

Vision Super Pty Ltd

ABN 50 082 924 561

Code of conduct

Strictly confidential

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Contents

Code of conduct	1
STATEMENT OF POLICY	3
Expected and Unacceptable Behaviours	4
Expected behaviours:	4
Unacceptable behaviours:	4
Code of conduct guidelines	4
Values	4
Transparency and Accountability	4
Honesty, propriety and integrity	5
Personal and professional behaviour	5
Behaviour outside hours of duty	6
Respectful workplace behaviour	6
Discrimination	6
Harassment	6
Sexual Harassment	6
Bullying	7
Reporting misconduct	7
Use of alcohol or drugs	7
Integrity and Professional Conduct	7
Gifts and hospitality	7
Use of confidential personal and commercial information	7
Conflict of interest	8
Privacy	8
Acceptable Use of Technology and Social Media	8
Contractual Obligations	9
Wellbeing and Support	9
Workplace Health and Safety	9
Employee Counselling and Disciplinary	9
Breach of the Code	9

STATEMENT OF POLICY

The purpose of the Code is to promote a culture of integrity, accountability, and respect, ensuring that our actions reflect our values and support the trust placed in us by members, colleagues, and the wider community. It also helps employees understand their responsibilities, including how to act in line with company policies, legal obligations, and professional standards.

This Code sets out the minimum behavioural standards (conduct) required of all Directors, consultants 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 Chief Executive Officer (CEO), the HR team 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:

- [Fit and proper policy](#)
- [Employee counselling and disciplinary policy](#)
- [Social media policy](#)
- [Respectful workplace policy](#)
- [Work health and safety policy](#)
- [Use of Vision Super systems and technology](#)
- [Conflicts management policy](#)
- [Fraud and corruption control system](#)
- [Governance and policy framework](#)
- [Privacy policy](#)

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

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, HR team or Vision Super's independent external whistle-blower service, currently Your Call:

- 1300 790 228 business days between 9.00am to 12.00am
- <https://whistleblowing.com.au/> or www.your-call.com.au
- Quote code: **VISS1947**
- Refer to our [Whistleblower Policy](#).

Expected and unacceptable Behaviours

Expected behaviours include:

- Adherence to company values
- Follow applicable laws, policies and procedures
- Be inclusive and considerate of diverse backgrounds
- Communicate honestly and openly
- Treat others with respect, dignity and fairness

Unacceptable behaviours include:

- Harassment, discrimination, or intimidation in any form
- Abusive, threatening or demeaning language or behaviour including physical or verbal abuse
- Dishonesty

Code of conduct guidelines

Values

At Vision Super, our values guide our actions, shaping the way we work together and serve our members. They provide a framework for professional conduct and create a foundation of trust, transparency and accountability. Employees are expected to embody these values in all they do at Vision Super:

- **Trust** - We take ownership of our work and build confidence through transparency and reliability. We uphold our commitments, communicate openly, and hold ourselves and each other to high standards of professionalism.
- **Care** - We work together, fostering an inclusive and respectful workplace where diverse perspectives are valued and encouraged. We support one another's success and wellbeing, recognising that collaboration strengthens our impact and drives meaningful outcomes.
- **Commitment** - We are dedicated to delivering the best outcomes for our members and each other. We embrace learning, feedback and innovation. We continuously evolve how we work to improve efficiency, effectiveness and service excellence.
- **Citizenship** - We act with purpose and integrity, considering the broader impact of our decisions on our members, colleagues and community. We take responsibility for contributing to a positive, ethical and sustainable workplace and industry.

Transparency and Accountability

We foster a culture of trust by embracing ownership, honesty and leadership at all levels. Transparency and accountability are fundamental to how we work, ensuring that we operate with integrity, reliability and a shared commitment to excellence.

- **Own it & fix it** – We take responsibility for our actions and the outcomes of our work. When challenges arise, we address them proactively, seek solutions, and continuously improve. We do not pass blame; instead, we focus on learning and problem-solving to drive positive results.
- **Be open & honest** – Clear, honest communication is essential to building strong relationships and effective teams. We share information openly, provide constructive feedback, and engage in meaningful conversations that foster trust and collaboration. We value different perspectives and create space for respectful, two-way dialogue.
- **Lead by example** – Every team member, regardless of role, has a responsibility to model integrity and accountability. By consistently upholding our values, making ethical decisions, and taking ownership of our impact, we set the standard for others and contribute to a positive, high-performance workplace.

