# CODE OF CONDUCT

<table>
<thead>
<tr>
<th>Group Policy:</th>
<th>V6.0</th>
</tr>
</thead>
<tbody>
<tr>
<td>Category:</td>
<td>Workforce</td>
</tr>
<tr>
<td><strong>Purpose:</strong></td>
<td>Suncorp's Code of Conduct ensures we do the right thing by Suncorp, our people, customers, suppliers, partners, intermediaries, shareholders and to each other. It covers the way we act, and how we interact with others, and is underpinned by our policies, standards, procedures and guidelines. The Code also sets out the consequences of non-compliance with the expected standards. It’s a powerful guide to being the best company we can be.</td>
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<tr>
<td><strong>Scope of Application:</strong></td>
<td>Our Code applies to all employees, officers and directors within Suncorp. We also expect that anyone representing or working with us (partners, agents, suppliers etc.) will abide by our Code.</td>
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<tr>
<td><strong>Approver:</strong></td>
<td>Board</td>
</tr>
<tr>
<td><strong>Policy Statement:</strong></td>
<td>Suncorp will have a Code of Conduct approved by the Board.</td>
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<tr>
<td><strong>Legislative or Regulatory:</strong></td>
<td>The Code of Conduct is underpinned by relevant legislation and regulatory requirements that are in operation in Australia and New Zealand.</td>
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<tr>
<td><strong>Requirements:</strong></td>
<td>To the extent that this Code imposes obligations on Suncorp, it does not form a contractual term, condition or representation.</td>
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<td><strong>Application:</strong></td>
<td>In the first instance, employees should contact their leader and/or leader once removed (LOR). In Australia, employees can also contact People Connect on 1800 188 833. In New Zealand, employees can also contact their PX Representative. All associates should contact their Suncorp representative.</td>
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</tbody>
</table>
Companies are more than logos, buildings or policies. Companies are made of people.

Here at Suncorp our Code of Conduct provides the guidelines to ensure we're all doing the right thing, 24/7, all year round.
Our Code of Conduct is who we are
"We are a company of good people, doing great things to create a better today"
Welcome

At Suncorp we go beyond earning profits and providing quality solutions to our customers. We are committed to making a difference for our customers, employees and the communities where we live and work. We also play our part when it comes to major economic, social and environmental change, caring as much about how our results are achieved as we do about the results themselves.

Our Code of Conduct provides guidance on the standards of conduct we expect of our people, and those who represent us when we’re working together, and when we’re interacting with our customers and others.

To complement the Code of Conduct we have our Compass which provides additional guidance through core behaviours. It’s these core behaviours that help us unlock the potential each of us has and to create a unique experience for each other and our customers.

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

By observing the standards in our Code of Conduct and using our Compass to guide our behaviours, we each contribute to making Suncorp a great place to work and fulfill our purpose to create a better today.

Please take the time to read and understand our Code of Conduct and use it in your daily work.

A WORD FROM OUR CEO & MANAGING DIRECTOR, MICHAEL CAMERON
OUR STRATEGY

ONE SUNCORP BUSINESS MODEL
Our business model will allow customers to interact with us in a simple, easy and consistent way.

We are operating as One Suncorp – working together as one to build a more resilient and enduring company.

This allows us to have full visibility of our customers across all of our brands, and to better understand, serve and meet more of their needs in an effective way.

SUNCORP’S PURPOSE IS TO CREATE A BETTER TODAY FOR OUR STAKEHOLDERS

We help people live the life they want now, and plan for the life they want tomorrow.

Our customers: Provide customers with solutions that enable them to enjoy the life they have today and feel secure that good choices are in place for the life they want tomorrow.

Our shareholders: We operate a resilient business that will continue to deliver strong returns and growth over the long-term.

Our people: Our people are inspired to be innovative, make decisions and behave in ways that contribute to creating a better today for all stakeholders.

Our communities: We are an integral part of the communities we operate in. We collaborate to build resilience for today so communities can thrive in a changing world.

Our industry: Our clear focus on providing innovative solutions that meet customer needs raises industry standards and improves public perception.

Our economy: We operate a stable company that provides financial protection and liquidity so that individuals, businesses and governments can use their capital productively.

