



## Code of Conduct

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## 1 Introduction (A message from the CEO)

At the heart of the Code of Conduct is our purpose – ‘to support our members to prepare for financial freedom in retirement’.

Our Code of Conduct (**the Code**) helps to bring our purpose to life, providing a clear set of guiding principles so that we can all make a difference to our members by living our values. I’m proud of the culture we have built and continue to build at Equip Super, and our Code of Conduct is core to making sure this culture thrives.

Our Code sets the standards of behaviour, actions and decisions we expect. It helps us navigate difficult and complex situations, and to make good long-term decisions for our members, employers, fellow employees and the Group. The code also underpins our commitment to diversity and inclusion.

We have several internal policies and guidelines that complement the Code. You are required to comply with these policies and guidelines. If you ever come across a policy or guideline that doesn’t make sense to you, I’d encourage you to ask questions. We want everyone to understand why we need to follow certain standards, rules and behaviours. By following the Code, our Values, our Risk Management Principles and our key policies and guidelines, we can be confident that we are all making good decisions, serving our members and employers well and helping our communities prosper.

We sometimes face situations where we need to make difficult decisions. The Code helps guide our decision making so we can do what’s right in every situation.

The Code also sets clear boundaries for actions that are unethical and provides a roadmap for getting help when we run into unanticipated challenges. We are all accountable for adhering to our Code. Sometimes you may struggle with a decision or it may not be clear what to do. When that happens, ask your people leader or speak with the Governance and Risk team.

Despite our best efforts, we know there will be occasions when we get things wrong. When this happens, we need to act with transparency and put things right; quickly and fairly. We need to reflect on and learn from our mistakes, continually seek ways to improve, and understand the consequences when our actions don’t meet the standards of our Code.

On its own our Code is just words on paper. But by following our Code, we can turn it into action and continue to build the culture of Equip Super.

**Scott Cameron**

**Chief Executive Officer**

### Acknowledgement of Country

In the spirit of reconciliation, we acknowledge the Traditional Custodians of country throughout Australia and their connections to land, sea, and community. We pay our respect to their Elders past and present and extend that respect to all Aboriginal and Torres Strait Islander peoples today. We acknowledge and value Australian Aboriginal and Torres Strait Islander cultures and knowledge.

### 1.1 Purpose & objectives

We are proud of our reputation as an ethical and professional company that aims to achieve the highest standards in everything it does. The objective of the Code is to provide a framework that enables our people to conduct themselves transparently and be fully accountable through our licensing and regulatory obligations and to the wider community. To do this successfully, every director, employee and contingent worker needs to act with the highest standard of integrity and honesty, in the best financial interests of the beneficiaries of the Fund and TFP Advice Clients.

The Code outlines how this might be achieved in practice. It’s a tool aimed at helping our people understand how we want to operate.

It is critical that we all understand and comply with the Code – both the words and the spirit in which it is intended.

This purpose of the Code is to complement, rather than displace any other applicable legal or policy requirements and should be read in conjunction with all other Group policies (**Policies**). To the extent there is any inconsistency

between the Code, Policies or legal obligations that cannot be reconciled, you should meet your obligations in the following order of priority:

- Legal and regulatory obligations;
- Relevant industry codes;
- The specific Policies; and
- The Code.

## 1.2 Who does the Code apply to?

The Code of Conduct (the Code) applies to everyone engaged by the Group, i.e. all directors, employees and contingent workers of the Trustee, as Trustee of the Equipsuper Superannuation Fund (the Fund) and its related party entities Togethr Financial Planning Pty Limited (TFP) and Togethr Asset Management Pty Ltd (TAM), individually a Group Entity, and collectively the Group Entities or the Group, in their respective capacity as:

- Trustee of the Fund;
- product issuer and distributor;
- provider of advice to Members and Clients; and
- investment management services on behalf of the Fund.

It applies to you whenever you are representing the Group or undertaking work on its behalf. At times, you may be doing this outside our offices or outside working hours, but the Code still applies on these occasions.

