundamental to our culture and provides an important bridge between our values, policies and legal requirements. This includes our commitment to the Respect@Work legislation, which emphasises proactive and preventative approaches to workplace behaviour, and our commitment to compliance with Australia's *Competition and Consumer Act*.



Although Respect@Work is designed for Australian businesses, its principles and this policy apply equally across all jurisdictions in which REA Group operates.

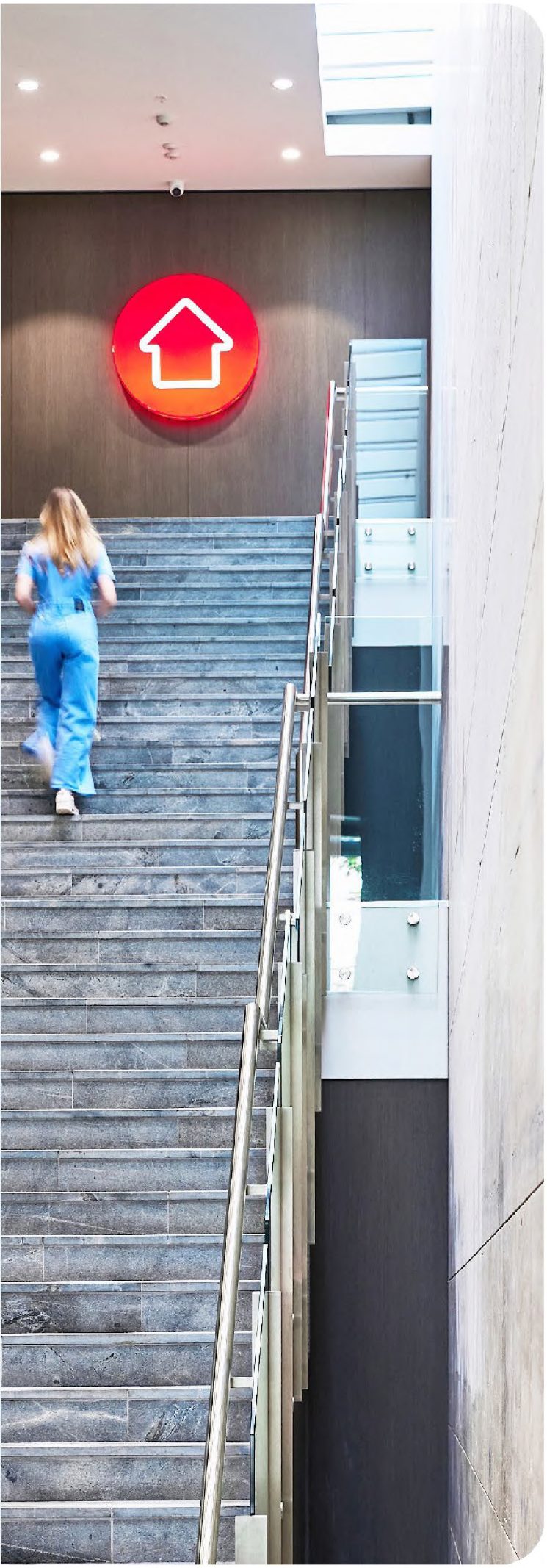
Similarly, our commitment to compliance with competition and anti-trust laws extends to the laws of all countries that are applicable to our business.

I ask that you treat this Code as a living document. Read it carefully, refer to it often and ensure you are familiar with the supporting policies on Confluence.

By holding ourselves and each other accountable to these standards, we ensure REA Group is not only a successful business but a community build on respect and integrity.



**Cam McIntyre**
Chief Executive Officer
**REA Group**





# Purpose & Scope

The Code of Conduct outlines REA Group's expectations for behaviour on a day-to-day basis, it is a guide for how we interact and work with each other, our customers, our shareholders, the business and our community. It is expected that everyone reads and acts in line with the Code of Conduct: we are all personally accountable for behaving in a way that is professional, lawful and in line with our values and policies.

## Who does this policy apply to?

This policy applies to all REA Group directors, employees, contractors, consultants, and visitors working for the REA Group ('REA') in any of our business and in any of our offices around the world.

## When does this policy apply?

This policy applies to everyone who works at REA Group whether:

- in the workplace, including when working outside normal working hours
- during work activities, including when working remotely, interstate or overseas
- at work-related events, including conferences and social functions.

# Purpose & Scope

## What are the professional standards of behaviour we expect?

The Code of Conduct acts as a bridge between our values, and our policies and legal requirements.

Our values guide how we work, and ensure our competitive advantage through enabling each of our employees to bring their best creative and passionate selves to work:




Our policies ensure consistency in how we do business and guide us to act lawfully. In addition to reading this Code of Conduct, please ensure that you read and are familiar with REA's company policies, including those relevant to the Respect@Work legislation.

