

# Code of Conduct

For Aware Super Employees and Contractors

## Revision history

Version	Reasons for amendment	Date approved	Approving Committee/Board
1		27 August 2008	Board
2		25 May 2011	Board
3		21 May 2014	Board
4	Annual revision	3 June 2015	Remuneration & HR Committee
5	Annual revision	8 June 2016	Remuneration & HR Committee
6	Annual revision	29 June 2016	Board
7	Annual Review	13 June 2017	Executive Team
8	Annual Review	19 June 2017	Remuneration & HR Committee
9	Annual Review	28 June 2017	Board
10	Annual Review	13 June 2018	Remuneration & HR Committee
11	Annual Review – with further amendment to be approved	27 June 2018	Board
12	Review of Board-proposed amendment	15 August 2018	Remuneration & HR Committee
13	Extend coverage to Directors and Officers. Provide consistency in wording pertaining to workers. Annual Review. Alignment with StatePlus Code of Conduct. Update of Section 9 wording	Provisionally approved 05 August 2019	Steve Hill – Group Executive, People & Workplace Environment
14	Update of organisation values – non-material changes only	30 January 2020	N/A
15	Scheduled review. Update of wording to align with other policies. Replace use of 'worker'	29 July 2020	Board
16	Aware brand revision – non-material changes only	7 September 2020	N/A

# 1 Introduction

At Aware Super, it is both what we say and how we behave that define us, and if we are to be true to our guiding philosophy of Members First, we need consistency in the way we interact with our members and with each other throughout the organisation.

Members First behaviour is underpinned by our core values of:

- Deliver honourably – we are united, trusted and operate with integrity. We take ownership and focus on delivering high quality outcomes;
- Care deeply – we care deeply about our people, members and stakeholders. We are inclusive, open and transparent;
- Lead bravely – we step forward, we continuously improve. We focus on efficiency and simplicity in everything we do.

We are committed to maintaining a work environment that values and utilises the contribution of its employees from diverse backgrounds and experience.

Our Code of Conduct (the **Code**) sets the ground rules for how all Employees and Contractors are expected to behave and interact with each other and our members.

“Employee” is defined as:

- Permanent full-time employees;
- Permanent part-time employees;
- Maximum term employees; and
- Casual employees.

“Contractor” is defined as:

- Agency supplied contractors
- Agency supplied temporary employees;
- Aware Super engaged contractors or employees of a contractor; and
- Employees of a labour hire company.

At its core, the Code is not intended to be read as a set of rules, rather it provides guidance for ethical decision-making and a framework for resolving challenges as they arise. Employees and Contractors are encouraged to discuss any such issues with the Chair, the Chief Executive Officer (CEO), their leaders or peers as appropriate.

In addition to Employees and Contractors, the following sections of the Code of Conduct for Aware Super Employees and Contractors also applies to all Directors and Officers of Aware Super - Sections 3; 4; 5; 7; 8; 9; 10; 12; 14; 15; 16; 17; 18; 19; 20 and 21.

Alongside the Code stands a number of important pieces of Commonwealth and State legislation that affect us and our responsibilities as Employees and Contractors, such as the:

- a) Work Health and Safety Act 2011 (NSW), Work Health and Safety Act 2011 (ACT), the Occupational Health and Safety Act 2004 (Vic), Occupational Safety and Health Act 1984 (WA) or Work Health and Safety Act 2011 (QLD), as applicable
- b) Privacy Act 1988 (Cth), Health Records and Information Privacy Act 2002 (NSW), Health Records Act 2001 (Vic), Health Records (Privacy and Access) Act 1997 (ACT)
- c) Superannuation Industry (Supervision) Act 1993 (Cth)
- d) Trustee Act 1925 (NSW)
- e) Corporations Act 2001 (Cth)
- f) State and Federal anti-discrimination laws.

Please take the time to read through the Code, and contact a member of the Human Resources team, or your Leader with any questions.

## 2 Recruitment and Selection

Recruiting diverse candidates is critical for us to attract the best talent in order to create the best possible retirement outcomes for our members.

Recruitment of Employees and Contractors is based on merit after considering the skills and requirements for the position and the individual's own knowledge, skills and experience to be able to perform in the required position. A probationary period applies to all Employees recruited for an ongoing or maximum-term position.

