



Code of conduct.

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Our values



Be brave

We're innovative, creative and agile problem-solvers.

We try new ways by constantly learning and growing.

We encourage critical thinking, communication and respectful discussion.



Be connected

We're here for our community, we listen, we understand, we deliver.

We're here for each other, we support, we respect, we care.

We're here to succeed, celebrate and have fun.



Be you

We embrace diversity of perspective, experiences and thought.

We're authentic, unique and can be our whole selves at work.



Be accountable

We're responsible for our actions and behaviours.

We're trusted, we're reliable, we're respected.

Our focus

Easy, personal and everywhere

BIG ENOUGH TO MAKE A DIFFERENCE AND SMALL ENOUGH TO CARE.



Innovate

Digital innovation.
Data driven insights.
Competitive returns and fees.

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Grow

Establish our brand.
Expand our distribution.
Pursue growth.



Enable

Attract and nurture capability.
Build the right mindset.
Create business improvements.

Building trust through individual integrity

We act with integrity

Each one of us must take individual responsibility for acting with integrity at all times, even when it means making difficult choices. This is the founding principle of the *Code of conduct*.

Make sure you

- Obey all laws and regulations that apply to your work.
- Understand and adhere to the letter and spirit of this code and our policies.
- Take all required training to understand your responsibilities.
- Act honestly in all of your business dealings.
- Don't use work time for private gain.
- Speak up if you have a concern about any work related behaviour that may be a violation of the law, this code or our policies. Raise concerns with your managers at any level, or with Governance, Risk and Compliance or People and Culture.
- Cooperate in internal and external audits and investigations by fully and truthfully providing information and preserving all materials that might be relevant, as per our policies.
- The *Whistleblower policy* sets out how Spirit Super will support you so that you can safely express your concern where you suspect misconduct, or an improper state of affairs or circumstances, regarding Spirit Super or our related entities know who to contact, how to make a report and the protections available to you.

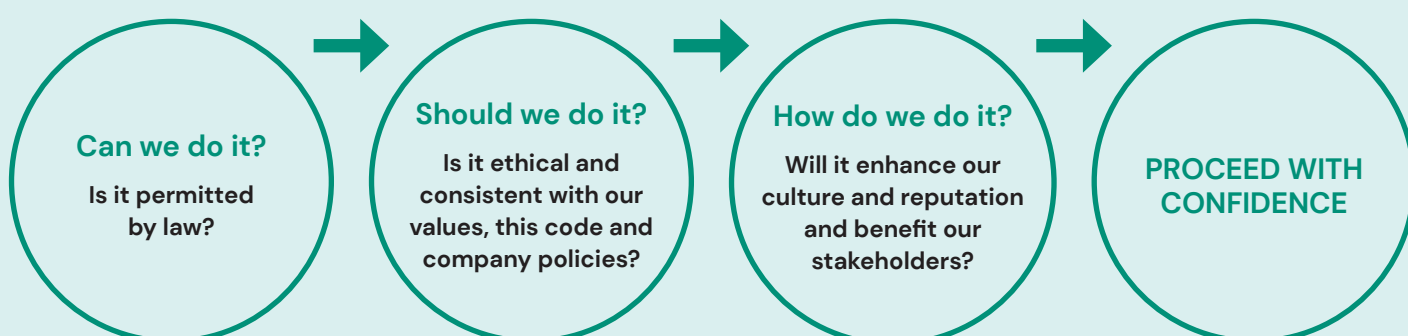
Making decisions

How we make a decision says as much about who we are as a company as the decision itself. It's important that we make decisions that we can be proud of; decisions that support behaviours that are legal, ethical and responsible.

Before you make a decision, use the decision tool shown below.

Our decision tool

If the answer to any of the questions in the diagram below is no, STOP and speak up.



The importance of seeking guidance and speaking up

We're committed to choosing our actions with care, and owning and fixing mistakes promptly. Consult, pick up the phone, send an email, set up a meeting, speak up. Speaking up is crucial to our long-term results – it's a living example of our values and culture.

Speaking up when something doesn't seem right demonstrates our integrity and that we have the courage to do the right thing.

Don't hesitate to raise concerns or seek guidance from your managers, Governance, Risk and Compliance or People and Culture. Your fast action can help us to retain and build trust, as well as allow everyone to learn from mistakes.

If you feel unable to raise concerns internally you may also contact **Your Call**, an online independent third party operated service or please refer to the *Whistleblower policy*.

No retaliation

We won't tolerate retaliation against any colleague who raises a concern about a violation of the law, this code or our policies in good faith.