Our Code of Conduct guides how we behave, fostering cooperation, ethical and appropriate decision-making, and aligning our behaviour with expected professional norms. **We expect that everyone will follow these minimum standards.**



## We treat each other respectfully, courteously and with dignity

- Everyone is entitled to be treated fairly and with respect as a person, regardless of role or individual differences.
- We value our people and their personal commitment to delivering quality products and services.
- We encourage cooperation, learning and growth in all who work with us.
- We strive to understand and respond to the needs of our customers and other stakeholders.
- We do not act in a manner that may cause offence to others.
- We seek to foster a respectful and inclusive environment for everyone. This means that clothing and other accessories should avoid slogans, images or symbols that could be considered offensive, political or divisive.
- We act against bullying, harassment, and victimisation caused by unlawful behaviour and uphold the principles of the Respect@Work legislation.

## We are fair, upfront and honest in our dealings

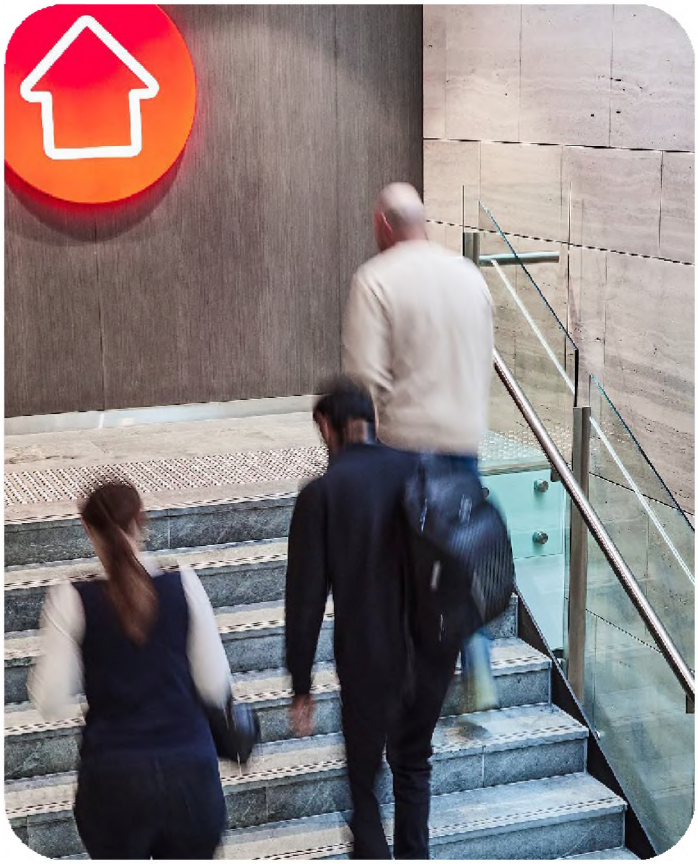
We are fair and honest – we do not use coercive or misleading practices and we do not act in any way that could be considered fraudulent or corrupt. REA considers "fraud" to include (but is not limited to): forgery; misappropriating funds; falsifying financial records or documents; and/or any other dishonest or deceptive act intended to result in financial or personal gain.

We do not place ourselves in situations in which our private interests could conflict directly or indirectly with our obligations to REA.

We disclose to our People Leader any close personal relationship that we may have with another REA staff member or an actual or potential customer or supplier of REA where it may cause a conflict of interest. Examples may include but are not limited to direct reporting lines, conflicts in roles and responsibilities, ELT and another REA staff member/contractor/director, or a supplier/customer relationship where we have involvement around the contractual terms with that supplier. A close personal relationship would generally refer to a spouse, partner, dependent and any person living in the same dwelling as us.

We do not act in ways which may cause others to question our loyalty to REA.

We treat others in the workplace fairly and with respect, and do not harass, victimise or discriminate against team members, customers or others in work practices or the provision of services on the grounds of sex (including pregnancy), sexuality, transgender status, race, colour, ethnic or ethno-religious background, descent or national identity, disability, age, political conviction or religious belief, carers' responsibilities, irrelevant criminal or medical records or other grounds covered by relevant legislation, including the Respect@Work legislation.



## We use REA Group property responsibly and in the best interests of the company and its reputation.

- We use REA property only for the company's business purposes.
- We treat REA property respectfully and maintain it in good working order.
- We ensure REA property is not exposed to situations where theft or damage may occur.