All prospective Employees and Contractors are required to undertake employment screening prior to commencing with Aware Super, as per the terms and conditions outlined in your individual Employment Agreement or contract of service or engagement. Employment is subject to satisfactory screening confirming that there is no personal insolvency or criminal record that is likely to impact on your ability to perform the inherent requirements of the role. Employment may be subject to the satisfactory outcomes of any other role specific background screening checks, including qualification checks. Ongoing employment, whether permanent or temporary in nature, is contingent on any required checks being submitted within a timely manner.

We may request both police and personal solvency checks at any time during your employment or engagement for ongoing compliance reasons. Continued employment or engagement will be subject to the receipt of satisfactory police and personal solvency reports. Some roles may require additional checks to be completed, such as credit checks. Ongoing engagement with Aware Super may be subject to the receipt of a satisfactory result from these checks.

Where you submit a recruitment referral, any existing personal relationship to the referee must be disclosed in writing to Human Resources and the appropriate hiring manager.

## 3 Policies and Procedures

We maintain a number of policies and procedures that relate to your engagement. These policies may relate to Human Resources or Risk & Compliance and may also include general policies that provide guidance on the required behaviours or actions you are expected to exhibit whilst in the course of performing your role.

As we work in an industry that is constantly evolving, these policies and procedures are periodically reviewed by Aware Super and may be updated from time to time, at Aware Super's absolute discretion, including to take into account of changed circumstances, legislative changes, or new situations.

It is your responsibility to regularly review and adhere to our policies and procedures, including any updates that are made from time to time. These can be found on Pulse and/or by asking your leader or Human Resources. It is an expectation that all mandatory learning assigned to Employees and Contractors is completed by the stated due date.

While you must comply with these policies and procedures, they do not form part of the terms of your employment contract or contract of engagement.

## 4 Personal and Professional Behaviour

Clients and fund members must have full confidence in our integrity. It is therefore essential that you exhibit the highest ethical standards in carrying out your duties. Accordingly, you are expected to:

- a) Perform your duties conscientiously, impartially, with professionalism, objectivity and integrity;
- b) Efficiently and effectively serve clients and the fund members;
- c) Act fairly and honestly in all official dealings with the public, clients and with fund members;
- d) Avoid, or where avoidance is not possible, appropriately manage real or apparent conflicts of interest and act in the best interest of clients and fund members; and
- e) Not engage in conduct that:
  - is unconscionable, misleading or deceptive;
  - is likely to mislead or deceive;
  - involves making false or misleading representations;
  - is not consistent with Aware Super's policies or your contract of employment; or
  - is contrary to law.

In the performance of your duties, you are expected to:

- a) Maintain and develop your knowledge of Aware Super, its purpose and corporate plans as appropriate for your position;
- b) Exercise sound technical, commercial and professional judgement;
- c) Comply with any requirements and guidelines that are made available to you or apply to your position, including any legislative, industrial or administrative requirements relative to your position and any official guidelines concerning the performance of your duties;
- d) Maintain and develop knowledge of your professional field and the superannuation industry;
- e) Ensure that all employment and selection processes you are involved in are managed fairly, equitably, transparently and value the diversity of all potential candidates;
- f) So far as is reasonably practicable, ensure that the workplace is safe, healthy and free from discrimination, bullying and harassment and other unacceptable conduct;
- g) Value and encourage the diversity amongst all Employees and Contractors;
- h) Treat other Employees and Contractors fairly and equitably and with respect and sensitivity to their rights and privacy, providing appropriate examples, guidance and assistance;
- i) Treat fund members with respect and with sensitivity to their rights and privacy, providing appropriate assistance and guidance where necessary, within the scope of licensed activities;
- j) Ensure that Aware Super's resources are used efficiently;
- k) Lead by example and encourage fellow Employees and Contractors to exercise similar qualities of personal and professional behaviour to those outlined above; and
- l) Ensure that Employees, Contractors and resources are managed in a way that will, to the greatest extent possible, avoid the opportunity for unethical behaviour by others.

## 5 Decision Making

You have a responsibility to ensure fairness in decision-making, considering the position of both fund members and Aware Super, where relevant.

You are to avoid acting in a way that is or could be seen to be unreasonable or construed as unlawful discrimination.

