

# AMP

# Code of Conduct

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2025



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## Acknowledgement of Country

AMP acknowledges all First Nations Peoples across Australia. We recognise the Traditional Custodians of the land and value the connection to Country, waterways and sky. We pay our respects to the Elders for their resilience, courage and wisdom; for ensuring the survival of this country's rich culture and heritage.



# Message from Alexis George, Chief Executive Officer

At the heart of our Code of Conduct is our Purpose – *helping people create their tomorrow*. It is why we come to work and our commitment to each other, our customers, shareholders, partners, members, advisors and communities.

Our Purpose is considered our beacon on the hill and the role of our Code of Conduct is to set clear expectations and principles to guide our actions and decisions along the path to reaching our Purpose.

**It is embodied by our five Values:**

**Put Customers First | Own It | Be Brave | Play as One Team | Do the Right thing**

Living our Values and delivering on our promises is how we earn and maintain trust.

Our Code of Conduct is about doing what's right, and taking accountability to speak up, listen and challenge respectfully. When things go off-track it's about acting quickly, learning and improving.

Sometimes choosing what's right may not always be easy. Our Code of Conduct should always be our guide as we ask ourselves – “should we?” rather than just “can we?”.

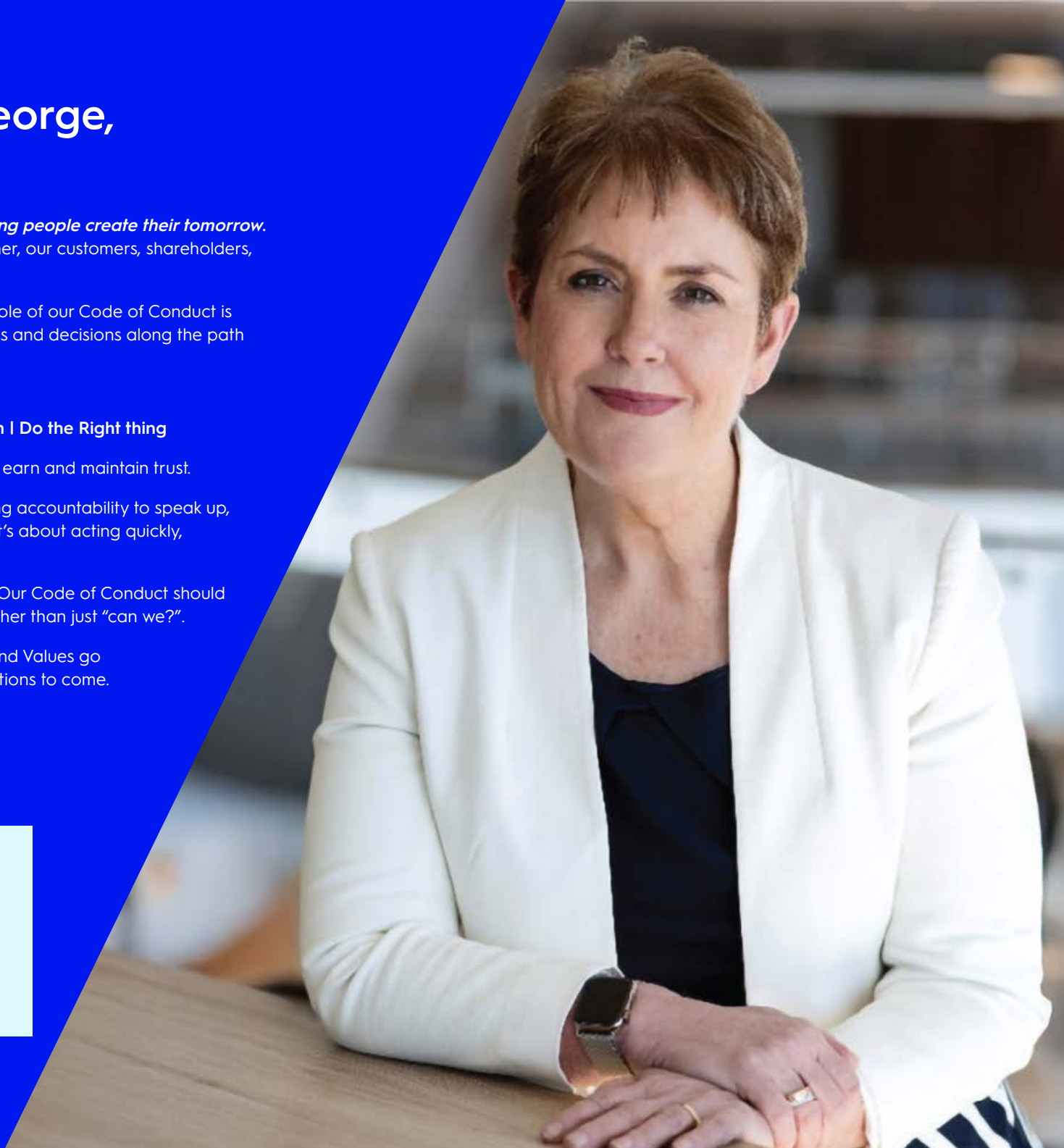
Following our Code of Conduct and fulfilling our Purpose and Values go hand-in-hand, ensuring our legacy will continue for generations to come.