## 1.3 Values

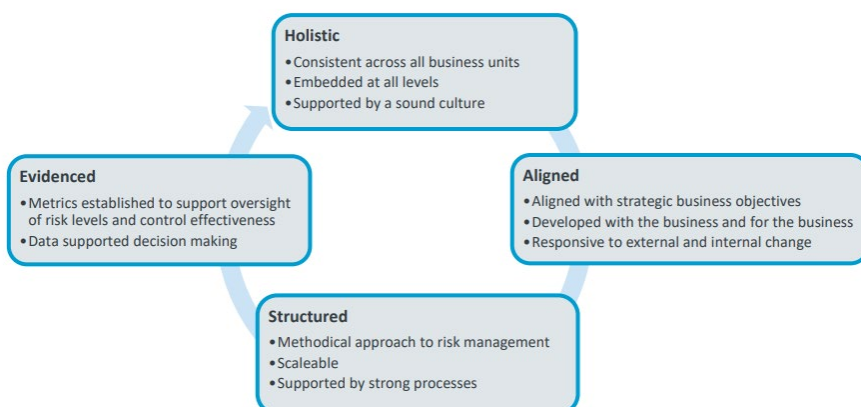
Our values establish the way we work. They underpin all we do by providing a consistent framework for how we do business and help us make reliable, unbiased decisions that will stand up to scrutiny.

Value	What we do	What we don't do
<b>Members first</b> we act in the best financial interests of our members	Ask	Assume
	Act lawfully, ethically and fairly and in the best financial interests of our members	Forget to consider impact to members when making business decisions
	Get it right the first time or fix it	Leave issues unresolved
	Put our members needs first every time	Refuse to advocate for our members
	Balance service, cost and performance for the right outcome	Focus only on one factor at the expense of the others
<b>Accountability</b> we do what we say we'll do	Do what we say we will	Delay taking action
	Do what's right, even when its hard	Say "it's not my job"
	Accept responsibility for, and learn from, our mistakes	Hide our mistakes or blame others
	Speak up and escalate when we have concerns	Ignore concerns
	Focus on high quality outcomes	Tolerate non-delivery or poor-quality work
	Be proactive, think ahead and address issues early	Wait for a crisis or wait for others to find a solution
	Ensure all risk and compliance obligations are met	Ignore our obligations

Value	What we do	What we don't do
<b>Respect</b> we care about each other and act with integrity and honesty	Act with honesty and integrity	Act in a way that is dishonest or unethical
	Speak honestly and supportively and stand up for what is right	Avoid difficult conversations or look the other way
	Value the time and opinions of others	Be disrespectful of others' time and dismiss their opinions without consideration
	Care about each other, act with empathy and compassion	Disregard the needs of others
	Call out poor, inappropriate or disrespectful behaviour	Ignore (or tolerate) poor behaviour
	Value and appreciate the contribution and achievements of others – we give credit where credit is due	Ignore the contributions of others or take credit for the work of others
<b>Collaboration</b> we work together to achieve results	Work together in partnership to get things done	Operate in silos
	Communicate openly and honestly	Fail to keep others informed
	Share information, insights, mistakes and lessons	Keep information to ourselves or move on without learning
	Challenge constructively and positively	Challenge inappropriately
	Work as one team and embrace inclusion	Play favourites or ignore the opinions or experience of others
	Be interested and responsive to others' ideas	Be closed minded or not seek additional input

## 1.4 Risk Management Principles

Risk is being managed everyday by our people at all levels. The active identification and management of risk enables us to respond quickly to opportunities and to re-focus effort if required. Our Risk Management Principles are embedded in our Risk Management Framework.



## 2 Living our Code

The Code sets out the expectations we have for how we operate, solve problems and make decisions.

Our members, employers and communities trust us to act with integrity and professionalism. Our Code of Conduct outlines how we do things at Equip Super and describes the standards of behaviour we set for ourselves and each other. The Code connects our Purpose, Values and our key group policies and guidelines to help us to deliver the right outcomes to our members, employers, colleagues, and other stakeholders.

Every one of us must live by the Code. It applies to all employees, board directors and contingent workers. No one is exempt. And it applies to how we interact with everyone we encounter, both at work and outside of work – colleagues, members, employers, regulators, government, business partners, suppliers, competitors, and the wider community.