You should take all reasonable steps to ensure that the information upon which you base your decisions or actions is factually correct.

Care is to be taken that decisions are not made on irrelevant or improper grounds.

You should avoid unnecessary delay in making decisions or taking action.

## 6 Relationships between the Board and Employees and Contractors

Advice and information provided by you to the Board of Directors (**Board**) or Board Committees should be factually correct, balanced, comprehensive and succinct.

You are expected to maintain an effective working relationship, where relevant, with members of the Board.

Depending on the circumstances, you may deem it appropriate for any disagreement with a direction or request received from the Board to be raised initially with your Group Executive, who is to raise the matter, either verbally or in writing, with the CEO who in turn will notify the Chair.

In providing advice to the Board, you should always act in the best interests of fund members and Aware Super and keep the Board, or Board Committee (as applicable), apprised of all matters relevant to your advice. Employees and Contractors who have a concern that the Board of Directors or a Board Committee has been incorrectly informed or not fully informed on an issue and that, having raised the issue with your leader and Group Executive, there is no intention to correct the situation, should raise such concerns with any of the CEO, the Chair of the Board or the relevant Board Committee Chair, but otherwise keep the concerns confidential.

## 7 Risk and Compliance obligations

Our Risk and Compliance Management Frameworks require regular inputs from all Employees and Contractors. These may include:

- Raising of Incidents (as per Incident Management Policy)
- Rectification of Incidents
- Keeping up to date on Aware Super's risk management framework and the importance of management of risk as part of your daily work activities

- Completion of Risk Assessments, Control Assessments, Compliance obligations, Key Risk Indicator calculations and raising of any new or updated risks to the organisation or members
- Mandatory compliance training modules
- Responding to Internal Audit recommendations

It is expected that you complete these accurately and on a diligent, thoughtful and timely basis.

## 8 Whistleblowing

The Aware Super Whistleblower Policy (accessible via Pulse) outlines the types of conduct that are able to be reported and the procedure for reporting and investigating whistleblowing reports.

An integral aspect of our commitment to always act in the best interests of fund members is fostering an environment in which Employees and Contractors are able to report suspected misconduct – which includes fraud, negligence, default, breach of trust and breach of duty, or an improper state of affairs or circumstances.

Misconduct also includes conduct by Employees and Contractors which is in contravention of the Code, a Aware Super policy or procedure, or the law.

Any Employee or Contractor who reports suspected misconduct in accordance with the Whistleblower Policy may choose to do so anonymously and must not be disadvantaged in their engagement or suffer adverse action because of the report or their intention to report.

Our Risk Appetite Statement specifies that we have zero tolerance for misconduct. Where you have a reasonable basis to suspect that fraudulent activity or misconduct may have occurred or is occurring, you are strongly encouraged to report the circumstances to the Chief Risk Officer or to the Deloitte Whistleblower Service. Details of this service and other eligible recipients of whistleblowing reports can be found in the Whistleblower Policy.

## 9 Workplace Behaviour

Aware Super is committed to providing you and all Employees and Contractors with a healthy and safe work environment. We have a zero tolerance to workplace discrimination, bullying, harassment, victimisation and other unacceptable conduct.

Our Workplace Behaviour Policy (accessible via Pulse) sets out the meaning of these terms and the procedure for you to follow if you feel that you have been bullied, harassed, sexually harassed, victimised or unlawfully discriminated against in the workplace.

All Employees and Contractors have a duty, along with everyone at Aware Super, to take reasonable care that their acts do not adversely affect the health and safety of other persons. This means you must not bully, harass, sexually harass, victimise or unlawfully discriminate against any other person at work, including Employees, Directors, fund members, Contractors, suppliers or visitors.

## 10 Public Comment

'Public comment' includes speaking engagements (including comments on radio and television), expressing views in letters to the press or in books or notices, or via electronic means, where it is reasonably foreseeable that publication or circulation of the comment will enter the public domain.

You need to remain alert to the risk that comments made via electronic means (email, social media), even if intended to be private in nature, have the potential to become public. Therefore, you are expected to use caution and discretion in relation to matters relating to Aware Super, its Employees, Contractors, Directors, fund members or the fund. You are also required to adhere to the principles outlined within our Social Media Guidelines which is available on Pulse.