HOW OUR CODE OF CONDUCT FITS IN
Our Code sits across all areas of our business, from the things we do every day at work, to the way we run our business.

Our Code is a summary of how to apply these elements, and bring them to life for others.

It’s an essential part of working for, and with, Suncorp and interacts with all of our policies.

Please take the time to read through our Code and ask your leader if you have any questions.
1 CODE OF CONDUCT

1.1 WHAT IS A CODE OF CONDUCT?

In short, the Code of Conduct ensures we all do the right thing by Suncorp, customers, our people, suppliers, intermediaries, partners, shareholders, investors and each other. It covers the way we act, how we elevate the customer and how we interact with others, and is underpinned by all of our policies, standards, procedures and guidelines. It’s a powerful guide to being the best company we can be.

1.2 WHO IS OUR CODE FOR?

Our Code applies to all employees, officers and directors within Suncorp. Naturally, we also expect that anyone representing or working with us (partners, agents, suppliers etc.) will abide by our Code too.

1.3 WHEN DOES OUR CODE APPLY?

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.

1.4 LEADING BY EXAMPLE

Leaders must ensure that their teams are familiar with our Code. This also means leading by example, using our Code to guide behaviours, fostering a culture of openness and understanding, making sure policies are understood, and responding quickly to concerns and questions about our Code.

1.5 HOW DO I ACTUALLY USE OUR CODE?

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

• Am I observing the standards set out in the Code?

• Am I elevating the customer by focusing on delivering value for them?

• Are the needs of the customer the primary consideration?

• Does this feel like the right thing to do?

• Might this break a law or a policy — is this legal?

• Will this potentially cause harm to anyone else?

• What would the customer or shareholder think?

• If this situation was to appear on the news, how would I react?

• What would my colleagues and family think?

• Is this ethical?
1.6 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.

1.7 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 raise the issue with People Experience by calling People Connect on 1800 188 833 (AU) or 09 363 8376 (PX NZ).

Alternatively, you can contact the Whistleblower service where you can report conduct in accordance with the Whistleblower Policy by calling Australia 1800 444 774 New Zealand 0800 202 643 or by emailing suncorp@deloittedigital.com. You can also report suspected cases of internal fraud by contacting Group Financial Crimes in Australia 1300 182 442 and New Zealand 0800 451 773 or email InternalFraud@suncorp.com.au

1.8 WHAT HAPPENS IF I BREACH OR IGNORE OUR CODE?
As an employee, there’s a natural expectation that you’ll follow our Code and any other policies or standards that come with your employment.

Take the time to familiarise yourself with everything in here and make sure it’s 100% clear.

If you don’t comply, Suncorp can take disciplinary action, including formal warnings, limiting increases to fixed pay, short or long-term incentives and benefits, or even termination of employment. Nobody wants that, so please familiarise yourself with everything in here and make sure it’s 100% clear.

If you’re an associate of Suncorp, we may ultimately choose to end our business relationship with you if you’re in breach of our Code.
Putting our people first
We want Suncorp to be a great place to work and that means ensuring all our people feel valued, respected and supported.

Our Compass (kick goals, show you care, be your best, think big) sets shared behaviours that help us every day in the way we work together, the way we make decisions and how we meet our customers’ needs.

**IT’S ALL ABOUT MAKING SUNCORP A PLACE THAT:**
- Provides fair and favourable working conditions that respect the dignity and human rights of everyone
- Shows respect and care for our people
- Values diversity, inclusiveness and equal employment opportunities
- Protects the health, safety and wellbeing of our people
- Is free from any form of harassment, bullying or discrimination
- Encourages the accountability and responsibility of leaders
- Makes how we achieve our goals as important as what we achieve
- Elevates our customers, builds trust and creates value for them
- Reflects our commitment to be part of the wider community and contribute in a positive way.

