

AustralianSuper Global Code of Conduct Summary

December 2022

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 work at building trust with members and each other.
- We build trust by our actions and the Code of Conduct sets out what behaviours are expected.
- Our colleagues are committed to and must comply with the Code of Conduct and have a responsibility to report behaviours inconsistent with it.

Code of Conduct summary

AustralianSuper has a global Code of Conduct Framework (Code of Conduct) which articulates the standards of behaviour expected of all colleagues working for AustralianSuper and of our Board of Directors and Board Committee Members. The following provides a brief summary of the AustralianSuper'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 purpose is to help members achieve their best financial position in retirement.

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 their 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 communicate honestly and openly with investors and members.

We maintain accurate business records and have sound controls.

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 or bullying.

We provide a safe and healthy workplace.

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

Where relevant, we disclose personal relationships we have, so that potential conflicts can be managed appropriately.

Building trust with members

We respect confidentiality and maintain the security of any information and data we have access to through our work. We do not use confidential or personal information for our own benefit or personal or financial gain or for the benefit of anyone else.

Protecting our member's (and others) personal information is important to us and is required by law. Our Privacy Policy sets out our purposes for collecting, holding, using and disclosing personal information. All colleagues are required to undertake training on this Policy on an annual basis and comply with it at all times.

We avoid or appropriately manage conflicts of interest

We do not use our position, contacts or knowledge gained at AustralianSuper for personal benefit.

Conflicts of interest can come about when a colleague, Director or Board Committee Member is in a position to personally benefit from actions or decisions they make or information they have access to through their role at AustralianSuper or when there is a competing duty they have elsewhere.

Conflicts can occur in relation not only to our own interests but also to those of our family members or brought about by our personal relationships. We do not use our position, contacts or knowledge gained at AustralianSuper to benefit ourselves, our family or friends, and avoid inappropriate investment switching. All colleagues are required to undertake training on and comply with the Conflicts Management Policy to ensure that any conflict (potential, perceived or actual) is identified, disclosed, appropriately managed or avoided if necessary. Our members interests must always come first.

We do not accept inappropriate gifts, entertainment or corporate hospitality

We do not accept inappropriate gifts, entertainment or corporate hospitality that may be considered excessive or inappropriate. This includes anything that could cause AustralianSuper embarrassment or change the way we do our job or influence our decision-making.

Our Gifts, Entertainment & Corporate Hospitality Policy sets out obligations on what may be accepted and what cannot as well as the disclosures we need to make to our people leader and to the Governance team in Group Risk. All colleagues are required to undertake training on this policy, comply with it and seek guidance if unsure about the appropriateness of any gift, entertainment or corporate hospitality that is offered.

Acting with integrity

We do not trade on or disclose inside information.

All colleagues, Directors and Board Committee Members are prohibited from trading on or disclosing inside information.

Our Personal Trading and Switching Policy requires us to manage potential conflicts of interest between our personal investment portfolios (or those we have significant influence over) and the interests of the Fund.

Our colleagues have obligations which include registering and keeping current their personal portfolio information (using our conflicts management system) and obtaining pre-trade approval before trading 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, and local regulatory bodies. These include the Australian Prudential Regulation Authority (APRA), Australian Securities & Investments Commission (ASIC), the Financial Conduct Authority (FCA) in the UK and the US Securities and Exchange Commission (SEC), together with related AustralianSuper standards, procedures and policies.

We maintain accurate business records and sound internal controls

At AustralianSuper our record keeping, accounting and payment practices must be accurate, truthful and legal. We need to ensure that business records and financial reporting is complete, truthful, accurate and transparent and that we 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.

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 behaviours.

AustralianSuper's Equal Opportunity Policy sets out what is expected from us and all colleagues undertake training on and must comply with this policy.

We provide a safe and healthy workplace and our colleagues' health and wellbeing is our 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 is 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 Safety, Wellbeing and Mental Health Policy, Family and Domestic Violence Policy and Drug & Alcohol Policy set out what is expected of us in more detail. All colleagues undertake training on and must comply with these policies.

Contact us

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

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