The Chair, CEO and Group Executives (or appropriate delegate) and Head of Corporate Affairs and Communications are the only persons authorised to provide comment on behalf of Aware Super to the media on matters relating to the trustee or the fund. Authority may be delegated to a relevant person by any of these persons, but comment can only be made once this delegation has been made.

If you are invited to participate in an industry or public forum in your capacity as an Employee or Contractor representing Aware Super, where matters relating to superannuation or other matters relevant to our business are to be discussed, the approval of the Chair, CEO, Group Executive or Head of Corporate Affairs and Communications (or appropriate delegate) must first be obtained prior to accepting such invitations.

If you wish to participate in any public discussion on matters relating to superannuation or other matters relevant to our business in your capacity as a member of the community, or as an official of another organisation, the approval of the Chair, CEO, Group Executive (or appropriate delegate) or Head of Corporate Affairs and Communications should first be obtained prior to participating in such discussion. You should ensure that it is clear that your participation is not as an official spokesperson of Aware Super and, if any matters relating to superannuation or other matters relevant to our business are discussed, any comments should be limited to positioning us in a positive manner. In any case of approved public comment or debate, you should only disclose information in relation to the trustee or the fund that is publicly available.

Other information, including confidential or sensitive information about Aware Super, should only be disclosed by you if explicitly authorised by the Chair, CEO or Group Executive.

## 11 Provision of advice to members and prospective members

Employees who hold a RG146 qualification or equivalent **and** who are authorised to do, so may provide general product advice in respect of superannuation products to fund members and/or prospective members in accordance with either the Aware Super Pty Ltd Australian Financial Services Licence (ASFL) or the Aware Financial Services Australia Limited ("Aware Financial Services") Australian Financial Services Licence (AFSL). Employees, when specifically authorised to do so, may provide factual information and general advice but should not make any specific recommendation to members and/or prospective members.

Personal advice (either intrafund or comprehensive) can only be provided by Employees specifically authorised to provide such advice under the Aware Financial Services AFSL. This is noted in the Authorisation Certificate issued on behalf of Aware Financial Services to the Employee.

Further, all Employees authorised by Aware Financial Services to provide personal advice must abide by the Financial Planning Association (FPA) Code of Ethics as follows:

- Principle 1: Client First – Place the client's interest first
- Principle 2: Integrity – Provide professional services with integrity
- Principle 3: Objectivity – Provide professional services objectively
- Principle 4: Fairness – Be fair and reasonable in all professional relationships. Disclose and manage conflicts of interest
- Principle 5: Professionalism – Act in a manner that demonstrates exemplary professional conduct
- Principle 6: Competence – Maintain the abilities, skills and knowledge necessary to provide professional services competently
- Principle 7: Confidentiality – Protect the confidentiality of all client information
- Principle 8: Diligence – Provide professional services diligently Outside Employment

## 12 Confidential Information

In the course of your engagement, you will become aware of or generate confidential information. Your obligations concerning the use and disclosure of confidential information are outlined in your employment contract or contract of engagement (where applicable) and are complemented by the obligations set out below. You may also have obligations under common law. Your duties with respect to confidential information apply during your employment or engagement and after the conclusion of your employment or engagement with Aware Super.

You must keep confidential all confidential information other than confidential information that:

- a) you are required to disclose in the course of your duties as an Employee or Contractor; or
- b) you are required by law to disclose.

You must only use confidential information for the purpose of performing your duties as an Employee or Contractor. You must not use confidential information for your personal gain or to assist another person in obtaining a personal gain.

You must immediately notify Aware Super of any suspected or actual unauthorised use, copying or disclosure of confidential information.

If you are required by law to disclose confidential information you must, to the extent allowed by law, immediately notify your leader and Group Executive in writing of the requirement to disclose the confidential information and the extent of the disclosure of the confidential information.

## 13 Intellectual Property Rights & Moral Rights

You assign to Aware Super any existing and future intellectual property rights in relation to any intellectual property developed, invented or created by you in the course of, in connection with or arising out of your employment or

engagement with Aware Super, unless otherwise agreed in writing between you, your Group Executive or appropriate Head of, and your leader. You consent to any act or omission by Aware Super which infringes any moral rights you have in respect of these intellectual property rights.