Lex

**CEO, AMP Limited**

“The AMP Code of Conduct isn't a strict set of rules to cover every potential decisionmaking scenario, that would be impossible. Instead, it acts as a guide to support our people to make good decisions that are aligned with our Purpose and Values”

**Mike Hirst**  
Chairman of AMP Limited Board



# Our Code of Conduct

## Purpose of our Code of Conduct

Our Code of Conduct embodies our Purpose and Values and is a statement of how we do things at AMP. It sets out the expectations for how we all must behave. It is also a framework to help exercise good judgement and make decisions that are not only legally compliant but are also ethical, fair, and balanced - consistent with our Values.

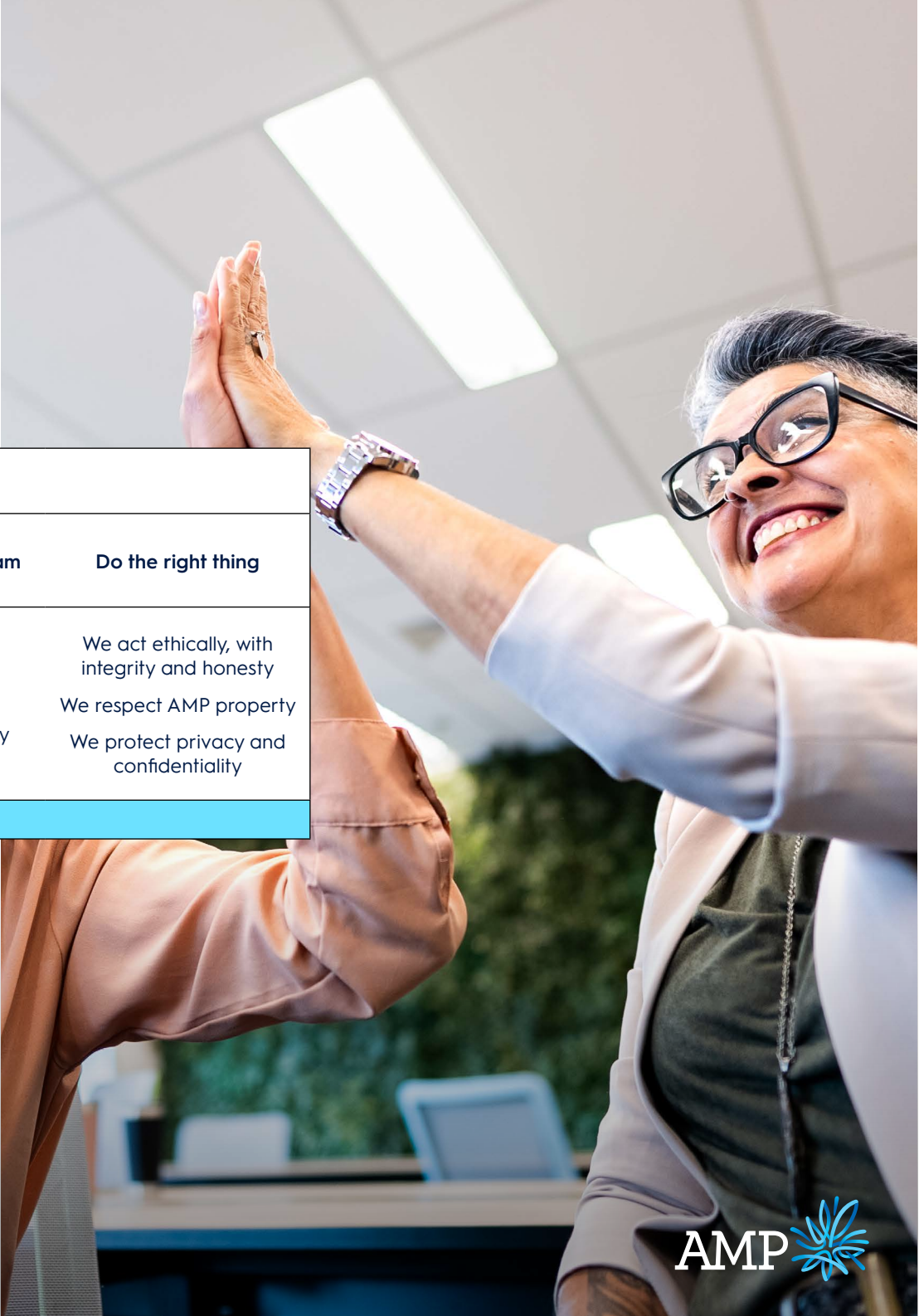
Our Code of Conduct is underpinned by our policies.