Retaliation can be in any form or reprisal, direct or subtle, for reporting in good faith actual or suspected issues.

A colleague who makes an allegation they believe to be false is in violation of this code and will be subject to disciplinary action. Reporting a concern doesn't relieve a colleague of accountability for misconduct.

Accountability

This code applies to all board members, managers and employees ('colleagues') of Spirit Super. We won't transact, or continue to transact, with consultants, contractors, agents, subcontractors or suppliers, where they've failed to comply with relevant aspects of our compliance policies.

No colleague may use a third party to do something prohibited by this code. Colleagues who violate the law, this code or our policies may be subject to disciplinary action.

Watch out for

We'll inevitably face difficult situations in our work. These things to 'watch out for' should alert you to potential problems and signal the need to speak up or seek guidance. For example, watch out for:

- temptations to compromise integrity for returns
- pressures to get things done before knowing the risk involved or what the law, this code or our policies require
- excuses for sacrificing integrity, such as 'our competitors do it'
- assumption that 'someone else' will address a problem or that management already knows about it.

When you come across any of the situations outlined above, speak up. Talk to a manager, Governance, Risk and Compliance or People and Culture.

Leaders have additional responsibilities

If you manage others you must lead by example:

- hold yourself to the highest standards of conduct
- make those standards clear to those who report to you
- create an atmosphere that encourages open and honest communication
- take an active role in understanding the risks inherent in your colleagues' work
- give effective guidance when needed.

Make sure you:

- communicate the letter and spirit of this code to those who report to you and to your other colleagues. Make sure that those who report to you are trained in our policies and procedures
- take an active role in assuring the quality of work produced by those who report to you
- ensure that communications with members, colleagues and other business partners are fair and honest
- use adherence to this code and our policies as a factor when you evaluate and recommend compensation for those who report to you

- communicate to those you supervise that your door is always open for them to report a mistake or conflict of interest, raise a concern or discuss a difficult business choice
- make it clear to those you supervise they're free to report concerns through other channels as well including **Your Call**
- respond quickly and effectively to concerns that colleagues raise
- take prompt remedial action when mistakes or misconduct are discovered
- notify Governance, Risk and Compliance or People and Culture when you encounter a potential violation of the law, this code or our policies
- make appropriate disclosure to members or other business partners when mistakes occur or when conflicts of interest rise, after consulting with a manager or with Governance, Risk and Compliance or People and Culture.

Building trust with colleagues

Treat others with respect

We treat others as we would want to be treated.

We're committed to maintaining an inclusive, equal opportunity work environment that respects the dignity of all colleagues and business partners regardless of background and personal characteristics. The unique contribution of every colleague is fundamental to driving our overall success.

Watch out for:

- comments, jokes or materials including emails, which others might consider offensive
- repeated behaviour that may be considered inappropriate
- committees or recruitment panels that appear unbalanced.

Make sure you:

- treat others respectfully and professionally
- promote diversity in hiring and other employment decisions
- don't discriminate against or harass a colleague on the basis of race, colour, religion, national origin, age, sex, family responsibilities, pregnancy or potential pregnancy, union membership or non-membership, mental or physical disability, military service, marital status, sexual orientation or any other characteristic protected by law or our policies
- don't sexually harass a colleague. Sexual harassment includes sexual advances, inappropriate references to sex or conduct of a sexual nature.

To learn more:

- consult the *Working at Spirit Super* handbook
- talk to your manager, Governance, Risk and Compliance or People and Culture.

We provide a safe and healthy workplace

Watch out for:

- unsafe practices or work conditions, such as using a handheld device while driving
- lax enforcement of security standards, such as facility entry procedures and password protocols
- colleagues acting in a manner that's inconsistent with their normal behaviour
- workplaces and practices that aren't ergonomically appropriate
- signs of substance abuse in colleagues.

Make sure you:

- observe safety, security and health rules and practices that apply to your job noting that safety includes both physical and psychological
- don't conduct yourself in a way that may cause unwarranted offense or embarrassment or give rise to the reasonable suspicion or appearance of improper conduct of biased performance
- don't act for an improper or ulterior purpose to the detriment, whether perceived or actual, of Spirit Super
- never sell, possess or use illegal drugs in the workplace or while conducting Spirit Super business or in any personal capacity such that it would bring disrepute to Spirit Super
- don't come to work or conduct Spirit Super business while intoxicated or under the influence of drugs or alcohol
- immediately report risks to safety, security, hazards and any workplace accident or injury through MySpirit. If you sustain an injury let your manager know and immediately see a first aid officer.