### 2.1 What do we expect of you?

As a director, employee or contingent worker of the Group, we expect that you will (as a non-exhaustive list):

- act in the best financial interests of the Beneficiaries of the Fund and TFP Advice Clients;
- prioritise the interests of, and duties owed to, the Beneficiaries of the Fund and TFP Advice Clients, over and above those owed to any other party;
- act respectfully, fairly, honestly and professionally when engaging with all stakeholders of the Group;
- act with the highest ethical standards and not engage in any activity or behaviour that could be construed as improper or inappropriate, or damage the reputation of the Group;
- foster a safe, healthy (mentally and physically) and productive work environment;
- maintain the confidential information of the Group, the Beneficiaries of the Fund and the TFP Advice Clients;
- recognise and prevent improper use or perceived improper use of the Group's Inside Information; and
- ensure that your behaviours and actions comply with the Group and/or Trustee policies, values and ethical framework, together with relevant laws and regulations.

In addition to the above standards, directors must also:

- exercise due care, skill and diligence in fulfilling the duties of a director; and
- exercise independent judgement regarding all matters to be considered by the Board.

### 2.2 What can you expect from Equip Super?

We will support compliance with the Code by:

- Setting clear and consistent expectations that everyone must adhere to the Code and behave in a way consistent with our values.
- Supporting you, by listening and respecting your views and perspectives, when you speak up about concerns.
- Providing safe avenues and formal processes to raise issues without fear of reprisals when you speak up.
- Providing guidance on decision-making including when navigating tough situations.
- Ensuring fair and proportionate consequences are consistently applied to people who do not adhere to this code.

### 2.3 What are the consequences of non-compliance?

Everyone needs to be aware of and comply with the Code in carrying out their duties. Breaches of the Code are taken very seriously.

In the case of directors (other than the Trustee Board Chair), breaches of the Code will be escalated to the Trustee Board Chair who will determine an appropriate action plan or disciplinary action. If the Trustee Board Chair breaches the Code, the matter will be jointly referred to the Chairs of the Governance and Culture Committee

(GCC) and the Audit and Finance Committee (AFC) who will determine the appropriate action plan or disciplinary action.

In the case of employees and contingent workers, following the Code is mandatory and a condition of your employment or engagement within the Group. If you fail to comply with the Code, you may face serious consequences ranging from coaching and counselling so you can learn from your mistakes, up to and including dismissal for serious breaches of the Code.

No disciplinary action will be taken until after the breach has been investigated and the individual concerned has had an opportunity to comment.

### **3 How to use the code**

Use the Code to help you to do the right thing, including when faced with tough decisions, or when you aren't sure what to do. Each of us must take personal responsibility to follow the Code and to question if something doesn't seem right or doesn't reflect our Values and to take action to put it right.

#### **3.1 Making good decisions**

The Code aims to provide a guiding set of principles for our behaviour, actions and decisions. If you are unsure of what the Code implies, ask yourself:

- Am I acting in accordance with our Values and our Policies?
- Am I acting lawfully, ethically, fairly, honestly and with integrity?
- Does this feel like the right thing to do?
- Could this cause harm to anyone?
- Does this consider specific member circumstances?
- Am I proud of what I am doing?
- In the long term, is this likely to be a positive outcome for the Group, its people and its members?

If you are still not sure what you should do, reach out to your people leader or the Governance and Risk team for support and guidance.

### **4 Speaking up and getting support**

The decisions we make impact everyone including our members, employers, colleagues, and the community – so we need to make sure we are heading in a direction we can be proud of, both individually, and as a collective.

While working here, you might come across something that doesn't feel right to you. If you're ever concerned something may be illegal, unethical, unacceptable or improper, speak up honestly and constructively about your concerns. Breaches of the Code should be reported in accordance with our Whistleblower Protection Policy.

We know this takes courage, but we are committed to having a workplace where all team members feel safe to share their different perspectives in their approach to work. We're here to support each other, and there is no tolerance for anyone who retaliates against a colleague for speaking up.

Even if you're not sure about the situation, your concern is enough to start the conversation. If you are unsure of what to do, you can ask for support from your people leader or the Governance and Risk team. Anything we share will be treated with respect and confidentiality.

#### **4.1 Whistleblower protection**

We will protect our directors, employees and contingent workers who, in good faith, draw attention to illegal or unethical practices in accordance with our Whistleblower Protection Policy. It is the responsibility of all of us to report instances of illegal or unethical conduct, or a breach of the Code, and those who do so in good faith will not be disadvantaged.

## 5 Our members, clients, employers & communities

When making decisions that affect our members, clients, employers and communities, consider our Values and refer to the key group policies and guidelines to achieve the expected outcomes listed below.