## 14 Privacy

You must ensure that personal information that we collect and hold is respected and fully protected in accordance with the *Privacy Act 1988* (Cth).

The Aware Super Privacy Policy and the associated policies and standards (accessible via Pulse) outlines the requirements which must be met when dealing with personal information. These policies can be accessed from Pulse and you must comply with them. Some of the key requirements are:

- If you have access to the Information Systems used to administer the Fund, you must ensure that you respect and fully protect the information that relates to Fund members and / or other individuals. This includes not sharing private or confidential information with other Employees and Contractors unless they need it to perform their work.
- You must not access this information unless you are required, and therefore authorised, to do so in the proper performance of your role.
- Never release personal information that we hold to third parties unless the individual to whom the information relates to has agreed or if we are required to release the information under the law. This includes not giving any information to family members, friends or others about an account to which they are not a signatory.
- Follow procedures and requirements to protect information whenever you collect or provide details over the phone or email.
- Follow all protocols and procedures relating to the maintenance of passwords and user profile setup. Never allow someone else to log on using your individual details.
- Collect, use, store, handle, update and destroy information, particularly personal information, in line with applicable policies and processes at all times.
- Report unauthorised disclosure of personal information to the Privacy Officer in accordance with our Incident Management policy.

To protect our information and the personal information we hold against *phishing* (a technique used to entice people into clicking on links or opening attachments from emails) be suspicious of:

- Emails from unknown senders;
- Unsolicited attachments; and
- Links to unrecognized or misspelt sites.

Where you have a concern refer the email to the Technology team via ServiceNow.

You must also ensure that any personal information (e.g. curriculum vitae/resumes) of individuals who approach us regarding current and future employment is respected and fully protected at all times in accordance with the *Privacy Act 1988* (Cth).

## 15 Use of Aware Super Assets

Subject to Section 16 below, Aware Super's assets must only be used for the purposes permitted by applicable superannuation legislation or the fund's Trust Deed and Rules, and under no circumstances for private purposes.

Employees and Contractors have a personal responsibility to ensure Aware Super's funds and assets are validly and appropriately used and are only used for proper purposes. Employees and Contractors may fulfil this responsibility by authorising or certifying expenditure in accordance with the delegations approved by the Board of Directors or in establishing systems of control related to expenditure (as appropriate).

Credit cards supplied by Aware Super must only be used for appropriately authorised corporate expenditure in accordance with our expenditure policy.

## 16 Use of Aware Super Facilities and Equipment

You may be provided with services, facilities and equipment for your use in exercising the duties of your employment or in providing services as part of your engagement and within reason, you are permitted to use these services, facilities and equipment, for private use.

It is your responsibility to ensure that on receiving equipment (such as iPhone/Blackberry, iPad, laptop, remote access connector, or other electronic communication device), you are aware of all of the terms and conditions of use, including any relevant Aware Super policy governing their usage, and are able to abide by them. Such terms and conditions may impose responsibility to monitor monthly usage and charges levels, maintain security (including use of passwords/PINs, safe storage, virus protection), and timely and appropriate reporting if lost or stolen.

You should not expect that any information or file transmitted or stored through our communication systems will be private. All such information is the property of Aware Super and, subject to our obligations under federal privacy and other relevant legislation, may be accessed and used by Aware Super at any time and for any purpose.

## 17 Prohibitions on Using or Disclosing Inside Information

You must comply with Aware Super's Insider Trading Policy. This policy can be accessed from Pulse. This policy requires each Employee and Contractor of Aware Super to ensure that any market sensitive information obtained

by them in the course of their engagement or dealings in relation to Aware Super's business is not disclosed, shared or discussed with any external person and/or party otherwise than in the proper performance of their role.

Employees and Contractors are prohibited from placing personal trades while in possession of market sensitive or inside information. This includes, but is not limited to, any confidential information in relation to asset transitions, significant deals and IPOs involving the trading of securities.

The Insider Trading Policy applies to Employees, Contractors and other Associated Persons as defined in the Insider Trading Policy. The policy also applies to dealing in any indirect holdings in which Employees and Contractors may have an interest such as an SMSF or any other investment vehicle.