To learn more:

- consult the *Working at Spirit Super* handbook.

We respect privacy and personal information

Colleagues place their trust in each other. We safeguard our colleagues' and members' confidential information. This includes information we collect and process for People and Culture, recruiting, remunerating and training colleagues, managing individual performance, member administration, ensuring work health and safety benefits and providing occupational health and safety.

Watch out for:

- unintentional exposure of colleague information in public settings, such as during phone calls or while working at your laptop
- information left visible on desks or computer screens
- talking loudly while discussing colleagues' details
- requests for information without appropriate authority.

Make sure you:

- understand and adhere to the law and our policies on the use, protection and retention of information about colleagues
- learn about the types of information given heightened protection by the law and our policies and protect them through appropriate means
- consult Governance, Risk and Compliance or People and Culture if a law enforcement or regulatory authority or any other person outside of Spirit Super requests information about a colleague
- store Spirit Super information in the correct place
- immediately report any loss or inadvertent disclosure of colleague information to a manager.

To learn more

- consult the *Working at Spirit Super* handbook
- consult the *Information management framework – Information security policy*.

Building trust with members

Treat members fairly

We're honest and professional. We treat members fairly. We work to understand and meet our members' needs, while always remaining true to our own ethical standards. We tell the truth about our services and capabilities. We don't make promises we can't keep. In short, we treat each member as a person, not just a number.

Watch out for:

- pressures from colleagues or managers to cut corners on quality or delivery standards
- temptations to tell members what you think they want to hear rather than the truth
- comments from members that may be considered offensive or disrespectful to others
- giving advice rather than information (unless authorised to do so).

Make sure you:

- treat each member fairly and honestly
- develop and deliver products according to our procedures, including appropriate reviews
- promptly raise any concern about a potential error, omission, or defect in quality with a manager or Governance, Risk and Compliance
- comply with all licensing and other legal requirements that apply to your work
- never follow a member's request to do something unethical or unlawful. If you're uncertain of the right course consult a manager or Governance, Risk and Compliance.

To learn more

- consult the *Conflicts management policy*
- talk to Governance, Risk and Compliance.

We protect member information

Members place their trust in us. In the course of providing services to members we're provided with confidential information in order for us to serve their needs. When this occurs, we maintain and safeguard this information securely, so that it's not improperly or insecurely disclosed or used.

Watch out for:

- unintentional exposure of confidential member information in public settings, such as during phone calls or while working on your laptop
- requests for, or access to, members' information without appropriate reasons
- leaving member information on desks or computer screens
- releasing members' information to third parties.

Make sure you:

- understand and adhere to the law and our policies on the use, protection and retention of information about members
- learn about the types of information given heightened protection by the law and our policies and protect them through appropriate means
- consult Governance, Risk and Compliance or People and Culture if a law enforcement or regulatory authority or any other persons outside of Spirit Super requests member information
- immediately report any loss or inadvertent disclosure of member information to a manager.

To learn more:

- consult the *Privacy policy* – located on the Spirit Super website
- consult the *Information management framework – Information security policy*.

Inappropriate use of information

Spirit Super, and all of its colleagues, have a commitment to comply with the federal and state privacy laws, company and securities laws and regulations. All colleagues are required to protect the security and privacy of our information.

Examples of types of material information are financial results, financial forecasts, possible mergers, acquisitions, joint ventures, other purchases and sales of, or investments in, companies, obtaining or losing important contracts, member data, important product developments, and major changes in business direction.

All information is considered non-public unless it's been expressly prepared for public release.



Building trust in Spirit Super

We build strong relationships with our suppliers

Engaging suppliers and subcontractors who provide superior service on reasonable terms is important to our success.

Watch out for:

