

# Code of Conduct Policy Summary

December 2023

It's Australian.  
It's super.  
And it's yours.

## Code of Conduct – at a glance

- Our key focus is Members First. Maintaining the trust of our members is critical.
- We build trust by our actions and our Code of Conduct sets out what behaviours are expected.
- Our Board and colleagues are committed to and must comply with the Code of Conduct and have a responsibility to report behaviours inconsistent with it.
- At AustralianSuper we put members first in everything we do, we do business efficiently, honestly, and fairly, and we treat others as we would want to be treated.

## Code of Conduct Policy

AustralianSuper has a global Code of Conduct Policy (which includes the Code of Conduct) that articulates the professional, legal and ethical standards of behaviours expected of all colleagues working for AustralianSuper and of our Board of Directors and Board Committee Members.

Our Code of Conduct Policy also sets out the Board's expectations for AustralianSuper's key values and desired culture, requiring us all to act ethically and in accordance with the Code.

Our values of Excellent Outcomes, Integrity, Generosity of Spirit and Energy are reflected in our Code of Conduct and are central to how we work and what we value.

We build trust by the way we act, by following our Code of Conduct and by always acting with integrity.

# Code of Conduct

The following is AustralianSuper's Code of Conduct.

## Members

**At AustralianSuper we put members first in everything we do.**

Our objective is to help members achieve their best possible retirement outcome.

Members deserve all colleagues to give their very best work every day for members.

We act honestly, professionally and with integrity.

We do not accept inappropriate gifts, entertainment, or corporate hospitality.

We protect member information and privacy.

We avoid or appropriately manage conflicts.

## Integrity

**At AustralianSuper we do business efficiently, honestly, and fairly.**

We obey the law and comply with legislation.

We maintain ethical standards of behaviour.

We do not mislead or deceive.

We provide services that are fit for purpose and delivered with care and skill.

We do not trade or disclose inside information.

We comply with the law and the requirements of relevant regulators.

We maintain accurate business records and have sound controls.

We communicate openly and honestly with investors and members.

Above all, we put members' interests ahead of our own or anyone else's.

## Colleagues

**At AustralianSuper we treat others as we would want to be treated.**

We treat each other professionally, demonstrating courtesy respect and care.

We work collaboratively to achieve the best outcomes inviting and accepting feedback from others and providing feedback constructively.

Respecting others means treating people equally and embracing difference.

We do not tolerate unlawful discrimination, harassment, and bullying.

We provide a safe and healthy workplace.

We behave honestly including providing AustralianSuper with accurate information in connection with our employment / engagement, and disclosing any conflicts of interest.

We provide a supportive working environment that enables all roles to flex.

We expect our colleagues to act ethically to support AustralianSuper in helping members to achieve their best financial position in retirement.

Personal relationships, for example relatives, friends, both current and past, are disclosed early so that any potential conflicts of interest can be appropriately managed.

# Contact us

Call **1300 300 273**

8am to 8pm AEST/AEDT weekdays

Email **[australiansuper.com/email](mailto:australiansuper.com/email)**

Web **[australiansuper.com](http://australiansuper.com)**

Mail **GPO Box 1901**

**Melbourne VIC 3001**

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AustralianSuper Pty Ltd ABN 94 006 457 987, AFSL 233788, Trustee of AustralianSuper ABN 65 714 394 898.