**WE’RE ALL EXPECTED TO:**
- Treat everyone fairly and respectfully
- Carry out our duties safely and in accordance with relevant health and safety standards, practices, and procedures
- Report any issues, incidents, or actions which might compromise the safety of the workplace, or the health of any of our people
- Be fit to perform our duties at all times, unimpaired by drugs, alcohol or other substances
- Make employment decisions based on merit
- Always be aware of our behaviour towards others in the workplace — we won’t tolerate behaviour that could be perceived as inappropriate, unreasonable or intimidating

**AND WE’RE NOT TO:**
- Harass, bully or discriminate against our colleagues, customers, visitors or any other individuals
- Treat anyone less favourably because they have made, or propose to make, a genuine complaint against anyone else.

...ensuring that all our people feel valued, respected, included and supported
Personal and commercial integrity
3

PERSONAL AND COMMERCIAL INTEGRITY

3.1 DOING THINGS THE RIGHT WAY

Trust and confidence. It’s what Suncorp has been built on. And to maintain the high expectations of everyone we interact with, it’s important we conduct our business activities honestly and with integrity.

OUR EXPECTATIONS

From using our Compass behaviours to guide every aspect of your work or engagement with Suncorp, to dealing fairly and ethically with everyone you encounter, we expect you to maintain a high standard of professionalism at all times. This includes:

- Respecting and accepting people’s differences and diversity, and dealing with them respectfully and without prejudice or discrimination
- Ensuring your work is always done diligently and with care
- Ensuring you’re being genuine, making it easy, owning it and finding solutions for your customers
- Immediately reporting any bribery or dishonest, illegal, fraudulent, corrupt or unethical behaviour — even if it’s just a suspicion.

We expect you’ll never behave in a way that’s dishonest, illegal, fraudulent, corrupt or unethical — or has the ability to inappropriately advantage you, your family or friends. This includes processing transactions on your own accounts or policies, or those of your family or friends.

It’s important we conduct our business activities honestly and with integrity.
3.2 STAYING CLEAR OF CONFLICTS OF INTEREST

Effectively managing conflicts of interest is everyone’s responsibility and helps Suncorp demonstrate that we do business in a fair, honest and ethical way.

That’s why we make such a serious effort to avoid situations where our commercial, professional or personal interests conflict — or could be seen to conflict.

Of course, we realise that sometimes conflicts of interest are unavoidable. When that happens, they’ll be managed under the relevant policies and standards.

OUR RESPONSIBILITIES IN THIS AREA
We all need to be aware of actual, perceived, or potential conflicts of interests. So if you identify one, it’s up to you to bring it to the relevant person’s attention. You also need to be careful when giving or receiving gifts and entertainment, and when necessary these should be disclosed under the relevant policy and standard. Also make sure you enter it into the conflicts of interest register which can be found on the Suncorp Intranet Conflict of Interest homepage.

YOU’RE ALSO EXPECTED TO ALWAYS:
• Be aware of the obligations imposed upon us by supporting policies and standards
• Seek clarification from a leader or Suncorp representative if there’s any doubt about whether to accept a gift, entertainment or benefit
• Be fair, genuine and transparent in all commercial relationships
• Keep price sensitive information that you come across in the course of your role confidential.

...we avoid situations where our commercial, professional or personal interests conflict.
3.3 WORKING WITH OUR STRATEGIC PARTNERS

We’re proud of our high performance culture — a culture that applies internally and outwardly to all our partners. For this reason we always ensure the appropriate due diligence is done before engaging or entering into any relationship with a business partner.

We have a unique ‘One Suncorp’ approach to partnering involving best-in-class providers who each offer a range of significant opportunities and benefits to Suncorp. Our collaborative relationships with strategic partners, and our commitment to creating a better today for our people, creates a sustainable competitive advantage for Suncorp.

MANAGING OUR RELATIONSHIPS

Like any relationship, those we have with our business partners must be constantly developed. This not only protects our reputation but also ensures we get the most out of the relationship. Apart from ongoing monitoring, this involves doing the appropriate risk assessments, due diligence and approvals.

Our partners are expected to uphold and abide by our Code — as well as uphold the spirit and intent of our underlying policies, standards and guidelines. This also goes for third parties who interact with others on behalf of Suncorp, including agents, brokers, consultants and joint venture partners.

WE'RE ALL EXPECTED TO:

- Ensure the correct processes are followed by our partners
- Comply with all relevant conflict of interest procedures
- Always act in the best interests of Suncorp
- Report any breaches of our Code, or any behaviour by partners, that’s inconsistent with it
- Get authorisation when required before engaging or doing business with a partner.

