



AustralianSuper Code of Conduct Summary

October 2019

Code of Conduct summary

AustralianSuper has a Code of Conduct which articulates the standards of behaviour expected of all colleagues, including our Board and Directors. The following provides a brief summary of the Fund's Code of Conduct.

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

Members

At AustralianSuper we put members first in everything we do.

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

We act honestly, professionally and with integrity.

We do not accept inappropriate gifts, entertainment or 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 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 APRA's prudential standards.

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 and with respect.

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

Building trust with members

We respect the confidentiality and maintain the security of any information and data we have access to through our work.

AustralianSuper's Privacy Policy sets out how confidential information is to be accessed, released and disclosed especially member information and/or data. All colleagues need to read and be familiar with this policy and comply with it.

We avoid or appropriately manage conflicts of interest

Conflicts of interest can come about when a colleague is in a position to benefit from actions or decisions they make or information they have access to, as part of their role.

Conflicts can occur in relation not only to our own interests but also to those of our family members. All colleagues need to read and be familiar with the Conflicts Management Policy and our procedures and comply with them to ensure that any conflict (potential or actual) is identified, disclosed, appropriately managed or avoided if necessary.

We do not accept inappropriate gifts or entertainment

Corporate hospitality and entertainment can sometimes help strengthen business relationships – but it must always be appropriate. Inappropriate gifts, entertainment or hospitality includes anything that could cause AustralianSuper embarrassment or change the way we do our job or influence our decision-making. We do not therefore accept inappropriate gifts, entertainment or corporate hospitality.

Our Gifts, Entertainment & Corporate Hospitality Policy sets out obligations on what can be accepted and what cannot as well as the disclosures we need to make to our people leader and Compliance. We need to read and be familiar with this policy, comply with it and seek guidance from our people leader or Compliance if we are unsure about the appropriateness of a gift, entertainment or hospitality.

Acting with integrity

We do not trade on or disclose inside information

Particular care needs to be taken if we are designated an Access Person, as we have additional obligations to manage potential conflicts of interest between our personal investment portfolios and any portfolios that we have significant influence or control over.

These obligations are set out in AustralianSuper's Personal Trading Policy. They include registering and keeping current personal portfolio information and seeking pre-trade approval to trade in securities.

We manage risks

We manage the risks associated with the operations of AustralianSuper and the Trustee and are familiar with and comply with the law, APRA Prudential Standards and policies that are relevant to our roles.

We maintain accurate business records and sound internal controls

At AustralianSuper our recordkeeping, accounting and payment practices must be accurate, truthful and legal. We need to ensure that business records and overall financial reporting are complete, truthful, accurate and transparent, comply with all applicable laws, and meet the standards required for good corporate governance.

We communicate openly and honestly with investors and the public

We are committed to disclosing and communicating information about AustralianSuper in a timely and accurate way. We seek to inform and not mislead.

We are all responsible for ensuring company communications and disclosures have received prior approval and for communicating appropriately about AustralianSuper.

Directors are occasionally asked to comment publicly on matters pertaining to superannuation, the investment industry or financial market activity. Directors should engage with the Corporate Affairs team in advance if they are contacted by the media or are undertaking an external speaking engagement on behalf of AustralianSuper as they can provide assistance and useful information.

Building trust with colleagues

We treat one another with respect

We treat all complaints of unlawful discrimination, harassment, bullying, vilification or victimisation seriously. We do not tolerate unlawful or inappropriate behaviour.

AustralianSuper's Equal Opportunity Policy and Diversity & Inclusion Policy set out what is expected in more detail.

We provide a safe and healthy workplace.

Our colleagues' health and wellbeing is our number one priority.

We want all our colleagues to feel safe and protected in their place of work. We also want to ensure any colleague who is affected by domestic or family violence feels safe and supported to seek help at work. As drug and alcohol use can harm our health and safety and impact the rights and enjoyment of those around us, we have guidelines on responsible use of drugs and alcohol in the workplace.

AustralianSuper's Health & Safety Policy, Family and Domestic Violence Policy and Drug & Alcohol Policy set out what is expected in more detail. All colleagues have to read and be familiar with these policies and comply with them.