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 Head of HR, the Chief Risk Officer (CRO), 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 member 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 Head of HR, the CRO, the CEO or the Chair, as appropriate.

You must not insider trade. Please refer to the Switching investment options

- If engaged in investment activities, you must not accept out of market prices without the prior authorisation of the Chief Investment Officer (CIO), or the CEO, or the Chair of the Board, as appropriate.
- You must take all reasonable steps to guard against the falsification or unauthorised destruction of any document or record.

Out of hours conduct

- 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.

Respectful workplace behaviour

Vision Super values diversity and promotes a workplace that actively seeks to include, welcome and value contributions of all people. Vision Super is a safe, friendly working environment that is free of any form of discrimination, harassment or bullying.

All Vision Super employees are required to follow the [Respectful workplace policy](#) and do not engage in behaviour that could constitute bullying, discrimination or harassment; Vision Super employees shall treat others with dignity, courtesy and respect.

This section provides a brief overview of inappropriate behaviours in the workplace, as outlined in our Respectful workplace policy. For more information on these topics, please refer to the Respectful workplace policy, or contact the HR team.

Discrimination

Discrimination means a person is treated unfavourably, or disadvantaged, because of a characteristic or attribute they have. Australian and state law prohibits discrimination against a person or group because they have a particular characteristic or “protected attribute”. For a list of these protected attributes, please refer to our Respectful workplace policy

Harassment

Harassment can be against the law when a person is treated less favourably on the basis of certain personal characteristics, such as race, sex, pregnancy, marital status, breastfeeding, age, disability, sexual orientation, or gender identity.

Harassment can include behaviour such as:

- Telling insulting jokes about particular racial groups
- Sending explicit or sexually suggestive emails or text messages
- Displaying racially offensive or pornographic posters or screen savers
- Making derogatory comments or taunts about someone’s race
- Asking intrusive questions about someone’s personal life

Sexual Harassment

Sexual harassment occurs when someone:

- Makes an unwelcome sexual advance
- Makes an unwelcome request for sexual favours
- Engages in other unwelcome conduct of a sexual nature

For a person to have sexually harassed someone, it has to be reasonable to expect that in the situation, there is a possibility that their behaviour would offend, humiliate or intimidate the other person. As with unlawful discrimination, the intent of the person doing the action is not relevant.

Bullying

Workplace bullying is repeated, unreasonable behaviour, directed at an employee, or group of employees, that creates a risk to their physical or mental wellbeing. Reasonable management action, conducted in a reasonable (respectful) manner, is not bullying.

Workplace bullying can take two forms: overt bullying, which involves verbal abuse and/or physical violence; or covert bullying, which can be more subtle and involve things such as embarrassing or degrading work demands.

Reporting misconduct

If any form of workplace misconduct is experienced or witnessed, the HR team should be immediately notified, in accordance with the Respectful workplace policy

Respectful workplace policy.

A member of the HR team, in consultation with the person making the complaint, will discuss actions to address their concerns. Vision Super is responsible for determining and carrying out the most appropriate process to respond to a complaint.

A matter may be dealt with initially using an informal process, and later change to a formal process, or vice versa. Employees have a range of reporting options, both informal and formal, and external or internal for resolving complaints.

For further information on making a complaint, please refer to the Respectful workplace policy | Respectful workplace policy

Victimisation

Vision Super is committed to providing a safe and respectful working environment, free from any form of Victimisation.

Victimisation occurs when an employee or group of employees, are treated unfairly or subjected to disadvantage because they have:

- Made a complaint or raised a concern, whether formally or informally, about discrimination, harassment, bullying or other inappropriate conduct;
- Supported someone in making such a complaint;
- Participated in an investigation or dispute resolution process related to such a complaint.

Victimisation of another person can include but is not limited to:

- Intimidation, threats or retaliation;
- Denying opportunities or assigning undesirable task;
- Excluding someone from workplace activities or communication.

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 adversely affect your behaviour or your ability to work, you must inform your manager and/or HR team, or the Chair of the Board if you are a director.

Integrity and Professional Conduct

Gifts and hospitality

All directors and employees must disclose any gifts, entertainment, travel, or benefits received from current or prospective service providers. All offers must be recorded in the Gifts and Entertainment Register, except for low-risk items like coffee, minor promotional goods, or incidental hospitality at professional events. Cash gifts must never be accepted. Approval from the CEO or Chair is required before accepting tickets to events. No gifts or hospitality should be accepted from suppliers involved in a current tender.

