

Retail Employees Superannuation Trust

Code of Conduct Position

Policy Owner:	Chief People Officer
Version	1.0

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1 Introduction

Rest is committed to the highest standards of integrity and transparency. The Rest Code of Conduct describes the standards of conduct and behaviour we expect. It provides a set of guiding principles and clear direction to help us make the right decision every time when working at Rest as well as in our relationships and business dealings with members, employers, contractors, suppliers, stakeholders and others.

This external document is an extension to the Rest Code of Conduct which is accessible to the Rest Workforce (including employees) through the internal Intranet.

2 Who this applies to

The Code of Conduct applies to anyone who works at Rest at any location, including people who work full time or part time as well as our Directors, contractors, and consultants.

People Leaders are expected to model the Rest values, and the Code of Conduct has the full support of our Board and our Executive Leadership Team. Everyone at Rest is accountable for their own decisions and actions and is responsible for holding each other to account, including calling out behaviours that don't meet the Code of Conduct.

Our Whistleblower Policy means people who fall within the definition of a 'whistleblower' who either work for Rest, or are external to the organisation, and who have reasonable grounds to suspect improper conduct or misconduct, can raise concerns without fear of retribution.

3 Why it matters

It's important that we always act in the best interests of our members and uphold Rest's reputation. We must comply with Rest's policies and procedures, so that we meet our legislative and regulatory obligations. Rest takes the Code of Code seriously and breaches may lead to legal or disciplinary action.

4 Core Principles

The following defines our Core Principles:

Core Principle	Definition
We act ethically, with care and integrity	Everyone at Rest is expected to demonstrate the highest standards of behaviour and conduct while performing their role. This is a must, and is simply not negotiable. Acting with integrity means being honest, equitable, transparent, and socially responsible in all dealings.
	It means being careful and diligent, so we comply with our legal and regulatory requirements and we make sure our actions hold up to disclosure and to public scrutiny. It also extends to our relationships.
	We work to make sure that everyone is treated fairly and with respect. We value different points of view and backgrounds and this is part of our culture and how we work.

Core Principle	Definition
We present professionally	As ambassadors of Rest, we present ourselves in an approachable, respectful and professional way – whether in person, virtually or online.
	We dress in a way that is appropriate to our commitments. Rest is also committed to providing a safe and healthy (including psychologically safe) work environment. Working while under the influence of drugs or alcohol doesn't go hand-in-hand with making good decisions. Therefore, employees are not to use illicit/illegal drugs whilst at work or arrive at work in a drug or alcohol induced state. Where there is a social work event, and alcohol is served, employees are expected to behave appropriately.
	Rest has an Employee Access Program that people can contact confidentially if they feel they need support.
	Our commitment to professionalism extends to online conduct, including the use of personal social media, especially where identifiable as a Rest staff member or contractor.
	No one should comment on or disclose confidential information. Care should be taken to ensure posts, and any material shared, are not misleading or deceptive. All material posted on digital channels, including social media should be in line with Rest policies.
	Defamatory, abusive, discriminatory, disrespectful, bullying or harassing content on any platform or in any forum is unacceptable.
	No one should speak on behalf of Rest to the media, at industry forums, to stakeholders or on social media unless officially authorised to do so as set out in Rest's policies, including the External Communications and Spokesperson Policy.
We are respectful and inclusive of each other	Rest recognises the value of workplace diversity and we respect each other's differences. Everyone should be able to succeed at work free from discrimination, harassment (including sexual harassment) and bullying. Teamwork equips us to succeed together. If we are to help members achieve their personal best retirement outcome, then we need to truly demonstrate this with our words and actions.
We comply with all laws, regulation and standards	Full accountability and transparency in all matters is expected, in keeping with Rest's policies and regulatory responsibilities. Superannuation can be complex. Only people with the appropriate qualifications can give advice to members.
	Rest has an obligation to also provide relevant disclosures on its material, social channels, presentations and other interactions with members and stakeholders.
We avoid conflicts of interest	Being aware of what might constitute a conflict of interest, and knowing when and how to declare one, will help protect you and Rest. Conflicts of interest arise when personal interests may, or could be seen to, interfere or influence a business outcome at Rest. All employees and contractors should be familiar with Rest's Conflicts Management Policy and comply with it. If our people are aware of a conflict, or the potential for one, they must take active steps to disclose it.
	Rest has a 'no gifts' policy, and business partners, agents and contractors should be made aware of this. Second jobs, businesses or other side interests should not get in the way of employee's Rest work, involve Rest's resources or information, solicit Rest clients, members, or business

partners, or cause a conflict in any way.

Core Principle	Definition
We respect privacy and information	Our members trust us to keep their personal and financial information confidential and secure. This is an absolute must. The privacy of other Rest information and business dealings should also be treated as confidential and this should be remembered during any internal or external interactions, speaking engagements and while using social media. All computers, hardware, software, photocopiers, telephones and related technology are the property of Rest and shouldn't normally be used for private purposes and must not be used to access inappropriate or offensive content.
We uphold our values	At the heart of everything we do at Rest are our values and behaviours. They are critical to our success in delivering our Super Simple strategy. Rest has four core behaviours and values that underpin how we deliver every day.
	Our behaviours and values are built around a commitment to simplicity, a dedication to perseverance, a drive to make an impact and a willingness to be courageous. These values are shared statements of how we conduct ourselves in all our interactions with each other, our service partners, as well as external stakeholders.
	Our values and behaviours bring to life who we are; and by living and championing these values, we're able to deliver the best outcomes for our members and partners.
	Our values are:
	1. Be DARING: We are bold and have the courage to reinvent super.
	2. Keep it SIMPLE: If the gist can't be explained in under a minute, it's too complex.
	3. Take ACTION: Action improves outcomes and outcomes change lives.
	4. Have GRIT: Making super simple isn't easy but it's worth it.
	These values are our guiding principles and inform the way we work on behalf of our members to deliver our purpose to create super that is loved and our mission to make super simple.
We work flexibly	Rest offers flexible working arrangements to fit the different needs and circumstances of our diverse workforce.
	Our people are trusted to work flexibly to meet the requirements of their role. This includes working in a hybrid model between office and home.
	We support our employee's diverse lives by helping them thrive at work while upholding the confidentiality and standards expected by Rest. Working flexibly or in a hybrid model carries additional responsibilities. It's important when working flexibly or in a hybrid model, our employees work in accordance with any relevant Rest guidelines, policies and procedures, including workplace health & safety, and that we continue to do our jobs to the highest standards possible.

5 What happens if the Code of Conduct is breached?

Breaches of the Code of Conduct will be dealt with under the Framework for Creating an Accountable Culture and/or Rest Disciplinary and Consequence Management Framework Guidelines.

Depending on the nature of the breach, consequences may include:

· Severe reprimand or warnings;

- Demotion;
- Transfer to another role;
- Temporary suspension from work;
- Dismissal;
- Notification to an external agency;
- Notification to APRA, ASIC, AUSTRAC or other regulatory bodies;
- · Referral to the police for the laying of criminal charges. OR
- Contractors and consultants who engage in unacceptable behaviour may have their contract or engagement with Rest terminated or not renewed.

Employees who report breaches of the Code of Conduct will be protected from victimisation and/or discrimination. Employees can report conduct which breaches the Code of Conduct by confidentially contacting the Chief People Officer.