### 5.1 Outcomes

- Providing financial services is a privileged role, requiring a high level of trust and ethical behaviour. We only provide products and services that are right for the Beneficiaries of the Fund and TFP Advice Clients and match their needs and circumstances.
- Fair and ethical member and client outcomes are at the heart of our plans, decisions and actions.
- Our products and services are fair, transparent, and meet member and client needs, and our distribution approach is appropriate for members and clients.
- Member and client interactions are consistently high-quality experiences.
- All employees complete learning and competency requirements, and only operate in roles for which they hold the required accreditations.
- We are compassionate to the circumstances of members and clients, including those who are most vulnerable.
- The potential for unfair outcomes is proactively identified, and complaints and issues are managed in a timely manner.
- Member and client complaints, pain points and harm – including financial losses, distress and inconvenience – are promptly and appropriately addressed and, where appropriate, remediated.
- Market manipulation, insider trading, failure to manage conflicts of interest, bribery and corruption or inappropriate control, sharing and use of confidential or personal information are not tolerated.
- We recognise that environmental and social risks can impact our communities and we are committed to ensuring these risks are identified and managed appropriately.
- We value our external relationships with all stakeholders and want those relationships to be based on mutual trust and respect.
- The standards in our policies and practices ensure fair member, client, employer and community outcomes and that the spirit, as well as the letter, of regulations are adhered to.

### 5.2 Key policies and related documents

- Financial Advice Framework
- Complaints Handling Policy
- Vulnerable Members Policy
- Member Outcomes Policy
- Representative Monitoring and Supervision Policy
- Diversity, Equity and Inclusion Policy
- Representative Training and Continuing Professional Development (CPD) Policy
- Investment Governance Framework
- Investment Risk Management and Stress Testing Policy
- Responsible Investment Policy
- Responsible Manager Policy

## 6 Our people

The Group strives to conduct its business with the highest standard of integrity and expects all directors, employees and contingent workers to maintain these high standards.

Our people are key to achieving fair and sustainable outcomes for members, clients, employers, communities, and everyone at Equip Super. When making decisions that impact our people, consider our Values and refer to the key group policies and guidelines to achieve the expected outcomes listed below.

### 6.1 Outcomes

- We're committed to maintaining a diverse and inclusive culture where all team members are treated fairly, respectfully and feel psychologically safe to speak up and share their different views and perspectives.



- We promote a culture and workplace environment that supports both the physical and psychological health and wellbeing of our people..
- We take a zero-tolerance approach so that no one experiences unlawful discrimination, bullying or harassment — including sex-based harassment, sexual harassment or racism.
- We advise People and Culture if we become involved in a personal relationship where there is a direct reporting relationship, or one which may compromise the integrity of your work, or you feel your working situation is impacted in a negative or positive way, e.g., you are feeling unsafe or uncomfortable at work.
- People are only hired, promoted and rewarded when they demonstrate the highest behavioural standards and our decisions are based on fair and objective decision making.
- Our members and clients know they are in safe hands. This is because we only act within our authority and carefully consider what's in the best financial interests of the beneficiaries of the Fund and TFP Advice Clients.
- We act within our authority, and use Group technology, other assets and social media responsibly.
- We complete the training and learning, and competency requirements, and hold any accreditations required for our role.
- We do not compromise the integrity of the Group or its stakeholders. Any conflicts or perceived personal conflicts of interest, criminal convictions or charges are declared.
- We are recognised and rewarded for driving long term, sustainable outcomes, while adhering to sound risk management and governance principles.

## 6.2 Key policies and related documents

- Flexible and Hybrid Work Policy
- Leave Policy
- Organisational Change and Redundancy Policy
- Remuneration Framework and Policy
- Performance Framework
- Leadership Framework
- Respect at Work Policy
- Diversity, Equity and Inclusion Policy
- Occupational Health and Safety Policy
- Whistleblower Protection Policy
- Employee Guides:
  - Complaints Management Process
  - Learning and Development
- People Leaders' Guides:
  - Living the Values
  - Leading at Equip
  - Managing Performance
  - Difficult Conversations
  - Receiving and Managing Complaints
  - Developing your Team
  - Recruitment

## 7 Governance, compliance & risk

When making decisions that affect how we manage and govern risk and compliance obligations, consider our Risk Management Principles, our Values and refer to the key group policies and guidelines to achieve the expected outcomes listed below.

