Code of Conduct
Policy of Legal Super Pty Ltd

This document sets out legalsuper policy for its standards of conduct and behaviour.

[SEC=INTERNAL]

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1. About This Document

1.1 Legal Super Pty Ltd (**legalsuper**) requires the highest standards of integrity and conduct from itself and all people who are engaged by it at all times.

1.2 This Code of Conduct (**Code**) governs how legalsuper and all its directors, employees, contractors and agents of legalsuper and any person or organisation that acts for it (**Personnel**) must conduct themselves in the performance of their duties at all times. legalsuper as Trustee of the legalsuper Fund, will at all times act in the best financial interests of beneficiaries of the Fund.

1.3 The Code is to be read in conjunction with legalsuper's policies, including but not limited to the Governance Framework, Investment Governance Framework, Conflicts Management Framework, Fit and Proper, Expenditure, Equality, Diversity & Inclusion, Anti-discrimination, Harassment & Bullying, Whistleblower and Respect in Our Workplace Policies, Risk Management Framework, and Charters of the Board and its Committees.

2. Our Values

2.1 The Code is underpinned by our values, which represent our highest priorities, deeply held beliefs, and core fundamental driving forces. They are the heart of what we and our people stand for.



Excellence

- We are committed to bringing our very best to work and being high performing in everything we do.
- We relentlessly pursue the highest quality of service, to exceed expectations.
- We challenge the status quo driving better outcomes for members.

3. Our Conduct

3.1 All Personnel must conduct the business of legalsuper with the highest level of ethics and integrity, in accordance with our values. This obligation applies to dealings with shareholders, customers, suppliers, competitors, governments, regulators, other Personnel and all other stakeholders.

3.2 All Personnel must:

a) treat all people with dignity, courtesy, honesty, fairness and respect at all times and in all forms of communication;

b) respect and be sensitive to cultural or ethnic backgrounds;

c) not use offensive, abusive or inappropriate discriminatory language;

d) contribute to an amicable working atmosphere;

e) maintain fair, open and honest relationships;

f) willingly accept flexibility of jobs and duties, within their individual skills and abilities;

g) observe, at all times, the highest standards of professionalism and adhere to all legalsuper policies;

h) operate carefully and safely, keeping the workplace and our environment free of safety and environmental hazards and complying with occupational health and safety laws;

i) provide accurate information to members/employers and other third parties about legalsuper's services and products;

j) conduct business with honesty, integrity and fairness;

k) maintain professional relations with third party suppliers and advisers;

l) not engage in any false or deceptive practices;

m) comply with all applicable laws and regulations, including those relating to theft, harassment and discrimination;

n) understand that every one of us has an obligation to be familiar with the law and we will, with the support of legalsuper's policies and training resources, inform ourselves about applicable legal requirements before acting on legalsuper's behalf;

o) not divulge confidential information about legalsuper, its members, personnel or suppliers without proper authorisation;

p) use Ai technology ethically, including not sharing sensitive information without proper data anonymisation and security measures in place;

q) avoid conflicts of interest as well as the appearance of a conflict of interest and make full disclosure to legalsuper where a potential or actual conflict of interest exists, subject to law;

r) use legalsuper's name and logo only in the manner authorised and approved by legalsuper;

s) address complaints in a timely and appropriate manner in accordance with legalsuper's Internal Disputes Resolution Policy; and

t) not participate in any illegal or unethical activity or other activity that may put the reputation of the Fund at risk.

4. Compliance Responsibilities

4.1 Personnel are responsible for understanding and complying with the Code and immediately reporting any circumstances which may involve deviation from the Code to their manager, an Executives, the General Manager, People & Culture, CEO or Chair as appropriate.

4.2 Any Personnel concerned about possible repercussions should make their report under the Whistleblower Policy.

4.3 Any Personnel who deal with contractors, consultants or agents who represent legalsuper must make them aware that legalsuper expects them to conduct their business in accordance

with the Code.

4.4 Managers are accountable and responsible for:

a) understanding and complying with the Code;

b) immediately reporting any circumstances which may involve deviation from the Code to their manager, an Executive, General Manager, People & Culture , CEO or Chair as appropriate; and

c) assisting their employees to understand and fulfil their responsibilities under the Code.

5. Breach of Policy

5.1 A breach of this Code may result in disciplinary action. Depending on the severity of the breach, this may include a verbal or written warning, or—where warranted—termination of employment or engagement with legalsuper.

5.2 Any grievance or complaint made about an employee should be reported to the employee's Executive and/or General Manager, People and Culture, and will be dealt with in line with legalsuper's grievance procedure.

5.3 Any grievance or complaint made about the CEO or a Director will be dealt with by the Chair of the Board, or if about the Chair, by the Chair of the Audit, Risk & Governance Committee.

6. Review and approval

6.1 No less than every three years or earlier if there is a material change to the size and/or complexity of legalsuper's operations or business, the Remuneration & Nomination Committee will review this Code or as otherwise considered appropriate.

6.2 Any changes to this Code must be approved by the Board.

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