



Xero Policy

Code of conduct

This Code of Conduct sets out the ground rules for the way we work at Xero. We place great importance on honesty, integrity, quality, and trust, and we are all expected to adhere to the behavioural standards set out in this Code whenever we are identified as representatives of Xero.

While this Code does not contain a comprehensive list of acceptable ethical behaviour, it will help us to make decisions in our day to day work - whoever we are, whatever we do and wherever we do it.

These standards are driven by our internal values.



#human

Real people with passion and purpose, Who make a difference



#ownership

Own it, drive it, deliver



#champion

Leading the way - creating opportunities for our customers, partners and each other



#challenge

We dream big, inventing better ways to do business



#beautiful

Everything we do. Engage. Delight. Inspire

OUR KEY PRINCIPALS

Each of us is responsible for our own behaviour and we all need to take accountability for the choices we make. In making informed choices, we must have regard to Xero's key principles:

- We value our reputation
- We are professional
- We keep our workplace safe and sound
- We steer clear of conflicts of interest
- We respect confidentiality and privacy
- We act morally
- We are not law-breakers

- We are good corporate citizens
- We respect this Code
- We are a team

1. We value our reputation

We have a great reputation in the market, and we want to keep it. Each of us has the ability to maintain and build that reputation. To do that, we always undertake our duties with care and diligence, and we deal fairly and honestly with each other, and with Xero's customers, suppliers, competitors and any other third parties.

2. We are professional

Xero's shareholders, customers and the community expect everyone who works at Xero to act professionally and ethically. We always strive to meet these expectations and to support others to do the same. We do not tolerate dishonest behaviour by anyone we deal with, and we always act with integrity.

3. We keep our workplace safe and sound

We foster a safe working environment that is inclusive and promotes well being. We treat everyone we deal with at work with dignity and respect. We are familiar with and comply with all of our employment policies, which can be found on our intranet.

4. We steer clear of conflicts of interest

We make sure our individual interests do not interfere with Xero's interests, and we immediately disclose to our managers any business or personal relationships we have which might impact Xero's decision making processes. The perception of a conflict of interest can do as much damage to Xero's reputation as an actual conflict of interest, so we always keep an arm's length relationship when dealing with customers, suppliers or partners.

5. We respect confidentiality and privacy

In our work at Xero, we are entrusted with private and confidential information relating to Xero, colleagues, customers, suppliers, and other third parties. We respect the sensitive nature of this information, and understand that misuse of this information could have severe consequences for those people whose information is misused. We protect all private and confidential information entrusted to Xero, and we never misuse it. We act in accordance with Xero's Privacy Policy (<https://www.xero.com/about/privacy/>) at all times.

6. We act morally

We aren't interested in any improper payments, benefits or gains of any kind. We don't do anything which might suggest that we are giving preferential treatment to a person or company that is offering a reward or gift. We only entertain customers and business associates in a manner approved by management.

7. We are not law-breakers

As a global business, Xero is subject to laws and regulations in all the locations in which we operate. We stay up to date and comply with all applicable laws, and otherwise act

honestly and in good faith at all times. We respect the customs and business practices of the countries in which we operate, but we do not compromise the principles embodied in this Code.

8. We are good corporate citizens

We care about our customers, our shareholders and our staff. We always meet our responsibility to the financial community, and we make meaningful contributions to the wider community whenever we can.

9. We respect this Code

Each of us has a responsibility to abide by this Code and its principles, and to report any conduct that may be in breach of the law, this Code or any other Xero policies. This means we are always conscious of what others around us are doing, and we honestly report all actual and suspected breaches to management or HR. Anyone who breaches this Code may face disciplinary action including termination of their employment or engagement with Xero. However, no action will be taken against a person reporting a suspected breach in good faith.

10. We are a team

We're always innovating and growing, but we never forget that we're in business together. We work hard, and we celebrate our successes as a team.