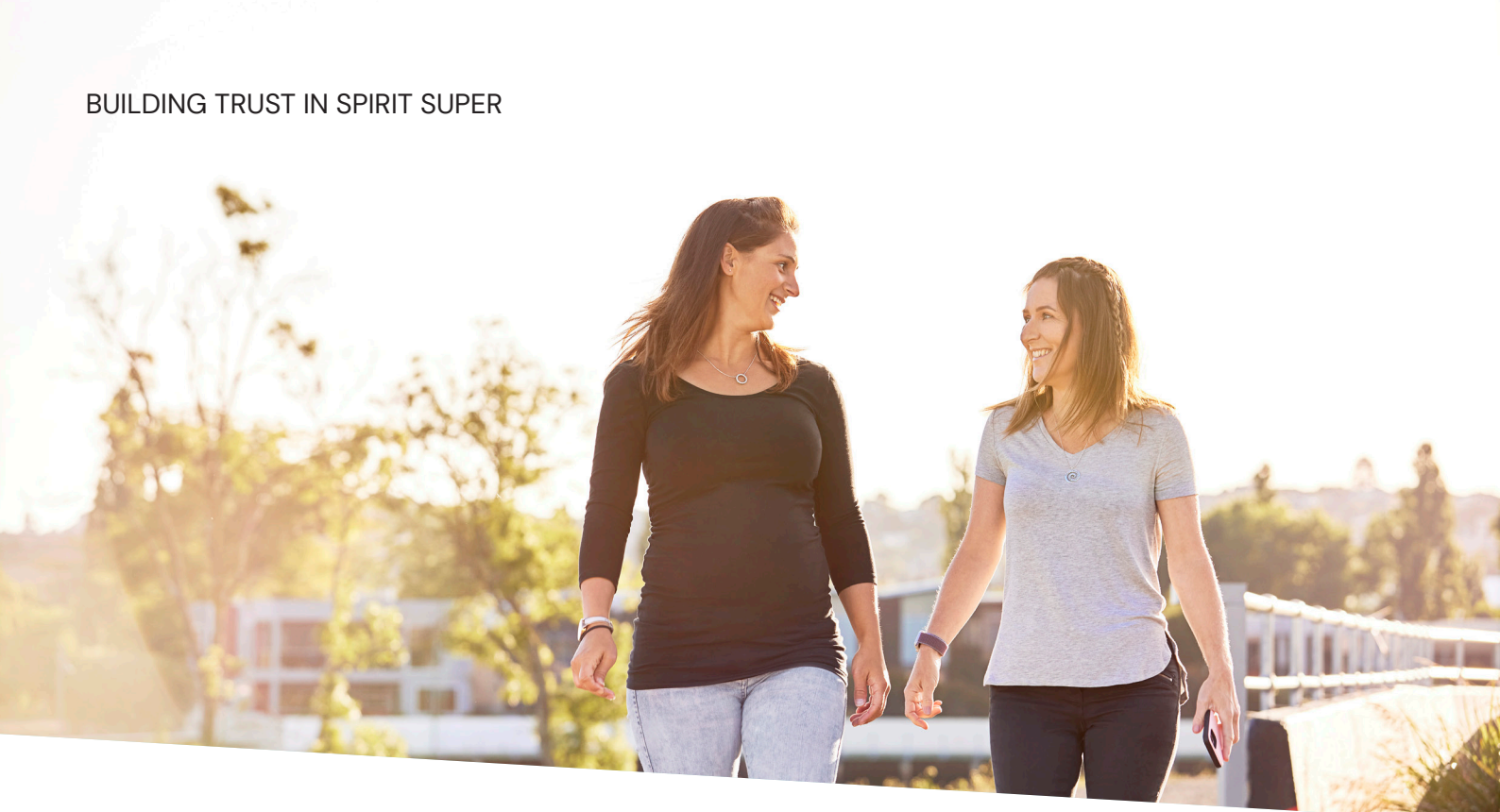
- any relationship between you and a supplier that is, or could be perceived as, a conflict of interest
- pressures to choose a supplier that doesn't offer competitive products, services, process or terms
- supplier practices that could jeopardise our reputation or fail to address modern slavery.

Make sure you:

- choose suppliers and contractors based on the quality of their products and services, and the competitiveness of the process and other terms and conditions
- choose suppliers who are well qualified and financially sound and avoid suppliers who've engaged in unlawful or unethical conduct such as modern slavery or who could damage our reputation
- disclose to your manager any actual or potential conflict of interest or any personal relationship with a prospective supplier and record it on the conflicts register
- avoid any favour from a supplier or potential supplier which might create the perception of personal benefit to you from the choice of supplier.

To learn more:

- consult the *Conflicts management policy*
- consult the *Procurement policy*
- consult the *Modern slavery policy*
- talk to Governance, Risk and Compliance.



Manage conflicts of interest with integrity

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We're transparent about potential, perceived or actual conflicts of interest.

We must avoid conflicts or disclose conflicts of interest between Spirit Super and ourselves. We may, only upon approval from the CEO, accept a position with a business organisation outside of Spirit Super if it wouldn't impair our ability to fulfil our duties to Spirit Super and its members.