Purpose	Helping people create their tomorrow				
Values	Put customers first	Own it	Be brave	Play as one team	Do the right thing
Code of Conduct Expectations	We act in our customers' best interests	We take responsibility and are accountable	We challenge, learn and improve	We respect each other We work safely	We act ethically, with integrity and honesty We respect AMP property We protect privacy and confidentiality
AMP policies and procedures					

## Who does our Code of Conduct apply to?

Our Code of Conduct applies globally to anyone employed by, or who works for, AMP and all entities within the AMP group. This includes permanent and temporary employees, contractors, consultants, leadership teams and boards.

Our Code of Conduct applies whenever we are in our workplaces (physical or virtual, including anywhere work is performed) and whenever we are representing or associated with AMP (or are perceived to be). This includes functions or events, conferences, out-of-hours work activities and any social media activity.





## Making good decisions – our ‘can we?’ ‘should we?’ test

While our Code of Conduct and the underpinning policies seek to clarify what is expected of all of us, they cannot cover every specific scenario or decision made.

Every decision and choice should be aligned with our Purpose and Values – ask not only, ‘can we?’, but ‘should we?’.

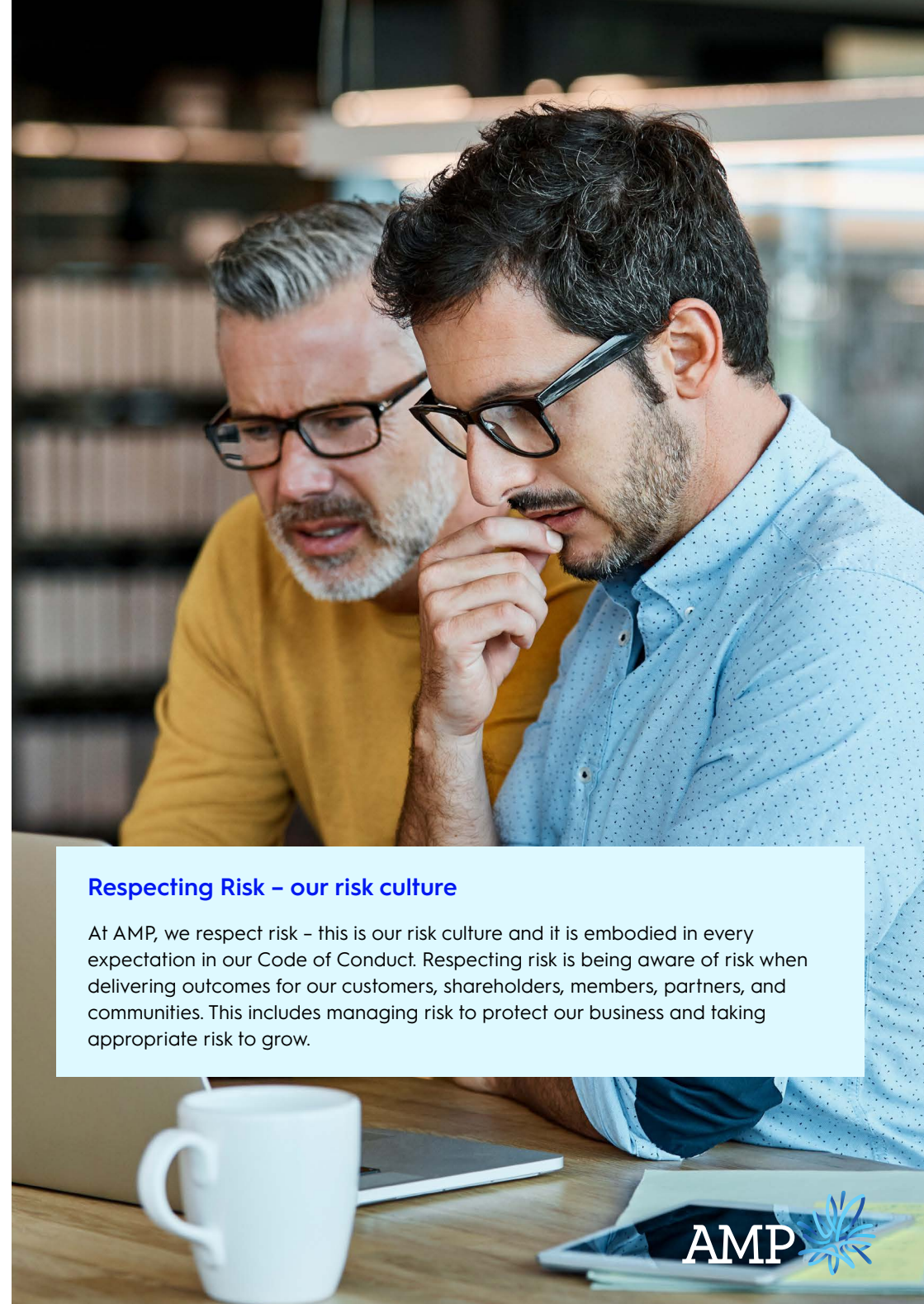


### If you are unsure or in doubt:

- Test your thinking with a peer
- Seek advice from your leader, Legal or Enterprise Risk Management
- Raise your question through the People Help Desk
- Reach out to your business People & Culture representative

### Respecting Risk – our risk culture

At AMP, we respect risk – this is our risk culture and it is embodied in every expectation in our Code of Conduct. Respecting risk is being aware of risk when delivering outcomes for our customers, shareholders, members, partners, and communities. This includes managing risk to protect our business and taking appropriate risk to grow.



# Put customers first

*"We are here for our customers. Their experience and outcomes matter to us. We consider customers in all our decisions and make it as simple as possible for them to take control and achieve their goals."*

Fair and ethical outcomes for our customers are at the heart of what we do and how we deliver.

*This means:*

- We are honest, transparent and clear with our customers to ensure they have the information they need to make informed decisions.
- We only provide advice and information to customers that we are qualified and authorised to provide.
- We only provide products and services that are right for our customers and match their needs and circumstances.
- When making changes or decisions we always consider the interests of our customers and our shareholders.
- We carry out our duties to the best of our ability, with due care and diligence, and collaborate across AMP, striving for the highest standards of service and performance for our customers and shareholders.