WE SHOULD NEVER:

- Turn a blind eye to conduct that’s inconsistent with our Code
- Tolerate behaviour which is inconsistent with our Code.
3.4 WE ALL PLAY A ROLE IN ELEVATING THE CUSTOMER

Our Compass acts as a guide for our day-to-day behaviours and when it comes to our customers, we should all strive to consistently deliver great customer experiences.

We all play a role in delivering great experiences. This means using every opportunity to be genuine, make it easy, own it and find solutions for our customers.

Inappropriate customer outcomes can result from putting personal or financial interests above the interests of the customer. Great customer outcomes come from great service that provides the right solution to their needs. If in any doubt, your leader can give you guidance.

WHAT WE EXPECT FROM YOU
You’re expected to act in good faith and in the best interests of Suncorp and your customer at all times. This means using our Compass to guide your behaviour, acting ethically and elevating the customer to create deeper relationships that solve their problems and meet their needs.

3.5 YOU’RE THE BEST AMBASSADOR FOR SUNCORP

We all know that sometimes the line between our private and work lives can get a little blurred. But even still, it’s important that we try to keep them as separate as possible.

This means using our business assets and resources in an appropriate and responsible way, and only for legitimate business purposes.

Everyone in Suncorp is expected to protect our assets, including intellectual property, business and marketing plans, and employee information. In some cases this obligation to protect our assets continues after you’ve finished working with us.

WHAT WE EXPECT FROM YOU
You’re expected to act in good faith and in the best interests of Suncorp at all times. This means demonstrating due care and diligence, and following our policy framework. You’ll also be expected to consider and protect our Suncorp assets — namely Customers, Capital, Cost and Culture. This means operating within our risk appetite and looking 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 a better today for all our stakeholders.

WHAT NOT TO DO
Taking advantage of your position whether you’re working for, or with Suncorp, you should never take advantage of your position or information gained through your employment.

INAPPROPRIATE USE OF ELECTRONIC MEDIA
You should also never use electronic and communication media in a way that might offend, discriminate against or harass your colleagues or the public. This includes accessing, viewing, sending, storing, transmitting, creating or downloading inappropriate or offensive material.

...we all play a role in creating great customer experiences

...you should never take advantage of your position or information gained through your employment
Doing it by the book
4.1 COMPLYING WITH OUR OBLIGATIONS

Whether it’s remaining on the right side of the law or upholding our own internal standards, as Suncorp employees we all have to meet certain obligations. If we don’t meet our obligations it can have serious consequences for Suncorp, our shareholders, and those associated with us.

We’re all individually responsible for understanding which obligations apply to us and the work we’re doing. The good news is Suncorp has a number of systems, policies, standards and procedures to make it easier to know and adhere to all the laws and regulations that apply to us.

WE’RE ALL EXPECTED TO:

• Follow the principles and requirements of our Code and take reasonable steps to ensure that everyone conducting business on behalf of Suncorp does the same

• Be familiar, and comply with the relevant laws and regulations applying to us

• Abide by all relevant rules and standards for bodies that regulate the industries we’re involved in

• Carry out our work in accordance with Suncorp’s internal standards, policies, procedures and practices

• Comply with all contractual obligations and other undertakings without attempting to evade or delay compliance

• Follow all reasonable and lawful leader and leader-once-removed directions

• Act within our authority level

• Complete all required training and education programs to ensure we understand all relevant laws, regulations, contractual obligations, policies, standards, guidelines and procedures

• Protect our future by making informed, commercial decisions that manage risk and ensure Suncorp remains sustainable for the long-term

• Talk to your leader or your Chief Risk Office team if you’re unsure whether a particular law, contractual obligation, regulation, policy, or standard applies.

...we’re all individually responsible for understanding which obligations apply to us and the work we’re doing.
In order to earn trust, we need to respect privacy.
5.1 KEEPING IT TO OURSELVES

Whether it’s our people, customers, suppliers, partners, intermediaries and shareholders, we are trusted with personal, financial and at times sensitive information — and it’s vital that we respect the confidentiality of the information.

