



AustralianSuper Code of Conduct

June 2018

Code of Conduct summary

AustralianSuper has a Code of Conduct for Employees and a Code of Conduct for Directors which articulate the standards of behaviour expected of staff and Directors. The following provides a brief summary of the codes. Conduct standards on social media usage, IT & telecommunications usage and speaking with the media are also covered in the Codes.

Standards of Conduct

Directors and employees of AustralianSuper are expected to carry out their duties and responsibilities professionally and ethically – observing the following behaviours:

- › Act in accordance with our corporate values
- › exercise due care, skill and diligence
- › act honestly at all times
- › act in the best interests of members
- › show respect for colleagues
- › disclose all conflicts of interest (actual, potential or perceived)
- › perform duties diligently, impartially and responsibly to the best of their ability
- › comply with relevant laws, regulatory and compliance requirements including internal policies relating to the performance of duties

Confidentiality and Privacy

Employees and Directors must respect the confidentiality of information obtained in the course of their role at AustralianSuper and maintain the security of all information and data, including personal information as defined in the Privacy Act 1988 (Cth). This requirement exists both during their tenure on the Board, whilst employed at AustralianSuper and at any time after their engagement with AustralianSuper ends.

Compliance with AustralianSuper's Privacy Policy when dealing with another person's personal information (such as a member's personal information) obtained or accessed in the course of their role at AustralianSuper, is mandatory.

Information Security

To preserve the security and integrity of our information and technology resources against misuse, loss, unauthorised or accidental access, modification or disclosure, employees and Directors are required to comply with our information security policy at all times.

Conflicts of Interest

Employees and Directors need to be aware that conflicts of interest (actual, potential or perceived), may arise from personal interests they hold or duties they owe to other entities and the interests and duties they owe to the Trustee, AustralianSuper and its' members.

Our conflicts management policy articulates disclosure obligations as well as the process for managing conflicts of interests. Disclosure requirements include gifts and entertainment disclosures as well as personal investment portfolio holdings disclosures for certain staff.

Certain personal investments are not permitted and insider trading is strictly prohibited. Employees and Directors must ensure full compliance with Corporation Act requirements.

Anti-bribery

Bribery is unlawful in most countries. AustralianSuper prohibits the payment or receipt of bribes, nationally or internationally.

Dishonesty and fraud

Participating in any type of dishonest or fraudulent activity that directly or indirectly affects AustralianSuper or its members is strictly prohibited.

Discrimination, Harassment and Bullying

AustralianSuper is committed to equal opportunity in employment and providing a working environment free from unlawful discrimination, harassment and bullying. Employees and Directors must not engage in unlawful discrimination, harassment, bullying or any other unlawful conduct referred to in AustralianSuper's Equal Opportunity Policy.

Occupational Health & Safety

AustralianSuper is committed to maintaining a healthy and safe working environment. It is important that employees in particular, are conscious of potential hazards in the workplace and ensure their activities minimise the level of risk to themselves and others.

Reporting Breaches of the Code

Any breaches of the Code must be addressed through the appropriate channels. A Whistle-blower process is available if a person does not wish to report a breach (or suspected breach) of the Code directly to their manager, the Chief Executive or the People & Culture Team. Non-compliance with the Code of Conduct will be taken seriously and may result in disciplinary action. Employees and Directors will not be victimised or discriminated against in any way for reporting alleged breaches of the Code.

Have questions?

Call **1300 300 273**
(8am to 8pm AEST/AEDT weekdays)

Email australiansuper.com/email

Web australiansuper.com

Mail GPO Box 1901, MELBOURNE VIC 3001