For more information and helpful guidance on this topic, you can refer to the Conflicts management policy

Use of confidential personal and commercial information

Employees must protect all confidential, personal, and commercially sensitive information accessed during their employment. This includes member data, financial details, and internal records. Such information must not be disclosed or used for personal gain, during or after employment. Any misuse, including insider trading or seeking personal advantage, is prohibited and will be subject to legal consequences.

Conflict of interest

Employees and Directors must avoid situations that conflict, or appear to conflict, with their duties at Vision Super. Outside employment or business activities require written approval (from the CEO for employees, or the Chair for Directors). Private interests must never influence work responsibilities. Any personal, financial, or business relationship that may affect impartiality must be disclosed and managed according to the Conflicts Management Policy.

All Employees must advise the CRO or HR as soon as they become aware of any circumstance that gives rise to a conflict or potential or perceived conflict, either for them personally, or for any entity within the group. The CRO will record the conflict on the Conflicts Register. Conflicts relating to Employees who are not responsible persons are not required to be publicly disclosed on the Vision Super website.

Further guidance on how to identify and report a conflict (including the disclosure of gifts and entertainment) is available on the Hub.

For more information and helpful guidance on this topic, you can refer to the Conflicts management policy

Privacy

It is essential that all employees treat private information with care, not only to comply with legal obligations, but also to maintain the trust of our members and stakeholders, and to protect the integrity and reputation of Vision Super. Please refer to the Privacy policy.

Acceptable Use of Company Resources, Technology and Social Media

Employees must use Vision Super's systems and technology responsibly and for business purposes only. All data and communications on these systems remain the property of Vision Super. To protect the organisation, its members, and partners, users must avoid unlawful use, respect privacy and security protocols, and prevent unauthorised access. Communication should always be courteous and professional. Breaching or attempting to bypass security measures may result in disciplinary action.

For more information and helpful guidance on this topic, please refer to the Use of Vision Super Systems and Technology policy.

Contractual Obligations

Employees must respect the terms of their employment contract, both during and after their time at Vision Super. This includes any post-employment restraint clauses, which may limit certain work or business activities for a defined period to protect Vision Super's legitimate interests.

All intellectual property created or contributed to in the course of employment remains the property of Vision Super. Employees must not use or disclose confidential information or intellectual property for personal gain or for the benefit of another employer or business.

For further information on your obligations, please refer to your employment contract.

Wellbeing and Support

Vision Super offers support in the form of wellbeing programs for all employees and their immediate families throughout their employment and up to three months after their employment ends with Vision Super. Our Employee Assistance Program details is available to all employees and their immediate families 24 hours a day, 7 days a week.

For more information and helpful guidance on this topic, you can refer to the hub.

Workplace Health and Safety

Vision Super recognises that work health, safety and wellbeing are vital to the welfare of our people, and the success of our business. We strive to achieve the highest standards of work health and safety by developing cooperative, consultative relationships with all employees. We are dedicated to continually improving our health and safety performance with an objective to eliminate or, where this is not reasonably practicable, to reduce risks to health and safety for all Vision Super employees, contractors and members of the public. We are committed to providing a workplace that has a positive focus on health and wellbeing for all.

For more information and helpful guidance on this topic, please refer to the Work Health and Safety policy

Employee Counselling and Disciplinary

The employee counselling and disciplinary policy provides guidance on the approach that Vision Super takes to address unsatisfactory work performance or conduct/behaviour. This policy does not replace communication and feedback that occurs on a regular basis between a manager and an employee. This includes one on one meetings and the performance review process.

Compliance and Breach of the Code

All employees and representatives of Vision Super are expected to understand and comply with this Code of Conduct, where relevant. Breaches of the Code - whether through action or omission may result in disciplinary action, up to and including termination of employment or engagement. Serious breaches may also lead to legal action or referral to the appropriate authorities.

If you are uncertain about how the Code applies in a specific situation or believe a breach has occurred, you are encouraged to raise the matter with your manager, the Head of HR, or through an approved reporting channel.

Vision Super will handle all reports of potential breaches fairly, promptly, and in accordance with relevant policies, while maintaining confidentiality and protections against retaliation.

For further guidance on our disciplinary process, please refer to the Employee counselling and disciplinary policy and or the Consequence Management Framework.