



AMP Code of Conduct

2023



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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

Alexis George

“The AMP Code of Conduct isn't a strict set of rules to cover every potential decision-making 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”

Debra Hazelton
Chairman of AMP Limited Board

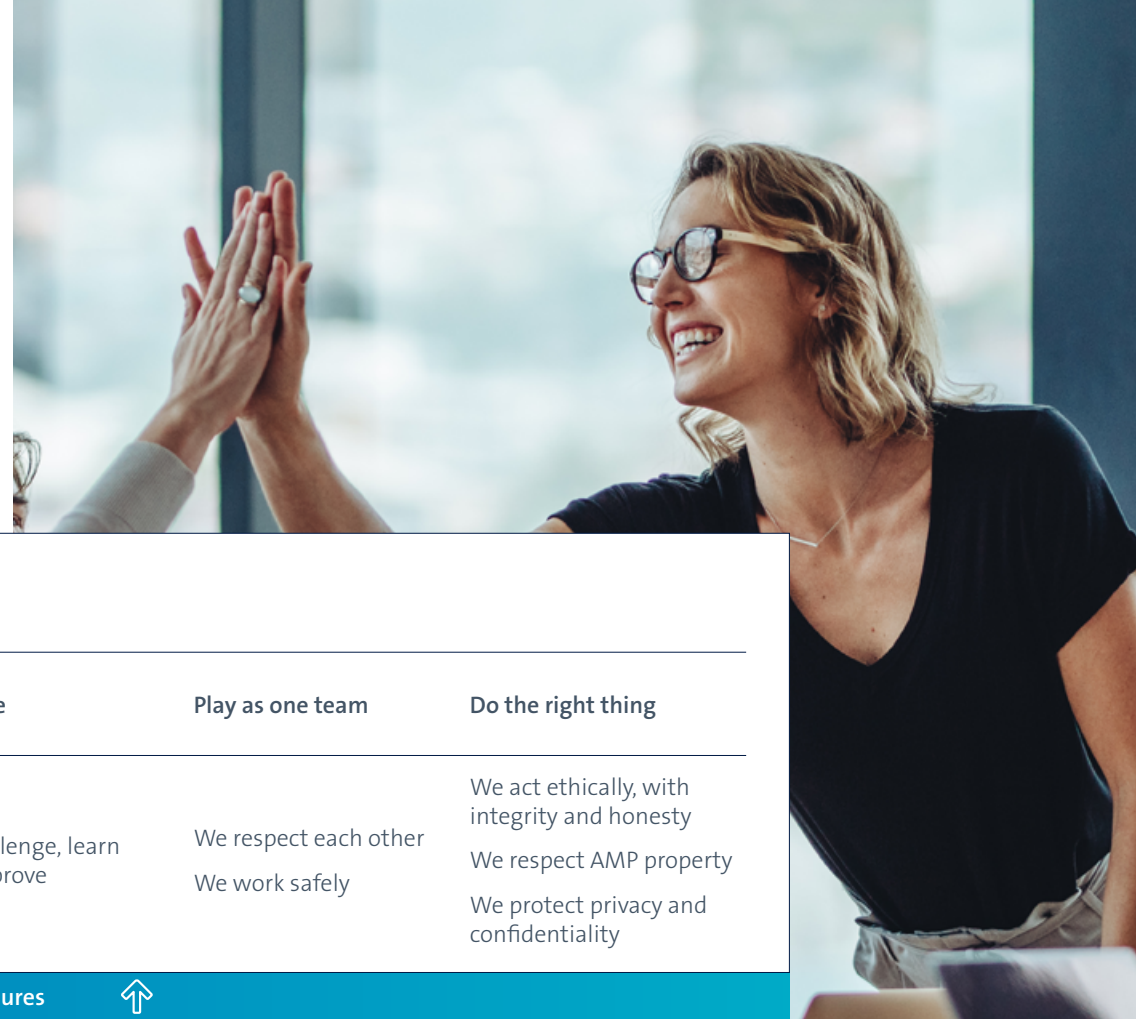







Our Code of Conduct

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	<i>Helping people create their tomorrow</i>				
	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
- Raise your question through PeopleHELPDESK
- Reach out to your business P&C 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, advisors, 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 polices, 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:

