

Vision Super Pty Ltd

ABN 50 082 924 561

Code of conduct

Strictly confidential

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STATEMENT OF POLICY

This code sets out the minimum behavioural standards (conduct) required of all directors and employees in relation to ethical issues and conflicts of interest or duty for the Vision Super group. It does not cover every situation or anticipate every eventuality. If you are in doubt about any matter of conduct, you should consult the Chair of the Board, the CEO or your manager, as appropriate.

This policy reflects compliance obligations under a number of Vision Super group policies, frameworks and guidelines including, but not limited to, the:

- [Directors and responsible officers policy](#)
- [Social media use policy](#)
- [Discrimination, sexual harassment and bullying policy](#)
- [Occupational health and safety policy](#)
- [Use of Vision Super systems and technology](#)
- [Conflict management policy](#)
- [Investment governance framework](#)
- [Fraud control plan](#)
- [Compliance plan and policy.](#)

In the event of a potential or alleged breach of the Code of conduct, Vision Super will deal with each set of circumstances on its own facts and in the manner we consider appropriate.

Where this policy is inconsistent with one of our frameworks, the framework overrides this policy.

If you are concerned about a potential or alleged matter related to any aspect of this policy, you may discuss this confidentially with the CEO or Human Resources or Vision Super's independent external whistle-blower service, currently Your Call:

- 1300 788 712 business days between 7pm and 10pm
- www.whistleblowing.com.au or www.your-call.com.au
- Quote code: VISS1947

Code of conduct guidelines

Honesty, propriety and integrity

- You must discharge your duties with due care and diligence, acting at all times with honesty, propriety and integrity and in accordance with company policies and lawful directions
- You must, when in doubt as to the propriety of any course of action, seek the guidance of your manager, the CEO or the Chair of the Board, as appropriate
- Directors and employees must be vigilant against, and must help Vision Super to prevent, fraud, money laundering or terrorist financing activities occurring at Vision Super or through any entities in the Vision Super group. This includes being alert to suspicious customer or supplier behaviour and reporting suspicious activity.

Personal and professional behaviour

- In the performance of your duties, you must:
 - Treat all stakeholders, including fellow directors and employees, with courtesy and sensitivity
 - Act lawfully
 - Act impartially and equitably
 - Report alleged unethical behaviour or suspicion of wrongdoing by any director or employee to the CEO or the Chairman, as appropriate.
- You must not maintain or operate personal trading accounts within the Vision Super group's operations or in the performance of your professional duties
- If engaged in investment activities, you must not accept out of market prices without the prior authorisation of the Chief Investments Officer, or the CEO, or the Chair of the Board, as appropriate
- Where you discover a pricing error on receipt of a transaction confirmation, you must immediately notify the transacting party of the error, regardless of whether the error is favourable or unfavourable to the Vision Super group
- You must take all reasonable steps to guard against the falsification or unauthorised destruction of any document or record.

Behaviour outside hours of duty

- You must conduct your personal affairs in a manner that does not affect your official duties or that is likely to bring the integrity and reputation of the Vision Super group into disrepute, both during regular working hours and when socialising or travelling for business purposes.

Use of alcohol or drugs

- You must not at any time allow the consumption of alcohol or prohibited drugs to adversely affect your work performance or official conduct, or consume alcohol while on duty except where related to your official duties

- If you are taking prescription or non-prescription medication that may affect your behaviour or ability to work, you must inform your manager and/or Human Resources, or the Chair of the Board if you are a Director.

Gifts and hospitality

- You must treat with caution any offer of a gift, favour, entertainment or hospitality
- You should not accept any gift or hospitality in any circumstance from any organisation with an interest in, or potential interest in any Vision Super group tender in progress or under consideration
- Gifts from service providers at times such as Christmas are to be discouraged. If you receive a gift from a service provider, you should return the gift. If the gift is returned/refused you do not need to report it on the gift register. If you accept the gift you must put it into a central repository for fair and equitable distribution in a manner likely to contribute positively to staff morale
- All hospitality and entertainment you accept over the value of a cup of coffee must be recorded on the Vision Super gift register regardless of the value of the hospitality.
 - You should discourage offers of lavish hospitality or entertainment and must record the offer even if refused
 - You may accept hospitality such as a modest lunch providing that such arrangements are in accordance with general industry practice
 - You do not need to report hospitality associated with Continuing Professional Development (CPD) activities that are recorded in the training register
 - You must seek approval of the CEO or the Chair prior to accepting tickets from suppliers to Vision Super to attend sporting, entertainment or cultural events, regardless of the value of the ticket.
- You must seek approval of the CEO or the Chair prior to agreeing to address or chair conferences or seminars organised by professional conference organisers. Any fees employees receive for seminar or conference participation are to be paid to Vision Super Pty Ltd. Any fees directors receive where the participation was a result of their employment with Vision Super, the fee received should be paid to Vision Super. Duly, where the participation is not related to their employment with Vision Super, the fee is not payable to Vision Super.
- You may keep a token of appreciation for participating in the event, such as a modestly valued bottle of wine or book
- If you attend conferences or seminars on behalf of Vision Super and win prizes of any value eg through a business card draw, you must declare the prize for recording in the gift register and consideration of whether it can be kept as a personal gift.

Use of confidential personal and commercial information

- In the course of your employment, you will have access to confidential and personal information, such as salary, medical history and claims. You must keep this information confidential at all times, both during and after your employment with Vision Super
- You must not breach confidentiality agreements or make improper use of information acquired by virtue of your position to directly or indirectly gain a pecuniary advantage for yourself or for any other person or to cause detriment to the Vision Super group

- Where you have access to information that is not generally available to the general public or financial markets, you must not use that information for personal gain
- You must also subscribe to the broader requirement that at all times you will seek no favour and will act according to the belief that personal profit secured by the use of confidential information, including insider trading activities, is dishonest and will be treated according to the relevant laws.

Conflict of interest

- You must avoid conflicts of interest and circumstances in which there might appear to be a conflict of interest. Please refer to the [Conflict management framework](#) for further details
- You must not engage in outside employment or run your own business that interferes with, or is likely to interfere with, the proper performance of your duties or responsibilities, or is likely to give rise to a potential conflict of interest
- You must not engage in private work with, or seek a benefit from, any person or organisation with an interest in an existing or proposed business dealing with the Trustee
- For employees, if you are considering any form of outside employment or are considering starting a business in addition to your employment at Vision Super, you must request permission of the CEO in writing before starting outside employment. Such permission will not be unreasonably withheld
- For Directors, if you are taking up new employment, starting a business, or taking up a directorship with another organisation, you must discuss it with the Chair to ensure no conflict arises
- Where you perform recruitment or other discretionary functions such as claims processing, you must disqualify yourself from dealing with relatives or friends
- Where you have a direct or indirect benefit or financial interest in any matter on which advice is to be given, you must disclose in writing to the CEO or the Chair, as appropriate, the nature of that benefit or financial interest and not take any further part in discussions or the decision making process
- Where you have a personal or business relationship with an employee of Vision Super or an employee of one of Vision Super's service providers, you must declare this relationship to the Head of Human Resources, the CEO or the Chair as soon as you become aware of the conflict.