

## Code of Conduct

### Message from the CEO

Everyone working for VicSuper should understand our commitment and obligation to our fellow employees and our members.

This is integral for our commitment to sustainability and our values - making sense, always help, trust and integrity, respect and encouragement, learning and quality, which are central to this Code of Conduct.

The code provides standards of behaviour expected from all employees so that we can continue to build a positive workplace culture.

This code sets very high standards and it is everyone's responsibility to implement the code. Managers have the extra responsibility of ensuring that the code is understood by employees. I expect everyone to read and act on this code - for the benefit of yourselves, your colleagues and our members that we serve.

Michael Dundon  
Chief Executive Officer

## Overview

### Purpose

The Code of Conduct outlines the behavioural expectations of VicSuper and its employees as they work together to pursue the VicSuper vision which comprises VicSuper's core purpose and core values.

### Objectives

- To clearly outline the behavioural expectations of VicSuper and its employees.
- To establish as the norm workplace behaviour aligned with VicSuper's vision.
- To encourage VicSuper and its employees to act fairly in all their dealings.
- To assist in fostering a workplace environment that is safe and free from unlawful discrimination and harassment.
- To encourage responsible use of financial, physical and people resources.

### Scope

This policy applies to VicSuper and all of its employees.

For the purposes of this policy the term 'employee' covers permanent and temporary employees, agency employees, casuals, contractors, consultants, directors and deputy directors, students and volunteers.

### Legislation

There is no legislation directly relevant to this policy.

### Topics

#### Policy

1. Vision
2. VicSuper Pty Ltd
3. Employees

## Policy

### 1. Vision

- 1.1 VicSuper's core purpose is to help people prepare for and meet their income needs in later life by making sense of their superannuation and savings investments. The values that underpin VicSuper actions are:
- making sense
  - always help
  - trust and integrity
  - respect and encouragement
  - learning
  - quality
  - sustainability

### 2. VicSuper Pty Ltd

- 2.1 VicSuper recognises that it exists as a company through its employees. In dealings with its employees VicSuper will act responsibly and conduct itself with integrity, impartiality and accountability. VicSuper is committed to providing a positive and productive working environment that is safe, free from harassment and discrimination and that gives every employee equal employment opportunity.
- 2.2 VicSuper will recognise and encourage excellence and assist its employees to progress to the highest levels personally attainable, consistent with VicSuper's vision. VicSuper will provide processes for resolving workplace issues and grievances and facilitating improved work practices.
- 2.3 VicSuper will maintain up to date policies on employment and workplace issues that are based on the principles of merit and equity and comply with legislation. These policies will be communicated and available to all employees.
- 2.4 Whilst VicSuper is committed to providing the highest standard of service, it recognises that mistakes occur. VicSuper will endeavour to create a working environment where the mistakes can be acknowledged and resolved in a positive manner, resulting in further learning and improvement of procedures.

### 3. Employees

- 3.1 In becoming part of VicSuper, employees become a part of an organisation that is committed to providing the highest standard of service to VicSuper Fund members and employers. Employees will be asked to contribute towards fostering a positive and productive work environment that will enable VicSuper to deliver high quality standards at least equal to best industry practice, but preferably benchmarked against perfection.
- 3.2 Employee behaviour should be in line with VicSuper's values and based on impartiality, accountability and responsive service.
- 3.3 Professional and personal behaviour

- 3.4 To strive to provide the highest standard of service to members and their employers in a cost effective manner, performing duties diligently, fairly, responsively and to the best of the employee's ability.
- 3.5 To identify where possible improvements to administrative systems and procedures to achieve optimal effectiveness, efficiency and responsiveness. If an employee believes an aspect of VicSuper policy or administration may have unforeseen consequences or otherwise requires review, then it should be brought to the attention of the appropriate executive manager.
- 3.6 To conduct all contact with colleagues, members, employers and the public during the course of work fairly and in a professional manner, looking to create long term relationships. Employees should act with propriety, integrity, courtesy and sensitivity and be able to demonstrate this in relation to any advice or service given.
- 3.7 To comply promptly with all lawful directions. If there are personal grounds for complaint arising out of such directions, whether ethical or otherwise, this should be discussed with the appropriate manager and an attempt made to resolve the matter. If the matter is not resolved in the initial attempts a personal grievance may be lodged (using VicSuper's internal grievance procedures) to have the matter resolved. Lawful directions should be carried out until the complaint is resolved.
- 3.8 To contribute to fostering a positive and productive work environment.
- 3.9 To acknowledge mistakes and be proactive in their resolution.
- 3.10 To maintain appropriate knowledge and skills to be able to capably perform role requirements.
- 3.11 To refrain from improper use of drugs, including alcohol, or other substances in the workplace.
- 3.12 Employees should not use their position to obtain a private benefit for someone else. Family or other personal relationships must not improperly influence decisions.
- 3.13 To advise VicSuper of any current or anticipated employment outside VicSuper. This employment should not affect the performance of VicSuper duties or cause a conflict of interest.
- 3.14 To ensure that activities outside working hours do not diminish public confidence in VicSuper or an employee's ability to perform their duties.
- 3.15 An employee should immediately advise the Manager, People & Culture if they are charged with a criminal offence during employment with VicSuper.