# Own it

*"Accountability starts and stops with all of us. We hold ourselves and each other accountable, honour our commitments, move quickly to execution, and deliver results."*

Both 'what we do' and 'how we do it' matters at AMP. This means fulfilling our commitments and taking ownership of our obligations and responsibilities, as well as any mistakes.

*This means:*

- We take accountability for our decisions and exercise sound judgement to ensure our behaviours and actions reflect our Values, and comply with policies, Code of Conduct, the law and other standards and regulations that apply to us and our work, and do not cause damage to AMP's business or reputation.
- We promptly and appropriately report concerns about dishonest, unethical, unlawful, or unsafe behaviour, and take steps to ensure that our concerns are being addressed, and where they are not, we escalate.
- We help protect AMP, our customers, shareholders, and the community against financial crime, including of fraud, theft, bribery, money laundering, or terrorism financing activities.
- We promptly and appropriately report any errors or omissions, we work to fix them and learn from our mistakes.
- We act within our authorisation and delegation level when making business decisions and when helping our customers.
- We fulfil all training, education and professional development requirements relevant to our role and ensure we understand the policies, standards, guidelines and procedures that apply to us and our work.



# Be Brave

*"Courage empowers us to have a go and chase after our priorities. We speak up, think big and try new ways of doing things. If something isn't working, we fail fast, adapt, and learn."*

To position AMP for success, we must be courageous and create an environment where everyone is supported to speak up, share ideas or concerns, learn from mistakes and confront tough issues.

*This means:*

- We are agile, drive continuous improvement and embrace new ways of doing things to create better outcomes for each other, our customers, shareholders, and all other stakeholders.
- We take considered risks that are within our risk appetite.
- We acknowledge that we will not always get it right, but when we make mistakes, we take accountability, act promptly to resolve, escalate, learn from them and improve.
- We speak up when things don't seem right and create a safe and supported environment for others to do so too.





# Play as one team

*"When we play as one team, we achieve more. We break down silos and come together quickly to solve problems and kick goals, playing to our strengths, and sharing our wins and losses."*

## We respect each other

Treating each other with dignity and respect, and valuing diversity and inclusiveness, fosters a work environment where people are safe and can grow, thrive, and bring their best selves to work. When we do this, we play as one team, and we achieve better decisions, outcomes and experiences for each other, our customers, shareholders, and all other stakeholders.

*This means:*

- Our decisions and interactions with others are always respectful and fair.
- We are inclusive, and we value diversity and everyone's contribution.
- We respect each person's human rights and do not engage in bullying, unlawful discrimination, harassment, sexual harassment, sex-based harassment, victimisation, forced or involuntary labour, or other unreasonable conduct at work.
- We make employment decisions and evaluate performance fairly, based on merit, skills and the requirements of the role, and not on personal characteristics irrelevant to the role.
- We understand that behaviour which may be acceptable to us may not be acceptable to others, and we seek feedback and adjust our behaviour to work effectively with different people.
- We hold each other to account and appropriately call out unreasonable or disrespectful behaviour, and speak up to raise issues with leaders or People Team representative when appropriate.
- We support and encourage others and don't victimise anyone for speaking up.



## Play as one team *continued*

### We work safely

It is our shared responsibility to take all reasonable steps to ensure our work environment is psychologically and physically safe for everyone. Our actions and behaviours will foster a culture that protects, promotes and supports the health, safety and wellbeing of our people.

*This means:*

- We follow all reasonable directions and take responsibility for our own health and safety and that of our colleagues.
- We identify, assess, manage and monitor physical and psychosocial hazards and risks (including, among other things, bullying, harassment, and sexual harassment).
- We report and manage safety incidents and injuries to ensure issues are resolved, action plans agreed, and wellbeing is supported.
- We speak up about any unsafe and/or unethical workplace practices.
- We support healthy, safe and sustainable ways of working to ensure we have a positive impact on our people and the community.