Every Suncorp employee has a responsibility to follow the laws and industry codes of practice around disclosure of information — particularly privacy laws — even after your time with Suncorp has come to an end.

Simply put, you mustn’t ever disclose confidential or privileged information concerning Suncorp’s business to any external party unless you’re specifically authorised to.

WE’RE ALL EXPECTED TO:

• Respect the privacy of everyone we come into contact with at Suncorp

• Protect the security of any personal information we handle

• Follow the policies and procedures around protecting information — collection, use, disclosure, correction and storage

• Ensure access, use and disclosure of personal, confidential, sensitive or privileged information, is authorised and only used for work-related tasks.

AND WE’RE NOT TO:

• Encourage or pressure anyone into disclosing personal, confidential, sensitive or privileged information

• Use confidential information for personal gain (or for the gain of others)

• Reveal any information about Suncorp that isn’t already in the public domain (unless you have the authority to do so)

• Communicate either directly or indirectly with the media about Suncorp’s business activities unless authorised.

...we are trusted with highly sensitive information — and it’s vital that we respect the confidentiality of the information.
Playing our part
PLAYING OUR PART

There’s a big world out there and at Suncorp, we believe that being a great citizen is an important part of being a successful organisation.

Our approach to Corporate Responsibility aims to create a better today by contributing to the long-term financial wellbeing and quality of life for the communities where we live, work and play.

That’s why we ask all our people to be caring and active members of the community, and to be a part of our efforts to build a sustainable future.

It all comes down to the choices we make, every day. That means:

• Using and disposing of our resources and assets (including land, property and buildings) in a sustainable and responsible way

• Supporting and participating in community events and activities

• Being aware that what we do as a business can have a real impact on our customers, employees, clients, suppliers, shareholders, the community and the environment.

WE’RE ALL ENCOURAGED TO:
• Get involved in community events and activities

• Demonstrate respect for our communities and the environment in all our activities.

...what we do as a business can have a real impact on our customers, employees, clients, suppliers, shareholders, the community and the environment.
Finding the line between work and play
7.1 KNOWING WHAT TO SAY, AND HOW TO SAY IT.

Social media has changed our lives. It’s fun. Simple.

Social media is also a great way of communicating with family and friends. But what happens when the boundary gets blurred between ‘you being you’ – and you being identifiable as an employee or associate of Suncorp?

Here’s an overview to help make it simple:

- Be polite to everyone you interact with online — irrespective of their views.
- Remember, you can’t take it back once you’ve said it.
- Respect things like copyright, privacy, confidentiality, financial disclosure and any other applicable laws whenever you post.
- Remind people that your opinions are YOURS and not those of Suncorp.
- It’s easy to be critical online, but make sure what you say is never hurtful, obscene, defamatory, negative, critical, threatening, harassing, discriminatory or hateful.

Technology is also changing at a rapid pace, so it’s important to remember these principles when we communicate with our colleagues via any technology e.g. phone, instant messaging, email.

If in doubt — pause, don’t do it and ask your leader for guidance.

...make sure what you say is never hurtful, obscene, defamatory, negative, critical, threatening, harassing, discriminatory or hateful.
Creating a better today for everyone

Get to know your Group Policies
The Code of Conduct is underpinned by relevant legislation and regulatory requirements that are in operation in Australia and New Zealand, in areas including, but not limited to:

- ASX Corporate Governance Principles 3.1
- Discrimination and Human Rights
- Equity and Diversity
- Occupational Health and Safety
- Trade Practices

**SUPPORTING DOCUMENTS:**

- Our Compass
- Conflict of Interest Policy
- Compliance Management and Regulator Engagement Policy
- Delegations of Authority Policy
- Disclosure Policy
- Equal Employment Opportunity and Diversity Policy
- Anti-Fraud Policy
- Security Management Policy
- IT Acceptable Use Policy
- Media Relations Policy
- Privacy Management Policy
- Remuneration Policy
- Safety and Wellbeing Policy
- Securities Trading Policy
- Whistleblower Policy
- Partnering Policy
- Procurement Policy
- Conduct and Behaviour — PX policies and procedures intranet
- Suncorp Corporate Responsibility
- Standard Definitions Document
- Suncorp Customer Charter.