

# Our Code of Conduct



Suncorp Group Limited  
ABN 66 145 290 124

The way we act today.  
The impact we make tomorrow.



**We're all striving to make a difference here at Suncorp – to do better for our customers, our people and our communities, every day. It's our Code of Conduct that keeps us on track.**

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At the heart of this Code is our Purpose – 'building futures and protecting what matters'. It's an ethos built on more than a century of care and support for our customers in Australia and New Zealand.

Our Code of Conduct helps to bring our Purpose to life, providing a clear set of guiding principles so that we can all make a difference and be better every day. I'm proud of the culture we have built and continue to build at Suncorp, and our Code of Conduct is core to this. It enables our people to thrive and plays an important role in the decisions we make each day and the care we take to drive valued experiences and outcomes for our customers. It builds trust and confidence in how we think and act, while reflecting the unique spirit that unites us and genuinely makes Suncorp a great place to work.

**Our Code of Conduct is underpinned by our Being @ Suncorp Behaviours**

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

In embracing these behaviours, I hope you're inspired to be your best self – knowing that you're playing a vital role in delivering on our Purpose and providing valued outcomes for our business and stakeholders that we can all be proud of.

**Steve Johnston**  
Group CEO



# Living Our Code

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## How do I get the most out of our Code?

We've aimed to make the Code of Conduct as easy to follow as possible. If you're not 100% clear on whether or not you're on the right track, ask yourself:

- Am I acting fairly, honestly and with integrity?
- Am I breaking a law or Suncorp policy?
- Does this feel like the right thing to do?
- Could this cause harm to anyone?
- Does this consider specific customer circumstances?
- Am I proud of what I am 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?

In short, anyone working with or representing the Suncorp Group – including employees, contractors, officers and directors. We also encourage external partners, agents, suppliers and intermediaries to get onboard with the Code and follow the principles it outlines, so we're all working in service of the same Purpose.

If you're representing Suncorp – even when you're outside the office – the Code signals your commitment to building futures and protecting what matters and your pride in the impact you can make with Suncorp.

## What happens if I don't follow our Code?

At Suncorp, we work carefully to create a culture that's built on trust, empowerment, and flexibility. We are proud to reward and celebrate when our people embody and embrace our purpose, 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, breaching our Code may also lead to the end of our business relationship with you.

## Who do I talk to if I see our Code being breached?

Talking things through with your leader is the best place to start. If that's not possible, reach out to your leader's leader. Otherwise, you can get in touch with People Connect on **1800 188 833** (AU) or **09 352 7885** (NZ) or email [peopleconnect@suncorp.com.au](mailto:peopleconnect@suncorp.com.au)

Other ways to talk through potential breaches of our Code include:

- Contacting 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](mailto:suncorp@deloittedigital.com)
- Reporting suspected cases of internal fraud to **Group Internal Fraud** on **1300 182 442** (in Australia) or **0800 451 773** (in New Zealand), or by emailing [InternalFraud@suncorp.com.au](mailto: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.**

## **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, meet their needs, and make fair decisions.
- 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

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**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 safe and easy for our people to raise concerns, ask questions, and share their ideas as soon as they notice something is not right or could be improved. We do this by;

- Creating a psychologically safe and inclusive work environment.
- 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

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**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

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## 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.