## We use Company Information appropriately, confidentially and in a legal manner

- We do not reveal to any person or company, documents, trade secrets or confidential information concerning the organisation, business finances or affairs of REA or its clients.
- We keep with complete secrecy all confidential information entrusted to us and must not use or attempt to use any such information in a manner which may injure or cause loss either directly or indirectly to REA or its clients.
- We do not use confidential information for personal gain in any form. This includes wagering, betting, participating in prediction markets, or entering into any other transaction or arrangement that involves using information that is not publicly available. This prohibition applies even where such conduct may not constitute a specific legal offence under Australian law.
- We refer all statements, public comments or media enquiries regarding REA to the Corporate Affairs and Communications team.

## We are responsible for our actions and accountable for their consequences

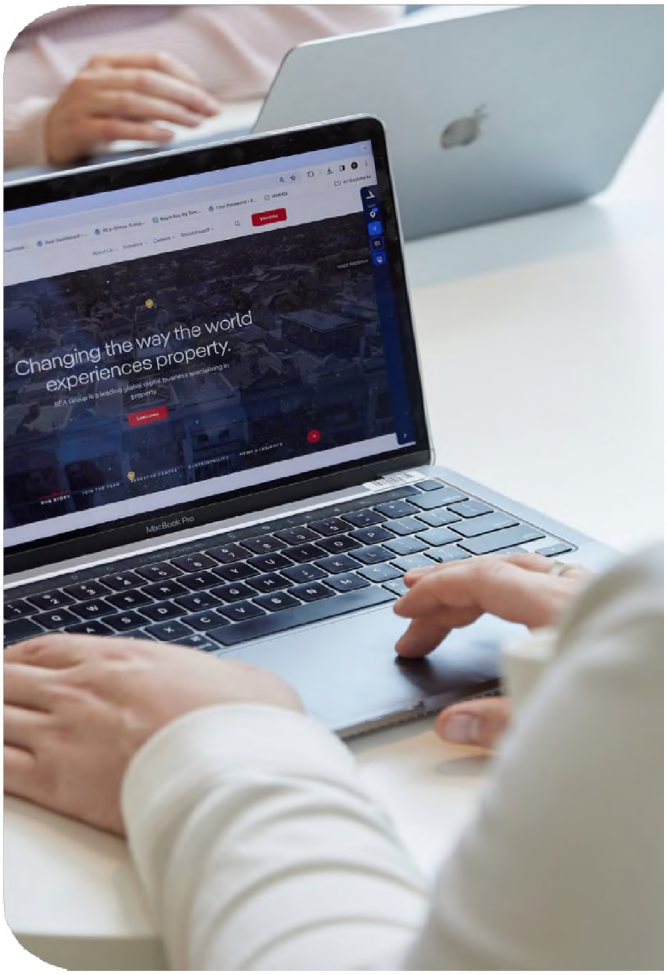
We take personal responsibility for all issues over which we have control and the manner in which these are achieved.

## We respect the law and act accordingly

- We respect and abide by the laws that govern us.
- We will not engage in any conduct which could breach laws regarding corruption, bribery, or money laundering (domestic and foreign).
- We are committed to compliance with competition laws of all countries that are applicable to our business including the *Competition and Consumer Act* in Australia.
- We maintain a safe work environment, adhering to the principles of the Respect@ Work legislation to ensure a workplace free from sexual harassment and discriminatory behaviour. This includes implementation of specific training, communication, measurement and reporting related to the Respect@work legislation.

## We respect and adhere to the REA Values

We take a 'values based' approach to how we work.



# If you're unsure, speak up!

The consequences of breaching this Code of Conduct may include disciplinary action, up to and including termination of employment and in some instances, criminal prosecution, so it's essential that you 'speak up' and seek clarification with an appropriate person if you ever have a question or are seeking further clarification.

People you can talk to in confidence include your People Leader, an Executive Leadership Team Member, Legal, HR Business Partners and Advisors, Risk, and People Services.

We want you to feel like you can raise questions or concerns without fear of intimidation, reprisals or victimisation, and our Whistleblower Policy provides guidance in this regard including how to lodge a complaint or raise an issue. Issues can be reported anonymously and there are strict laws in place that provide protection for whistleblowers.

Where a potential breach is raised, the relevant specialist team will assess, investigate (where required), and apply consequences to any conduct that does not meet the standards expected of our people.



## Related Policies, Procedures & Guidelines

(to be read in conjunction with this Policy):

- The REA Values
- Managing Performance at REA
- Sexual Harassment Policy (including relevant POSH policies in REAI and REA Cyber City)
- Competing and Doing Business Fairly Policy
- Equality in Employment Policy
- Whistleblower Policy
- Avoiding Conflicts of Interest Policy
- Information Handling Policy

## Key Standards & Other Documents

This document has a close relationship with the following:

**Related REA Materials**

- REA Group Policies
- Performance at REA



REA Group