Employees and Contractors from time to time may be notified of a Prohibited Securities/Financial Products Blacklist (Blacklist). Employees and Contractors are prohibited from trading in prohibited securities or financial products on the Blacklist for the duration of the declared blackout period.

In line with the Insider trading policy, some Employees and Contractors will also be subject to pre-trade approval for all Personal Account transactions. These Employees and Contractors may also be subject to an audit of personal broker statements. Pre-trade approval will be valid for one (1) day following authorisation and a minimum holding period for the security will apply. Relevant Employees and Contractors will be made aware of this requirement upon commencing employment at Aware Super and where a role change occurs.

On an annual basis, all relevant Employees and Contractors must complete Insider Trading Awareness training and provide an attestation confirming compliance with the Insider Trading Policy.

## 18 Recognising and Managing Conflicts of Interest

A conflict of interest refers to situations in which personal, occupational or financial considerations may affect, or appear to affect, your objectivity, judgement or ability to act in the best interests of the trustee, the fund, fund members, or beneficiaries when carrying out your duties as an Employee or Contractor. Conflicts of interest can arise in a variety of situations including where you have a personal interest which may conflict with your professional obligations. This can include having close personal relationships with other Employees and Contractors (see sub-section below).

As an Employee or Contractor, you may often be the only person aware of the potential for a conflict to arise. It is therefore your responsibility to avoid any conflict of interest or duties including a financial or other interest or duties owed to other parties that could compromise the independent and impartial performance of your duties for Aware Super. You must also disclose any potential, perceived or actual conflict of interests to Human Resources (if you are not a Responsible Person under the Fit and Proper Policy or, in the instance of a possible conflict of interest due a close personal relationship) or the Company Secretary (if you are a Responsible Person) as soon as you become aware of it.

All conflicts of interest must be managed in accordance with Aware Super's Conflicts of Interest Policy (accessible via Pulse). If you are in any doubt whatsoever as to whether you may be in a conflict of interest situation you should contact your leader or Human Resources.

### **Close Personal Relationships**

Close personal relationships may potentially cause conflicts of interest. Close personal relationships include any romantic, intimate and / or sexual relationships including dating, co-habiting, marriage or civil partnerships, as well as close family relationships (including those with parents, siblings or children).

A close personal relationship must be disclosed if:

- one of the members of the relationship reports directly or indirectly to the other;
- it is between people of differing seniority within the same division / department;
- there is a reasonable risk of a conflict of interest or perceived conflict arising; or
- the relationship is with an executive / senior leader.

The relationship should be disclosed to a Human Resources representative and the obligations to disclose the relationship applies to both parties to the relationship.

In the event of a conflict arising due to a close personal relationship, a risk management plan will be developed and adopted to address any conflicts. Any adjustments made in order to address any issues and concerns in these situations will be consistent with relevant employment obligations and laws and may include, but are not limited to, temporary or permanent changes to workplace arrangements, reporting lines, work matters undertaken or decision-making authority with respect to the parties involved in the close personal relationship. Any changes will be made in consultation with both parties and taking into account business requirements.

We understand that people will naturally be concerned about confidentiality and as such any disclosures made under this Section will be kept confidentially on a secure file within Human Resources. The information will only be shared outside of Human Resources where and to the extent required to implement any changes in working arrangements necessitated by the particular disclosure.

## 19 Gifts, Benefits, Travel, Hospitality

During your engagement, you may receive offers of gifts and benefits – e.g. from a fund member or a contractor or supplier. It is critical that you be aware that acceptance of gifts and benefits may place you in a position where you may feel obliged to act contrary to good governance and sound ethical standards.

In deciding whether to accept gifts or benefits, the following principles apply:

- a) You must not accept any gifts or benefits, where the receipt or expectation of receipt might in any way tend to influence, or appear to influence you in the performance of your duties;
- b) You should avoid all situations in which the appearance may be created that any person or body, through the provision of hospitality or benefits of any kind is securing, or attempting to secure or influence, your favour;
- c) You should take all reasonable steps to ensure that family members are not the recipients of benefits that could give the appearance of an indirect attempt to influence you or secure your favour.

