

Suncorp's Code of Conduct

Doing the right thing, being courageous, caring for others.



SUNCORP



Suncorp Group Limited
ABN 66 145 290 124



Our Code of Conduct helps us make the right decisions and do the right thing for our customers and stakeholders.

At Suncorp, we are committed to making a positive difference for our customers, our people and the communities where we live and work. I am incredibly proud to lead an organisation where our culture has been shaped by a long and proud history of helping our customers in Australia and New Zealand. For over 100 years, we have developed a unique spirit that binds us together and differentiates us.

Suncorp's purpose is 'building futures and protecting what matters'. Our Code of Conduct brings that purpose to life, guiding our people and those who represent us. It helps us make the right decisions and do the right thing for our customers and our stakeholders, every day. It's more than just the principles by which we operate, it's about building trust and confidence, and the behaviours that deliver brilliant experiences for our people and our customers.



Suncorp's purpose is supported by a set of core principles which inform our behaviours and help us to create unique experiences for each other and our customers.

These principles are;

- **Doing the right thing**
- **Being courageous**
- **Caring for others**

Together, the Code of Conduct and our core principles reflect the unique culture of Suncorp and are an essential part of working with us.

- Steve Johnston,

Group CEO

Suncorp's Code of Conduct | 2

Living our Code

How do I use our Code?

Our Code of Conduct is designed to be easy to follow. However, there may be times when you're not clear if you're following it. If in doubt, ask yourself:

- Might this break a law or a policy — is this legal?
- Is what I'm doing adhering to Suncorp policies, standards, guidelines and procedures?
- Does this feel like the right thing to do?
- Will this potentially cause harm to anyone?
- Would my colleagues and customers say I am acting fairly, ethically and with integrity?
- Would my family and friends be proud if I shared with them what I was doing?
- In the long term, is this likely to be a positive outcome for Suncorp, its people and customers?

Who does the Code apply to?

Our Code applies to all employees, contractors, officers and directors within Suncorp. In addition, anyone representing or working with us including; partners, agents, suppliers and intermediaries are also encouraged to adhere to the expectations outlined within the Code.

Our Code applies whenever you represent Suncorp, including outside of the office. It also applies to behaviours which might cause damage to our reputation inside and outside of office hours.

What happens if I breach or ignore our Code?

Suncorp values and rewards exemplary behaviours, and we are also serious about managing misconduct. We are all expected to follow our Code and if you don't, you will face consequences up to and including formal warning and termination of employment. We are committed to maintaining a strong link between conduct, performance and remuneration outcomes by ensuring misconduct is met with appropriate consequences. If you're an associate, supplier or partner of Suncorp, we may ultimately choose to end our business relationship with you if you're in breach of our Code.

Who do I contact to report something?

To report a concern, raise the matter with your leader in the first instance. If for any reason this is not possible, please talk to your leader-once-removed. If you're still concerned, please contact **People Connect** on **1800 188 833 (AU)** or **09 363 8376 (NZ)**. Alternatively, you can contact the **Suncorp Whistleblower Service** on **1800 444 774, New Zealand** on **0800 202 643, International** on **+61 3 9667 3727** (international call rates apply) or by emailing **suncorp@deloittedigital.com**. You can also report suspected cases of internal fraud by contacting **Group Internal Fraud** in Australia **1300 182 442** and New Zealand **0800 451 773** or email **InternalFraud@suncorp.com.au**.

Doing the right thing

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We are committed to always doing the right thing, by conducting ourselves honestly and fairly in all situations.
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We are fair

We act in good faith and in the best interests of Suncorp and our customer at all times and are committed to finding solutions for our customers, and balancing the needs of stakeholders, including risk considerations. We do this by:

- Acting ethically and striving to solve customers problems and meet their needs.
- Providing products and services that are accessible, inclusive, fit for purpose and provided in a fair and ethical manner.
- Operating within our risk appetite to look after the long-term financial viability of the business, offering real value for money, delighting our customers with great service, and making sure Suncorp creates value for all our stakeholders.

We are honest and transparent

We never behave in a way that's dishonest, illegal, fraudulent, corrupt or unethical, and comply with disclosure obligations imposed by law. We do this by:

- Never offering, accepting, soliciting or paying a bribe or facilitation payment.
- Never using confidential information for personal gain (or for the gain of others), including never engaging in anti-competitive practices, money-laundering and/or insider trading/dealing.

- Complying with all contractual obligations and other undertakings without attempting to evade or delay compliance.
- Ensuring the disclosure of material information in a clear, timely, balanced and transparent manner.
- Ensuring access, use and disclosure of personal, confidential, sensitive or privileged information is authorised and only used for work purposes.
- Managing conflicts of interest effectively by reporting potential, perceived and actual conflicts of interest to our leaders and identifying suitable management actions.

We follow the rules

We comply with all relevant industry codes of practice, rules for bodies that regulate the industries we're involved in and carry out our work in accordance with Suncorp's internal policies, standards, and procedures.

