

Code of Conduct

1. Introduction

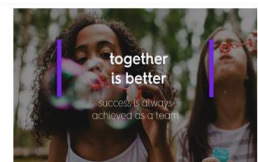
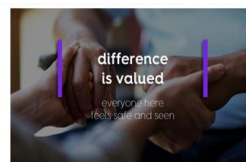
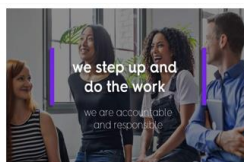
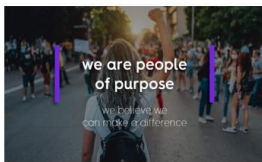
The H.E.S.T. Australia Limited ACN 006 818 695 (**HESTA**) Code of Conduct (**Code**) outlines the behaviours and conduct expectations of people engaged at HESTA.

This Code, read together with other HESTA policies, applies to all employees (including agency hire and daily rate contractors) and directors.

People engaged at HESTA are required to ensure that their conduct is in accordance with this Code. A contravention of this Code may constitute misconduct and result in disciplinary action.

2. Culture, Values & Behaviour

HESTA is a respectful, inclusive, safe and supportive workplace. We are passionate about, and invest in maintaining a culture that reflects our values; our behaviour at work is consistent with our values.



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| <ul style="list-style-type: none"> ✓ Seek out new and better ways to do things to help ✓ Stay connected to our purpose: helping those who help others | <ul style="list-style-type: none"> ✓ Take responsibility for our successes and our failures ✓ Actively decide to step in and help without being asked | <ul style="list-style-type: none"> ✓ Treat others with dignity and respect, no matter their role ✓ Aim to understand the perspectives of everyone involved | <ul style="list-style-type: none"> ✓ Encourage and support others to innovate and share bold ideas ✓ Acknowledge the role of every HESTA team, person and partner |
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| <ul style="list-style-type: none"> × Negative language and a sense of hopelessness around challenges × Accept the status quo without looking to improve or do better | <ul style="list-style-type: none"> × Blame others if a mistake is made or a project isn't going well × Walk away when things get tough, and let someone else fix it | <ul style="list-style-type: none"> × Closed to hearing or accepting different perspectives to my own × Let our privilege or bias impair our judgement | <ul style="list-style-type: none"> × Focus only on myself and what I need to do, ignoring everyone else × Look the other way if someone is struggling |
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The Code describes the behaviours that exemplify these values.

3. Appropriate Workplace Behaviour

It is expected that appropriate workplace behaviour is maintained during employment and that behaviour or conduct does not place HESTA into disrepute.

Behaving appropriately means:

- acting in the best interest of HESTA and putting member interest above their personal interests;
- acting respectfully, professionally, impartially and honestly in the performance of their duties;
- not doing anything to tarnish HESTA's brand and reputation, whether intentionally or unintentionally;

- upholding the law;
- complying with HESTA policies;
- not misusing drugs and alcohol in the workplace or when attending workplaces, functions and events as a representative of HESTA;
- not engaging in behaviours that could be construed as bullying, harassment, sexual harassment discrimination or victimisation; and
- leading by example in modelling appropriate workplace behaviour.

4. Conflict of Interest or Duties

A conflict of interest is where a person engaged at HESTA has a personal or professional interest that conflicts with the interests of HESTA beneficiaries. A conflict of duty is where the duties owed by an employee to HESTA beneficiaries are in contradiction to the duties owed by them to another organisation or group of persons and vice versa.

People engaged at HESTA should ensure that any relevant personal or professional interests or duties are disclosed and managed in accordance with HESTA's Conflicts Management Policy.

5. Public Comments

People engaged at HESTA may only make public comments when specifically authorised to do so and must not provide 'off-the-record' comments or personal comments on matters related to HESTA or the fund. Public comments include speaking engagements and provision of information or comment through any media, including social media.

6. Financial Advice

People engaged at HESTA must not provide financial advice unless they have received a Letter of Authorisation from HESTA.

7. Privacy, Confidentiality and Intellectual Property

7.1. Privacy

People engaged at HESTA must follow the Australian Privacy Principles (**APPs**) outlined in the *Privacy Act 1988* (Cth), particularly when accessing and handling personal information and member data, or using HESTA's systems.

7.2. Confidentiality

All information used or accessible during a person's engagement at HESTA is confidential information (which also extends to regulated and restricted information) unless the information is publicly available or required by law to be disclosed.

People engaged at HESTA must:

- not access confidential information other than for the purpose of carrying out the permitted and required functions of their position;
- not disclose confidential information to any unauthorised person;
- not use confidential information for any purpose other than for HESTA's benefit during or after their employment with HESTA;
- not for themselves or any third party, appropriate, copy or in any manner reproduce any confidential information;
- return any or all confidential information upon request by HESTA; and
- provide for inspection all laptop computers, all notebooks and other electronic devices that store electronic data that have been used during employment (including equipment an employee owns), when requested by HESTA.

7.3. Intellectual Property

All intellectual property created whilst employed with HESTA is the property of HESTA.

Employees agree that any invention, discovery, novel design, copyright in any literary work, artwork and other copyright work created during and in the course of their employment with HESTA is the property of HESTA.

8. Acceptable Use of Work Resources

People engaged at HESTA should use work resources (such as corporate technology, systems and software) primarily for work purposes, however limited and reasonable personal use is acceptable.

9. Breaches of this Code and Consequences

Failure to abide by this Code is a serious disciplinary matter and may result in:

- the termination of employment for employees (including agency hire and daily rate contractors); and
- removal as a director for directors.

Concerns regarding a director's compliance with this Code will be managed in accordance with the Governance Framework.

9.1. Actions when allegations are made

If it is alleged that conduct has been identified that is contrary to this Code, employees and directors will have an opportunity to provide their version of events. If the allegations are more serious, a formal process may be required.

In investigating an allegation of a behaviour or conduct that is contrary to this Code, HESTA will ensure its decision-making is fair and reasonable.