Watch out for:

- proposing a close friend or relative as a supplier or contractor and employer without disclosing interest
- doing work for a supplier
- allowing a supplier or contractor to do work for you whether paid or unpaid
- receiving gifts, entertainment or other favours from a supplier or contractor that could create the perception of improper influence
- processing a benefit for a close family member or friend.

Don't propose a company in which you have a financial interest as a supplier or contractor.

Make sure you:

- avoid conflicts of interest whenever possible and if you find yourself facing a potential conflict of interest, disclose it on the register and to your manager, Governance, Risk and Compliance or People and Culture
- don't do any outside work or accept any outside employment, leadership or directorship positions that could harm Spirit Super or be perceived to be in conflict with your duties at Spirit Super
- don't make false or misleading declarations during the performance of your position or when providing services on behalf of Spirit Super.

To learn more:

- consult the *Conflicts management policy*
- talk to Governance, Risk and Compliance
- consult the *Working at Spirit Super* handbook.

We use good judgement when giving or accepting gifts or entertainment

In the right circumstances a modest gift may be a thoughtful 'thank you' or a meal may be an appropriate setting for a business discussion that strengthens a supplier relationship. When not used with care, however, gifts and entertainment may create the perception of improper influence and may even be unlawful.

Watch out for:

- situations that could embarrass or compromise your integrity or our reputation, for example inappropriate entertainment venues
- regular meetings where a supplier or contractor pays
- festive periods
- entertainment including excessive consumption of alcohol.

Make sure you:

- don't give or accept any gift or entertainment unless it's legal, reasonable and free of intent or understanding or appearance that it will influence the business
- don't accept gifts during renew of contract or tender review process
- don't abuse the advantages of your position for private purposes.

To learn more:

- consult the *Conflicts management policy*
- talk to Governance, Risk and Compliance.

Safeguard our assets

We use our assets prudently.

We're entrusted with our assets and are personally responsible for protecting them and using them with care. Our assets include funds, facilities, records, equipment, information systems, intellectual property and confidential information.

Watch out for:

- sharing of passwords
- our assets left unsecured when not in use
- communications or internet use that could introduce viruses to, or breach firewalls of, our information systems
- use of unapproved software
- any use of our information systems in breach of policy e.g. downloads, file transfers etc.

Make sure you:

- only occasionally use our information systems for personal use
- don't use our equipment or information systems to create, store or send content that others might find offensive
- avoid any use of our assets that could harm those assets or cause loss
- ensure all transactions are fully and completely documented and recorded in the company's accounting records
- don't share passwords
- ensure your computer is locked when not in use.

To learn more:

- consult the *Information management framework – Information security policy*.



Building trust within the community

We're environmentally responsible

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We recognise our responsibility to conduct our business in a way that protects and improves the environment for future generations. We're committed to working with our suppliers to strengthen environmental stewardship and responsibility. We're committed to supporting our communities where our employees live and work, while also exploring ways to address broader challenges in society.

Watch out for:

- business practices that are an unnecessary use of natural resources
- not using the recycling bins appropriately
- your carbon footprint.

Make sure you:

- take personal actions such as turning off lights where possible, using less paper and recycling – small actions can make a big difference
- be vigilant to ensure we don't use more energy or water than necessary
- honour our values and uphold the standards in this code to ensure we always conduct our business ethically and in accordance with the law
- ensure outside activities don't interfere with our job performance or create a conflict of interest
- minimise your office products by using only what's necessary.

Communications

We show pride in our brand and understand the importance of accuracy and appropriate transparency in advertising and communications.

We've established policies for responding to enquiries from the media and other external parties legitimately seeking information about the company.

We truthfully and accurately represent our products and services to avoid misleading impressions in our member-facing communications. To be sure that we comply with the law and protect our interests, only employees who are specifically trained and authorised to do so are permitted to represent Spirit Super to the public or media.

Watch out for:

- posting and using information that's not publicly available
- assuming everything you write, exchange or receive on a social media site is private and non-permanent, it's not
- unintentionally writing or posting anything that may harm our reputation and brand.

Make sure you:

- don't make any unauthorised statements to the media about our business. Direct all enquiries from the press to the Strategic Relationships Manager
- are thoughtful in your communications both online and off
- use your best judgement and exercise personal responsibility. If you make a mistake, correct it quickly
- clarify on all posts, messages and similar social media communications that the views expressed aren't related to those of Spirit Super
- never lose sight of the fact that social media is public media – we think before we post
- abide by each social media platforms' rules and terms of use.

To learn more

- consult the *Media policy*
- consult the *Register of management delegations*
- consult the *Working at Spirit Super* handbook.