#### Policy and legislation

- 3.16 To uphold and comply with all relevant State and Federal Legislation, VicSuper Policies and the relevant employment contract; not allowing a difference between personal beliefs and those held by VicSuper on a particular matter to affect the performance of duties.

- 3.17 To assist in creating a workplace that is safe and free from harassment and unlawful discrimination. That is, to:
- observe relevant occupational health and safety requirements and act to remove or bring to the attention of a manager or supervisor any situation which is, or may be a health or
  - safety hazard
  - refrain from discriminating against or harassing any other person
  - report any unethical behaviour or wrongdoing by any other employee to an appropriate executive manager.

#### Organisational resources

- 3.18 To use organisational facilities and other physical or financial resources for their proper purpose, and maintain them properly, avoiding waste and extravagance.

#### Use and release of information

- 3.19 To uphold the duty of confidentiality relating to information obtained during the course of employment at VicSuper. Information must be stored securely, and not disclosed to any person except in the course of official duties. Personal information has been provided to VicSuper on the understanding it will only be used for a specific purpose and should remain confidential.
- 3.20 Information or documents obtained in the course of employment should only be released when:
- required to do so by law
  - in the course of duty
  - when called to give evidence in court
  - when proper authority has been given except where such information has already been made available officially to the public or if it is normally given to members of the public seeking that information. The information provided should be confined to factual information and should not express opinion on VicSuper policy or practice.
- 3.21 To not take improper advantage of any information gained in the course of employment, either whilst still employed or once an employee has left VicSuper for other employment. This includes gaining a personal advantage (e.g. insider trading; member and employer data), not giving advantage to a prospective employer or disadvantage to VicSuper in commercial or other relationships with a prospective employer.

#### Public comment

- 3.22 As members of the community, employees have the right to make public comment in a private capacity and enter into public debate on political and social issues. Public comment includes any written or electronic comment, public speaking engagements, comments on radio and television and expressing views in letter to the newspapers or in books, journals or notices where it might be expected that the publication or circulation of the comment will spread to the community at large.
- 3.23 To refrain from making public comment where:
- the implication that the public comment, although made in a private capacity, is in some way an official comment by VicSuper, or

- there is a breach of the duty of confidentiality to members or VicSuper, unless authorised by the Chief Executive

3.24 To obtain the prior approval of the Chief Executive before addressing or chairing seminars organised by professional conference organisers.

#### Conflicts of interest

3.25 To be vigilant in identifying conflicts of interest. Where conflicts arise or are likely to arise, employees should ensure they inform their executive manager or the Chief Executive and decline to act or otherwise as appropriate.

#### Gifts and favours

3.26 To maintain integrity by not seeking or accepting favours or gifts from anyone who could benefit by influencing a VicSuper employee.

3.27 Token gifts in the nature of souvenirs, mementos or of a symbolic nature and low material value may be accepted. Gifts and hospitality received of over \$150 dollars must be disclosed via the gifts and hospitality register (refer VicSuper Gifts and Hospitality policy).

#### Confidential Information

3.28 An employee must not disclose inside information to anyone outside the company (including family members), except when such disclosure is needed to enable the company to carry on its business properly and effectively, and appropriate steps have been taken by the company to prevent the misuse of information.

#### Court attendance

3.29 An employee may be summonsed, subpoenaed or called as a witness or juror at a court of law or any legally constituted inquiry. They should immediately advise their manager and, unless otherwise exempted, attend the court or inquiry as specified.

#### Fees for official duties

3.30 VicSuper will maintain the salary of employees whilst they are on jury service. Upon return to work after the completion of jury duty an employee must provide evidence of attendance, the duration of the trial and any payment received. Employees are required to sign over any payment for jury service to VicSuper.

3.31 Any fees received for duties performed as part of an employee's job duties must be signed over to VicSuper, unless the Chief Executive specifically exempts the employee in writing from this requirement.

#### Breaches of the Code

3.32 Any staff member at any time should report breaches of the Code to their Manager, People & Culture or FairCall on 1800 500 965.