# Do the right thing

*"Doing the right thing matters, even when no one is looking. We are respectful, act with integrity, and deliver on our promises. This is how we earn trust."*

## We act ethically, with integrity and honesty

Working with high ethical standards, honesty and integrity, is more than meeting legal obligations - it is about doing the right thing, even when no one is looking. It builds trust and confidence in AMP, which is critical for our success.

*This means:*

- We are ethical, trustworthy, honest, fair and transparent in our dealings with each other, our customers, shareholders, regulators, business partners, suppliers and other stakeholders - we must always ask ourselves, 'should we?', in addition to 'can we?'.
- We act lawfully and comply with our legal and regulatory obligations, internal standards, policies and procedures, and other rules that apply to us.
- We comply with the lawful and reasonable directions given by our manager or someone with the authority to give those directions.
- We never act in a way that is dishonest, fraudulent, corrupt or unethical, nor attempt to conceal or turn a blind eye to any such activity or help anyone else to do so.
- We compete and operate fairly and never engage in anti-competitive practices, or conduct that is deceptive, misleading, dishonest, unconscionable, corrupt or unethical (or in a way that may be perceived as being any of these things).
- We identify, disclose and manage any conflicts of interest (actual, apparent or potential) appropriately and always put the needs and interests of AMP and our customers and shareholders ahead of our personal interests when doing our job.
- We do not improperly use our position within AMP, or any information we receive through our work, for personal gain or for anyone else.
- We never accept, offer or pay any bribes or kickbacks, nor gifts or other benefits that affect or may affect (or appear to affect) impartiality.



## Do the right thing *continued*

### We protect privacy and confidentiality

In our work we have access to confidential information including sensitive and personal information related to AMP, each other, and our customers, shareholders, business partners, suppliers and other third parties. To maintain their trust, we uphold the highest security standards for all confidential, sensitive and personal information.

*This means:*

- We only collect, access, use, disclose and retain confidential and sensitive information for the purpose for which it is obtained and in accordance with law and we securely dispose of that information when appropriate.
- We protect customer information and never access our own personal customer information or that of our family, friends, colleagues or public figures, unless there is legitimate reason to do so.
- We only provide confidential or personal information to our colleagues where it is required for work purposes.
- We only share AMP information externally for legitimate AMP work purposes or if it is expressly categorised as public information.





## Do the right thing *continued*

### We respect AMP assets

AMP's operations depend on the effective use of technology, information, data, and intellectual property. These assets are vital to our success, and their secure and proper management is essential. Each of us contributes to AMP's 'human firewall'.

*This means:*

- **Responsible Handling:** We manage AMP's technology, information, data, and intellectual property responsibly, ethically, and legally, ensuring due care at all times.
- **Authorised Use:** We use only AMP-provided or approved assets for our work and do not remove or duplicate sensitive or confidential information from AMP systems or offices, including in electronic form.
- **Careful Access:** We handle AMP information and intellectual property with care, accessing it only for legitimate business purposes and not sharing it with unauthorised individuals.
- **Security Protocols:** We protect our passwords and access cards, using them exclusively for our own access, and adhere to protocols and procedures for system logons, profiles, and passwords.



## Additional responsibilities of people leaders

People leaders have an important responsibility and play a critical role in influencing behaviour and creating a work environment where our Code of Conduct is brought to life in everyday activities so that teams understand and adhere to our Code of Conduct. If you are a people leader or manage, supervise or direct the work of others you are expected to.

If you are a people leader or manage, supervise or direct the work of others you are expected to:

- Consistently role model our Purpose, Values, Leadership spark at all times.
- Communicate and set clear expectations for your team about adhering to our Code of Conduct.
- Help your team understand our Code of Conduct and what it practically means within the context of their role, team and business unit.
- Recognise and reward behaviours and actions that demonstrate our Code of Conduct.
- Be clear and consistent on consequences of failing to adhere to our Code of Conduct.
- Encourage and normalise speaking up by creating a safe and supportive environment where team members feel comfortable to raise any issue or concern, and by listening and taking appropriate action.
- Identify breaches of our Code of Conduct early, take action to address them, escalate where appropriate and follow up to ensure action has been taken – don't shy away from tough conversations or decisions.
- Respect risk and encourage the same in others.