### 19.1 Token Gifts or Benefits:

You may accept unsolicited gifts of a token kind (of unsubstantial value) or moderate acts of hospitality provided that you are satisfied that your position will not in any way be compromised or appear to be compromised by acceptance. A measure of whether a gift or invitation is token in nature may be made by reference to whether

such a gift or invitation would be likely to be made by Aware Super in return. If in doubt, follow the process below as if the gift received was a substantial gift or benefit.

Examples of token gifts are:

- Company-branded pen;
- Notebook;
- Chocolates;
- Flowers;
- Generic souvenir of the organisation presenting it (e.g. Plaque, badge, item of small value with the organisation's logo); or
- Genuine business lunches.

### 19.2 Substantial Gifts or Benefits

Where any substantial gifts, benefits or acts of hospitality or the offer or suggestion of such is made directly or indirectly to you, before acceptance, you must report the facts at the first opportunity to your leader (or in the case of the CEO, to the Chair of the Board), and be bound by your leader's decision.

All gifts or benefits received or declined by you must be reported to the Company Secretary for recording in the Aware Super Register of Gifts. Any gift with a value of \$250 or more will be published on our public website.

## 20 Political Participation

If you are involved in the political arena, for example, in a fundraising capacity for a political party, cause or movement, you should be aware of the potential for conflicts of interest and comply with the procedures regarding conflicts of interest, detailed in Section 18 of this Code.

You are not authorised to participate in political activities in your official capacity as an Employee or Contractor of Aware Super.

You should not place your fellow Employees, Contractors or Aware Super, in a position of conflict by inviting them to participate in political events.

## 21 Outside Work

Written consent of the appropriate Group Executive (or their delegate) must be obtained before continuing in, or taking up, any other work or private practice that may create a conflict of interest for the Fund. A conflict of interest is a situation referred to in Section 18 of this Code. To obtain consent to perform other work, you must inform your leader and Human Resources (if you are not a Responsible Person) or the Company Secretary (if you are a Responsible Person) of the work or private practice that you intend to take up or continue. Human Resources or the Company Secretary (as appropriate) will then liaise with the appropriate Group Executive to seek consent and will inform you of the outcome.

Other work or private practice includes being appointed to or engaged in any position whether or not you are remunerated. In approving applications to engage in such activities, the Group Executive will consider whether a conflict might arise between these activities and your responsibilities as an Employee or Contractor of Aware Super. The Group Executive has no obligation to approve your request to participate in outside work (whether paid or unpaid).

## 22 Breach of Code

You are required to comply with this Code as varied from time to time

A breach of your obligations under the Code may result in disciplinary action being taken by Aware Super up to and including termination of your employment (or engagement), including as applicable, in accordance with the provisions of your employment contract.

## 23 Responsibilities of Employees and Contractors who leave

If you accept a job offer with another employer which bears any close or sensitive connection with your current activities in your employment with Aware Super or those of Aware Super more broadly, you must declare this, in good faith, to your leader as soon as possible.

After your engagement with Aware Super concludes, you must return all documentation and equipment provided or obtained during your engagement. As indicated previously, intellectual property remains the property of Aware Super unless there is an agreement in writing to the contrary. Your obligations under Section 12 to protect Aware Super's confidential information continue to apply after the termination of your employment or engagement with Aware Super.

Certain Employees and Contractors may also have additional obligations under their employment contracts in relation to restrictions on activities after their employment with Aware Super ends. Employees and Contractors should check their individual contracts to confirm if any such obligations apply.

## 24 Review of Code

This Code will be periodically reviewed and may be altered from time to time, at Aware Super's absolute discretion, including to take account of changed circumstances, legislative changes, or new situations.

The information contained in this policy does not form part of the terms of any Employee's employment contract or Contractor's engagement with Aware Super and, as such, is not contractually binding on Aware Super.

# 25 Acknowledgement

I have received and read my personal copy of the Code.

I am familiar with the standards contained in the Code and agree to comply with the principles, standards and practices described in the Code.

I also confirm that I have read and agree to comply with the principles, standards and practices required by the key Aware Super policies referenced in this Code, including, but not limited to the:

- Conflicts of Interest Policy;
- Whistleblower Policy;
- Privacy Policy;
- Workplace Behaviour Policy;
- Social Media Guidelines; and
- Insider Trading Policy.

I acknowledge that I have read and understood this version of the Aware Super Code of Conduct:

Name	Signature	Date