### 7.1 Outcomes

- We meet our legal and regulatory obligations, and internal policies and standards.
- We read and attest to the understanding of the contents of policies prescribed for us as required.
- We maintain a Fit and Proper Policy in accordance with the APRA Prudential Standard SPS 520.

- We maintain an accountability framework in accordance with our obligations under the Financial Accountability Regime (FAR).
- The best financial interests of the beneficiaries of the Fund and the TFP Advice Clients are a critical component of decision making.
- Privacy, including our member and client's privacy, is respected and personal information and data is kept secure and used responsibly in line with our legal obligations and information security principles.
- We have a zero-tolerance policy to fraud, attempted fraud, or concealment. Anyone who chooses to ignore or cover up the improper conduct of another person may be considered to have assisted in committing the fraud and/or offence. Those involved will be subject to disciplinary measures, up to and including termination, investigation by the applicable regulator and potentially a police investigation.
- Our policies and standards explain how to identify, manage and control the risks of financial crime (including anti-money laundering and counter-terrorism financing), bribery and corruption or sanctions breaches as well as commercial and personal conflicts of interest.
- We understand our obligations in relation to the transparent management of gifts, benefits and hospitality that are received directly or indirectly in connection with our roles at the Group.
- We exercise caution in any personal relationships with stakeholders to ensure they do not involve obligations that may prejudice or influence our business relationship or conflict with our duties at the Group. This includes establishing ongoing business arrangements with them in a partnership or as a director of a company.
- Only the Trustee Board Chair, CEO, Chief Investments Officer (CIO) and Chief Experience Officer (CXO) are authorised to make public statements on behalf of the Group. No director, employee or contingent worker is authorised to make a statement to the media without first obtaining the approval of the Trustee Board Chair, CEO or CXO.
- We do not contribute funds to any political party, politician, elected official or candidate for public office. With the prior approval of the Trustee Board Chair, directors may attend political events or activities for the purposes of providing a business briefing on behalf of the Group.
- We use clear delegation frameworks for decision making to support our governance, risk management and compliance frameworks.
- Our governance arrangements support good decisions and outcomes that align with this Code, our Risk Management Framework, and Risk Appetite Statement.

## **7.2 Key policies and related documents**

- Risk Management Framework
- Compliance Management Framework
- Conflicts Management Policy
- Improper Use of Inside Information Policy
- Privacy Policy
- Information Security Framework and Policy
- Data Governance Policy
- Gifts, Benefits and Hospitality Policy
- Fraud Policy
- Information Security Framework and Policy
- Fit and Proper Policy
- Financial Accountability Regime (FAR) Framework and Policy
- Expenditure Policy
- Incident and Breach Management Policy
- Anti-Money Laundering and Counter-Terrorism Financing (AML CTF) Program – Part A and Part B
- Sponsorship Framework
- Australian Financial Services Licence (AFSL) Policy
- Acceptable Use standard

## 8 Role of people leaders

Our leaders should personify the Code in everything they do, acting as role models while encouraging and supporting others to do the same. They're also responsible for creating an environment where everyone feels comfortable to ask for help when they need it, is prepared to learn from mistakes, and will speak up when something doesn't seem right.

As a people leader we expect you to:

- Role model and reinforce our values while simultaneously holding people accountable.
- Role model inclusive leadership enabling a culture where our people feel safe, respected, and can thrive.
- Set clear objectives and expectations that decisions are made ethically and follow up to make sure the right practices are being followed.
- Coach and develop your team's skills by providing timely and objective feedback that is linked to performance objectives.
- Role model ethical decision making and explain to your team how you have worked through complex situations where the right choice wasn't necessarily clear.
- Consider Risk Outcomes and Behavioural Standards (including compliance with the Code) when assessing performance and recommending remuneration outcomes.

## 9 Reviewing the Code

The Chief People Officer (CPO), with the support of Management, is responsible for undertaking reviews of the Code. Following the CPO's review, changes to the Code will be presented to the Governance and Culture Committee (GCC) for consideration and recommendation to the Trustee Board for approval.

The Code will be reviewed at least annually, and will be reviewed more frequently in the event of one of the following triggers:

- if there is a significant change in the business or in any significant part of it;
- when there is a significant change in legislation or regulatory requirements that are relevant to the Code; and
- at any other time determined by the GCC or the Board.