AMP has a Leadership Expectations framework known as our Leadership Spark, which outlines what is expected of our leaders, and is key to fostering the culture at AMP – [click here](#) to find out more





# Speak Up and Be Supported

AMP is committed to fostering a culture that encourages employees to raise concerns with trust and confidence and without fear of reprisals. If you know about or suspect a breach of our Code of Conduct or our policies or procedures, or have concerns about behaviours or conduct, we encourage you to speak up and raise a concern.

We will listen and take action – everyone involved will be treated fairly and respectfully, and safety and wellbeing will be prioritised and supported. Anyone seeking to raise a concern can speak with their immediate leader, or any other trusted leader at AMP, or can raise their concern through any one of the other channels available.

<a href="#">P&amp;C business unit contact</a>	Full contact details for each channel are contained on the Hub – <a href="#">click here</a> to find out more.  If you are not on the AMP network, you can find contact details by simply clicking on the channel you want.
<a href="#">People Help Desk</a>	
Health, Safety & Wellbeing Team	
<a href="#">Workplace Relations Team</a>	
<a href="#">Financial Crime Team</a> (including <a href="#">anti-money laundering</a> )	
<a href="#">Fraud Team</a>	

You have a choice about where you go and with whom you speak, and, if you choose the Whistleblowing channel, you may remain anonymous. Report concerns through the channel that feels right for you.

**Note:** Nothing in this Code of Conduct or any AMP policy prevents anyone from speaking directly with government agencies, regulatory authorities, or law enforcement agencies about actual or potential contravention of laws or regulations. You don't need to inform AMP or gain permission to do this.

## You can speak up anonymously by contacting

Australia:	1300 790 228
International:	+61 3 9895 0012
Email:	<a href="mailto:amp@yourcall.com.au">amp@yourcall.com.au</a>
Online:	<a href="https://yourcall.com.au/report">yourcall.com.au/report</a> using 'AMP1849' as the organisation ID
Mail to:	Locked Mail Bag 7777, Malvern VIC 3144 Australia

If you are deaf, or have a hearing or speech impairment, you can contact Your Call online or via Relay Service. Simply choose your contact method at [relay.service.gov.au](https://relay.service.gov.au) and request Your Call's hotline on 1300 790 228.

## Victimisation is not acceptable

AMP does not tolerate any form of retaliation against someone for speaking up and reporting concerns in good faith, or for participating in any investigation or enquiry.



# Consequences for breaching our Code of Conduct

If anyone is found to have breached their obligations under our Code of Conduct or related policies, they may be subject to disciplinary action, in accordance with AMP's Consequence Management Policy. This may include, but is not limited to:

- training or re-training
- counselling or warnings
- impacts to remuneration
- termination of employment (with or without notice).

Where that person is not an AMP employee, Code of Conduct breaches will be referred to their employer or principal for appropriate consequences to be applied.

In cases of a breach of law, there may also be legal consequences for the person involved. AMP will comply with all obligations to notify appropriate authorities when a breach (or suspected breach) of the law has been identified.

AMP will comply with all regulatory obligations and protocols in relation to breaches or misconduct, including, but not limited to, the ABA 'Banking Industry Conduct Background Check Protocol', and required disclosures to APRA and ASIC in relevant cases.

The Board or a committee of the Board will be informed of all material breaches of our Code of Conduct and AMP policy.





## More information

**Our Code of Conduct is underpinned by AMP policies, standards, guidelines and legal and regulatory requirements.**

More information about key obligations and responsibilities set out in our Code of Conduct can be found in our policies.

Our Code of Conduct does not form part of any contract of employment or contract of engagement, nor does it give rise to any legal or contractual obligation or representation by AMP.

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## Reviewing our Code of Conduct

Our Code of Conduct will be reviewed periodically to ensure its continued relevance and effectiveness. Our Code of Conduct is approved by the AMP Limited Board. It is published both internally on the Hub and publicly on the AMP website for our external stakeholders.