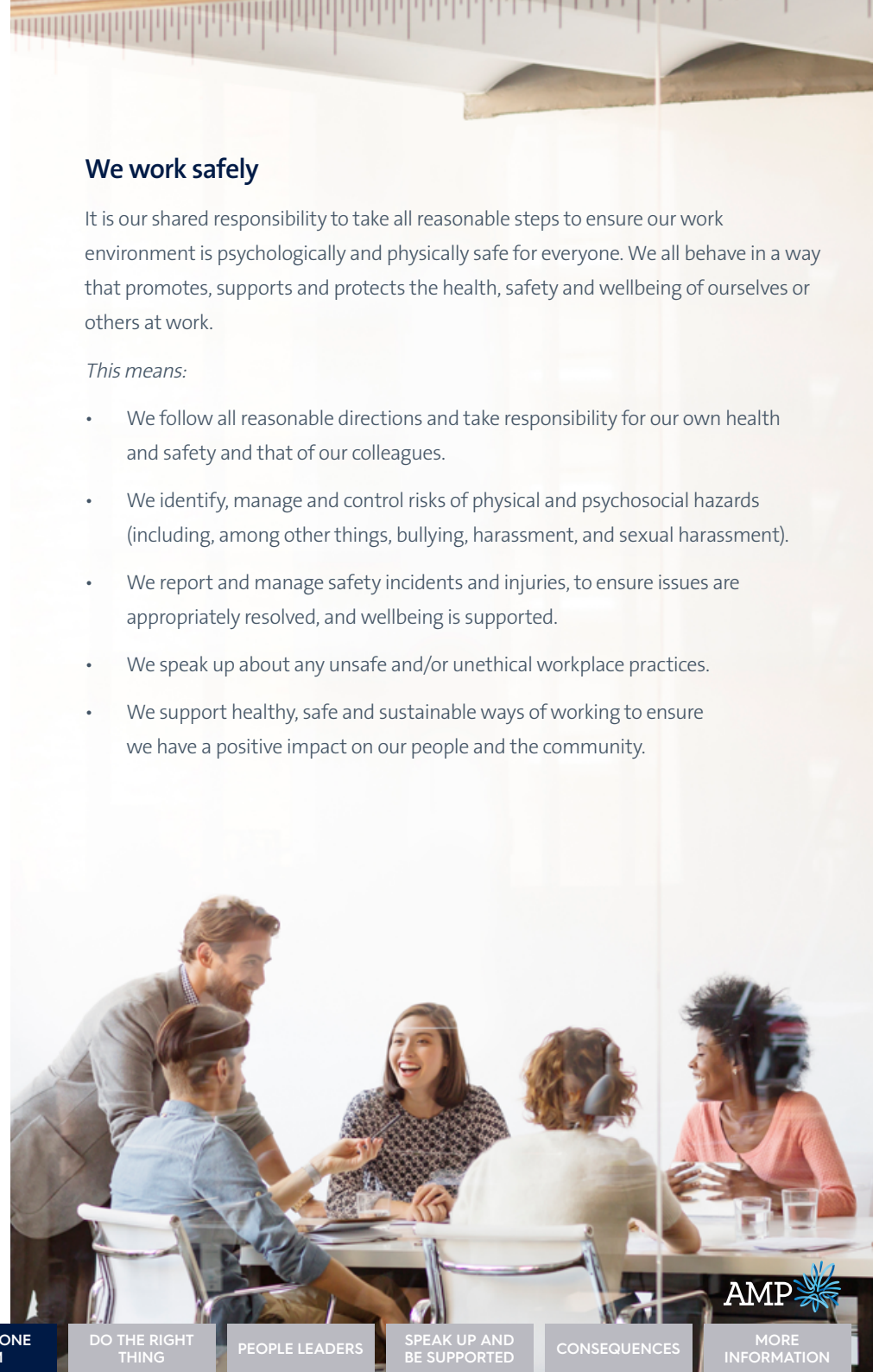
- Our decisions and interactions with others are always respectful and fair.
- We are inclusive, and we value diversity and everyone’s contribution.
- We respect each person’s human rights and do not engage in bullying, unlawful discrimination, harassment, sexual harassment, victimisation, forced or 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.
- We support and encourage others and don’t victimise anyone for speaking up.

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. We all behave in a way that promotes, supports and protects the health, safety and wellbeing of ourselves or others at work.

This means:

- We follow all reasonable directions and take responsibility for our own health and safety and that of our colleagues.
- We identify, manage and control risks of physical and psychosocial hazards (including, among other things, bullying, harassment, and sexual harassment).
- We report and manage safety incidents and injuries, to ensure issues are appropriately resolved, 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 in AMP, which is critical for our success.

This means:

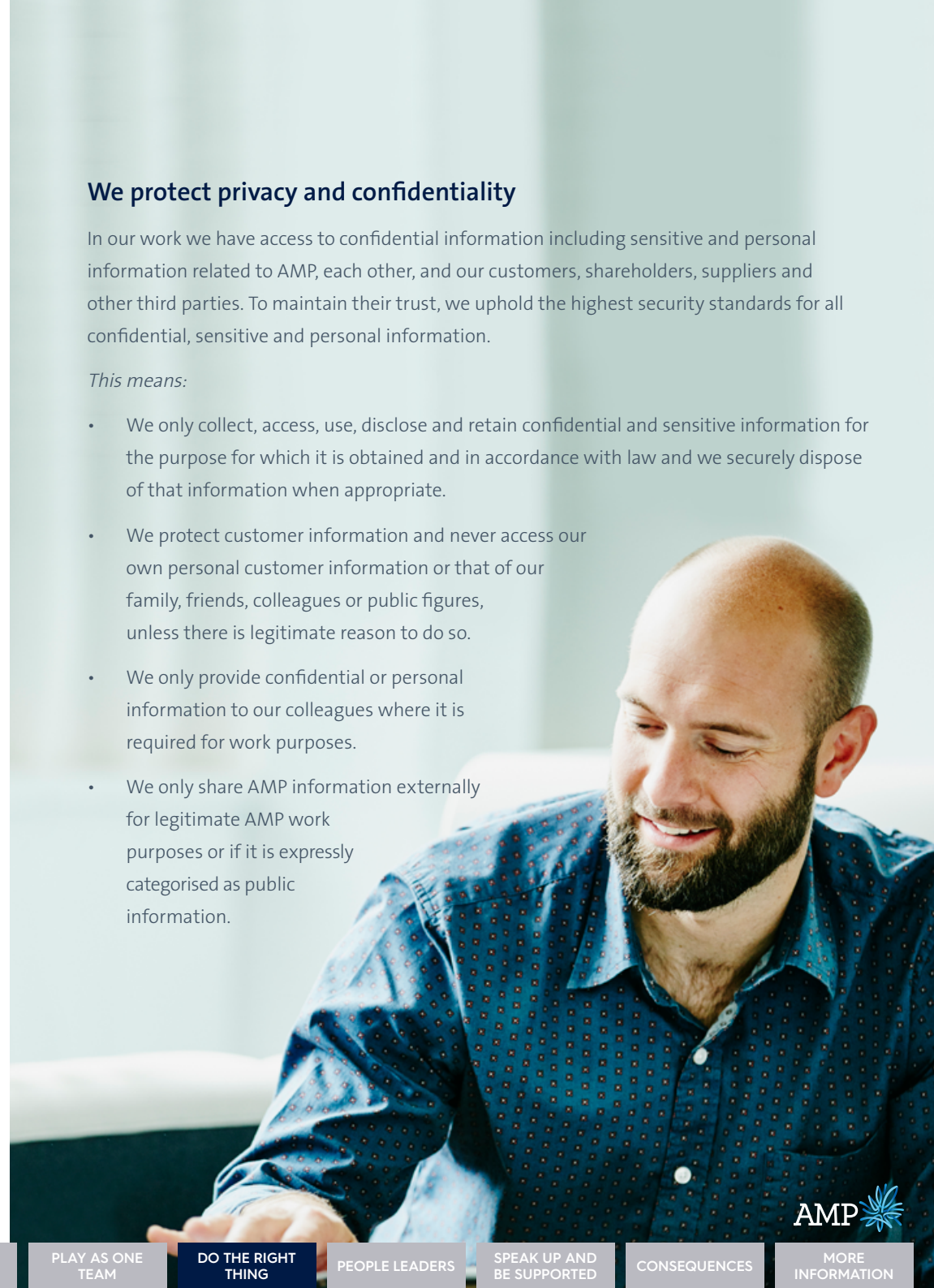
- We are ethical, trustworthy, honest, fair and transparent in our dealings with each other, our customers, shareholders, regulators and other stakeholders – we always ask ourselves, ‘should we?’ in addition to ‘can we?’.
- We act lawfully and comply with our legal and regulatory obligations, internal standards and policies, and other rules that apply to us.
- We never act in a way that is dishonest, fraudulent, corrupt or unethical, nor attempt to conceal 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 such).
- 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.
- We never accept, offer or pay any bribes or kickbacks, nor gifts or other benefits that may affect (or appear to affect) impartiality.

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, 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 relies on the use of technology, information, data, and intellectual property to conduct our business. These assets are our lifeblood and so ensuring that they are securely and appropriately managed and used is critical to our ongoing success. We all play our part as AMP's 'human firewall'.

This means:

- When handling AMP technology, information, data, and intellectual property, we act responsibly, ethically, and legally and ensure we take due care.
- We only use AMP-provided or approved assets to perform our work and do not remove or duplicate any sensitive or confidential information from AMP systems or offices, including in electronic form.
- We are careful with AMP information and intellectual property. We only use or access it when we have legitimate business reason to do so and do not share or discuss it with anyone who does not need to know it.
- We safeguard our passwords and access cards for our use only and follow protocols and procedures relating to 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:

- **Lead with Purpose and Values**, consistently role modelling our Purpose, Values and Code of Conduct expectations 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 how it can be brought to life 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 which outline 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

If you suspect a breach of our Code of Conduct or our policies, speak up and raise a concern. AMP 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 the matter through any one of the other channels available:

P&C business unit contact	<p>Full contact details for each channel are contained on the Hub – click here to find out more.</p> <p>If you are not on the AMP network, you can find contact details by simply clicking on the channel you want.</p>
PeopleHELPDESK	
Whistleblowing Program	
Health, Safety & Wellbeing Team	
Workplace Relations Team	
Financial Crime Team (including anti-money laundering)	
Fraud Team	

You have a choice about where you go and with whom you speak, and 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.

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.

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.



