

Code of Ethics

FIRMA Foreign Exchange Corporation New Zealand Ltd. (“FIRMA NZ”) has a mission *to be the best choice for foreign exchange currency solutions by ensuring the highest level of security while delivering outstanding service and value through individualized relationships. Our growth will be achieved through the expertise of empowering people working with a culture of innovation, professional development and entrepreneurial spirit.* The following Code of Ethics (“Code”) is designed to meet our mission statement while empowering employees. This code applies to all employees of FIRMA NZ.

1. Conduct

- 1.1. It is expected that Employees of FIRMA NZ adhere to the highest levels of ethics and good judgment both in the workplace, community, and all FIRMA NZ events.
- 1.2. FIRMA NZ Employees are expected to treat everyone in a professional and respectful manner.
- 1.3. Any action that may serve to compromise the integrity of FIRMA NZ will not be allowed and dealt with swiftly.

2. Disclosure

- 2.1. The Employee acknowledges that they have, and will be entrusted with; knowledge of detailed confidential information (examples which include but not limited to: name, address, gender, credit information, etc.) while employed with FIRMA NZ. This information concerns the present and contemplated services, techniques and modes of merchandising involved and used in connection with FIRMA NZ, FIRMA NZ financial information and information concerning FIRMA clients, the disclosure of any confidential information is strictly prohibited.
- 2.2. FIRMA NZ Employees will abide by the federal government’s **Privacy Act** which provides New Zealander’s with a right of privacy with respect to their personal information that is collected, used or disclosed by an organization in the private sector.

3. Corruption and Blackmail

- 3.1. FIRMA NZ defines blackmail as the use of threats to extort property (including money) or to compel a victim to behave in a particular way.
- 3.2. FIRMA NZ has separated corruption into 4 categories: bribery, embezzlement, fraud and extortion.
 - 3.2.1. Bribery is offering, promising or giving any undue pecuniary or other advantage, whether directly or through intermediaries, in order that the official act or the refrain from acting in relation to the performance of official duties, in order to obtain or retain business or other improper advantage.

- 3.2.2 Embezzlement is the fraudulent appropriation of money or property by a person entrusted to safeguard the assets in another's interests.
- 3.2.3 Fraud involves the use of deception, trickery and breach of confidence to gain some unfair or dishonest advantage.
- 3.2.4 Extortion is the unlawful use of one's position or office to obtain money through coercion or threats.
- 3.3 Any form of corruption or blackmail will not be tolerated. If proven guilty, it could result in immediate dismissal and the act reported to local Police authorities.
- 4. Implementation
 - 4.1 Strict observance of this Code is fundamental to the activity of FIRMA NZ. It is essential that all employees (permanent full-time, permanent part-time, temporary, hourly), board members, and volunteers adhere to this Code. Violation of this Code will be seen as a matter of serious consequence and will result in disciplinary action up to and including dismissal.
 - 4.2. For further details in relation to this Code, see The New Zealand Employee Handbook or contact Human Resources.

In signing this document, I accept the terms of the Code and confirm that I have read it thoroughly. I also understand that it is my responsibility to comply with the Code and any revisions made to it.

Signature of Employee

Date

Employee's Name - Printed

Company Representative

Date