

Code of Conduct

Why have a code of conduct?

It is good practice to set out the ethical and behavioural standards expected of the staff and directors of Trade Me Group Ltd ("Trade Me"). The Code of Conduct does not provide a comprehensive list of what is (and is not) acceptable ethical behaviour, but rather provides general guidance on how we do business and make decisions at Trade Me.

Being professional

When representing Trade Me we will act professionally and not do anything to damage Trade Me's reputation.

Conflicts of interest

We will ensure our individual interests do not interfere (or appear to interfere) with Trade Me's interests. We will not have undisclosed business or personal relationships or accept gifts that could taint the independence of decisions we make on behalf of Trade Me. We will not accept bribes or other inducements.

Fair dealing

We will deal honestly and fairly with Trade Me members, shareholders, competitors, and all other stakeholders.

Use of assets and property

We will protect Trade Me's assets and property from loss, damage, and theft. We will not misuse it, including for personal gain.

Use of company information

We will only use information gained during our relationship with Trade Me in the best interests of the company. We will not misuse it, including for personal gain. We will protect confidential information entrusted to us.

Compliance with the law

We will act honestly and in good faith, and comply with all applicable laws.

Market disclosure

As a listed company on the NZX and the ASX, we understand our responsibilities to the financial community around continuous disclosure. We have Market Disclosure and Securities Trading policies in place.

Reporting a breach / Whistle blowing

A person who becomes aware of a suspected breach of the Code of Conduct should report it to their manager or a member of the Executive Team, or email conduct@trademe.co.nz. Emails sent to this address will only be opened by the CEO and Head of Human Resources.

Alternatively, a person can report the suspected breach to the Chair of the Audit and Risk Management Committee, Joanna Perry, by emailing ARCchair@trademe.co.nz. Emails sent to this address will only be opened by this person.

No action will be taken against a person reporting a suspected breach and their name will remain confidential.

Accountability

A failure to meet the standards set out in this Code of Conduct may result in disciplinary procedures, and could lead to suspension or dismissal.

The Trade Me values

The Trade Me values are an integral part of the Code of Conduct. They sum up what is important to us, and what we aim to be. They are:

1. Deliver awesome online experiences

Our products and services are focused on consumers and design-led. As well as delivering awesomeness, we also aim to build things that are simple to use, reliable and genuinely add value to our community.

2. Be entrepreneurial

We are always innovating, and we like doing things fast. We value optimism, and we look for opportunities in change. We're not afraid to try things and fail, as we're more concerned with learning than dishing out blame.

3. Care about our community

We care about our members, our clients, our shareholders, and our staff. We are willing to empathise, listen, and engage in conversations (but not smother them). We are a good citizen, and committed to making meaningful contributions where we can. We like to help.

4. Be trusted & straight up

We rely on being a trusted place for people to visit online. We must remain authentic, honest, and always front up to explain our position in a non-robotic way. Inside the business, we trust our staff and we encourage them to share their thoughts early.

5. Decide & act on merit

We have a healthy disregard for hierarchy in our decision-making. We prefer to rely on data and good judgment: we measure everything. We value fearlessness and fairness in representing a point of view.

6. Hire & grow great people

We work hard to hire the right people. We value energy, optimism, flexibility, creativity, and a non-serious streak. We're informal but focussed, and much more interested in ideas and execution than the clothes people wear. We celebrate together when we do well.

7. Don't be a dick

This means what it says. It's all about treating people with respect, being responsible and keeping a sense of humour.

More information

If you have any questions or require further information, please email conduct@trademe.co.nz

This code of conduct will be reviewed annually by the Board. Latest update: 1 November 2012.