We do this by:

- Completing all required training and education programs relevant to our roles to ensure we understand and comply with all relevant laws, regulations, industry codes of practice, contractual obligations, policies, standards, guidelines and procedures that apply to us and the work we do.
- Accepting that managing risk is everyone's responsibility, with leaders focusing on supporting their team members to mitigate those risks that matter the most.
- Using business assets and resources in an appropriate and responsible way, and only for legitimate business purposes.
- Ensuring our work is always done diligently and with care, being personally fit to perform duties at all times, unimpaired by drugs, alcohol or other substances.
- Respecting the privacy of everyone we come into contact with and protecting the security of any confidential, privileged or personal information we handle.
- Following the laws and industry codes of practice around the protection and disclosure of information.



Being courageous

We strive to be our best, we speak up when it's needed most and take ownership of our actions.

We strive to be our best

We embrace thinking big and challenging the status quo where improvements can be made for our customers, people, shareholders and community. We do this by:

- Making it easy for customers to deal with us by making the complex simple and finding appropriate solutions to meet their needs.
- Acknowledging we will not always get it right and have a tolerance for failures or mis-steps that fall within our risk appetite.
- Learning from our mistakes and taking prompt action to resolve them and ensure the same issues aren't repeated for other customers.
- Always seeking better ways to do things, to create brilliant outcomes for our customers and each other.
- Regularly reviewing and improving our products and services to ensure they remain of value to our customers.

We speak up

We make it easy and safe for our people to raise concerns as soon as they notice something is not right or could be improved.

We do this by:

- Encouraging and supporting the appropriate raising of misconduct and inappropriate behaviour.
- Immediately reporting any bribery, fraud, money laundering, slavery or forced labour, or any dishonest, illegal, fraudulent, corrupt or unethical behaviour — even if it's just a suspicion.
- Encouraging employees and customers to raise concerns about poor customer outcomes experienced when we are applying the rules, or otherwise.
- Providing all our people with access to internal whistleblower, employee counselling and workplace relations services.
- Being transparent when things go wrong and encouraging an open dialogue about important issues even when they are hard.

We own it

We are committed to keeping our promises, and we take ownership for delivering good customer and community outcomes. We do this by:

- Taking reasonable steps to ensure that everyone conducting business on behalf of Suncorp follows the principles and requirements of our Code of Conduct.
- Supporting our people to do the right thing in any situation, balancing customer, performance and risk considerations.



Caring for others

We are genuine, inclusive and we care about our customers, our people and the communities in which we operate.

We are genuine

We are authentic and have a genuine interest in delivering successful outcomes for our people, our customers and our other stakeholders.

We do this by:

- Treating our people, our customers, community and our other stakeholders with respect and dignity, in every interaction.
- Developing real connections with our customers and each other.
- Making employment and remuneration decisions that are fair, equitable and based on merit.
- Not treating anyone less favourably because they have made, or propose to make, a complaint against the organisation or anyone else.
- Being polite and respectful to everyone we interact with (including online), irrespective of their views.

We are inclusive

We value diversity, inclusiveness and equal opportunity as we understand a diverse range of views leads to better decision making and better outcomes for our customers, our people and other stakeholders. We do this by:

- Respecting each individual's human rights and treating everyone fairly and without unlawful discrimination.
- Providing fair and favourable working conditions to help our people balance their personal and family commitments.
- Never harassing, bullying or discriminating against our colleagues, customers, visitors or any other individuals.
- Never using electronic and communication media in a way that might offend, discriminate against or harass colleagues or the public. This includes accessing, viewing, sending, storing, transmitting, creating or downloading inappropriate or offensive material.

We care

We care about the wellbeing of our people, our customers and everyone we interact with. As an organisation, we are committed to building the financial, social and environmental resilience of our people and communities. We do this by:

- Training our people to be able to recognise and assist when a customer is experiencing financial difficulty or vulnerability.
- Taking reasonable care for our own safety, physical and mental wellbeing, and that of others.
- Encouraging our people to be caring and active members of the community, and to build a sustainable future. It all comes down to the choices we make, every day. That means we:
 - Consider customer, community and environmental outcomes when we make decisions.
 - Work in partnership with stakeholders to build inclusive, thriving and adaptable communities.
 - Use and dispose of our resources and assets in a sustainable way that reduces emissions and waste.
 - Act in a way that does not adversely impact Suncorp's reputation.

More information

How we support the use of our Code

The Code of Conduct is underpinned by relevant legislation and regulatory requirements that are in operation in Australia and New Zealand. It is also supported by Policies and Standards which can be found on the Suncorp Intranet.

To support the use of our Code we:

- Publish the Code to our people and publicly for our stakeholders.
- Provide access to our Code to the people it applies to.
- Review our Code every two years.
- Train our people on the Code every year.
- Require those covered by the Code to acknowledge acceptance of the Code every year.
- Use the Code with our employees in reviews of their performance and remuneration decisions, as well as when determining appropriate disciplinary outcomes.
- Disclose metrics on adherence to the Code and its use in taking formal disciplinary action.

If anything is unclear, where can I get help?

If you work for Suncorp and need help understanding any part of our Code, you can talk to your leader, or leader-once-removed.

If you're an associate of Suncorp (a supplier or partner for example), simply contact your official Suncorp representative.

Approver: Board

Owner: EGM People & Performance

Last Approved: 10 February 2020

Effective Date: 1 July 2020

Review Frequency: 2 years