

# ClearView Wealth Limited

ABN 83 106 248 248

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ClearView Group  
Code of Conduct

# ClearView Group Code of Conduct

## Document Control & Version History

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## Record of Amendments, Authorisations & Issues

Version	Revision Date	Drafted by	Nature of Amendment	Approval Required
1.0	11 June 2011	Legal and Compliance	Minor Amendments	CWL Board
2.0	5 December 2017	Legal and Compliance	Minor Amendments	BRCC
3.0	19 September 2014	Legal and Compliance	Material Revisions	CWL Board
4.0	5 December 2017	Legal and Company Secretariat	Minor Amendments	BRCC
5.0	22 June 2021	Chief People Officer & Company Secretariat	Material Revision Update to accommodate ASX Corporate Government Principles and Recommendations 4 <sup>th</sup> Edition	CWL Board
6.0	June 2022	Chief People Officer & Company Secretariat	Incorporate ESG provisions and dealings with partners	CWL, CLAL, CLN CFML, Boards
7.0	June 2023	Chief People Officer & Company Secretariat	No amendments. Update format. Removed MD introduction	Board Noted
8.0	March 2024	Chief People Officer & Company Secretariat	Update to reflect the exit from the wealth management businesses and the Positive Duty under the Sex Discrimination Act 1984 (Cth)	GE, General Counsel & Corporate under Delegation

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9.0	January 2025	Chief People Officer & Company Secretariat	Update for introduction of FAR and CPS 230	CWL, CLAL Boards

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## Messages from our Board

The ClearView Board, as the Company's leaders, recognises that the Code of Conduct is the critical guide which underpins Our Culture, Our Actions and Our Decisions. This Code of Conduct informs us and our partners about how we deliver ClearView's Purpose and live our Values.

The Board as a team is committed to living the Code and instilling its message. Ultimately, the Board recognises that how ClearView delivers its services is just as important as the services themselves.

**Geoff Black**

**Chair of the Board**

# 1. Purpose

- 1.1 The Code of Conduct (**Our Code**) sets expectations for how we should act and how we make decisions at ClearView Group (**ClearView**). It shapes how we deliver outcomes to our customers, how we work with our partners and stakeholders and how we impact the community and the environment we live in.
- 1.2 This Code applies to ClearView Wealth Limited and its subsidiaries (ClearView) and has been adopted by the Board of each respective ClearView entity.
- 1.3 Our Code applies to every one of us (employees, contractors, directors and other representatives) and shapes the relationships we have with the partners we align ourselves with. Each of us has a responsibility to read, understand and uphold Our Code.

## 1.4 What ClearView expects of you:

Read and understand Our Code and reflect on how it applies in your daily role, your interactions with customers, partners and each other.

If there is a new challenge, refer to Our Code as a guide and raise any concerns with your colleagues and Manager.

If you have concerns about how ClearView is undertaking its interactions – any wrongdoings (as defined in the Whistleblower Policy) whether that be breaches of internal rules and policies, breaches of laws and regulations or where the behaviour could be damaging to ClearView's reputation - feel supported to raise these with your Manager or escalate them appropriately.

If you are unsure of anything, discuss it with your Manager.

## 1.5 What you can expect from ClearView:

- Overt and active support of Our Code from the Board and the Executive Leadership Team.
- Regular training, education (and where necessary certification) about our Values and Our Code and how they impact how you contribute to the purpose of ClearView.
- Clear and consistent set of expectations that everyone will adhere to Our Code.
- Clear consequences of not following Our Code or breaching it.
- Assistance in reviewing and solving new challenges.
- A safe environment if you formally raise any potential or real wrongdoings.

## 2. Our Values

ClearView's Values are extremely important. They are a belief system and act like a compass, guiding all our decisions. They are a core part of our identity and reflect how we conduct business. They are:

- 2.1 **Persistence:** We're never satisfied when it comes to doing better and we never give up on our people, our customers, our partners and the moments that matter. Nothing really good has ever come about because someone gave up. So, if there's a better way to do it, we'll find it.

*"Ambition is the path to success, PERSISTENCE is the vehicle you arrive in."*

- 2.2 **Collaboration:** We believe that working together benefits our customer and that two heads are better than one, and a lot more fun. Three are better still. We want more perspectives not less. We are a group of like-minded, passionate people who turn up every day to share, help and be better than yesterday... together.

*"As you navigate through the rest of your life, be open to COLLABORATION. Find a group of people who challenge and inspire you, spend a lot of time with them, and it will change your life."*

- 2.3 **Integrity:** Giving your word... committing... promising... and then actually delivering! If these things come in shades of grey to you, we're not going to get along very well. Only 3 colours matter here – right, wrong and the vibrant pink on our logo.

*"If you have INTEGRITY, nothing else matters. If you don't have INTEGRITY, nothing else matters."*

- 2.4 **Authenticity:** We're also proud to never compromise when selecting our people and there's nothing we hate more than fake. Only positive, genuine people need apply. Honest people. Open. Able to say sorry and admit they were wrong. Tell it like it is. Argue their case but accept a decision. What you see is what you get.

*"The AUTHENTIC self is the soul made visible."*

### 3. Our Obligations

- 3.1 ClearView as an ASX Listed Company, is bound to meet our obligations and overtly demonstrate our adherence to this Code of Conduct. The ASX Corporate Governance Principles and Recommendations 4<sup>th</sup> Edition, articulate these obligations as:
- Act in accordance with Our Values and in the best interests of ClearView;
  - Act honestly and with high standards of personal and business integrity;
  - Comply with all laws and regulations that apply to ClearView and its operations;
  - Act ethically and responsibly;
  - Treat colleagues with respect and not engage in bullying, harassment or discrimination;
  - Deal with our customers, our shareholders and our partners fairly;
  - Disclose and deal appropriately with any conflicts between our personal interests and our duties as a director, senior management or as an employee;
  - Do not take advantage of ClearView property or its customers' information for personal gain or to cause detriment to ClearView or its customers;
  - Do not take advantage of your position, or the opportunities arising from your position, for your own personal gain; and
  - Report breaches of Our Code in accordance with our incident management policy.
- 3.2 ClearView's Accountable Entities and any Significant Related Entities are also required to act in accordance with its obligations under the Financial Accountability Regime.
- 3.3 Within the ClearView Group our Life Insurance subsidiary has obligations to Policyholders under the Life Insurance Act and ClearView Wealth Limited has obligations to shareholders under the Corporations Act and ASX Listing Rules.
- 3.4 Our Values and Our Code will inform and provide a further guide in the selection, ongoing dealings and relationship we seek with our partners.
- 3.5 ClearView is committed to providing a safe, respectful workplace to all staff, that advances gender equality and eliminates discrimination, sexual harassment and victimisation.

## 4. Our Ethical Framework

### 4.1 Straightforward

*It is easy to work, partner, commit with ClearView*

- I understand what is required of my role and always meet these obligations
- I care about our customers, my colleagues, our partners and our community
- I follow through, I know what is expected of me and I am accountable

### 4.2 Transparent

*We are open and ensure we understand each other's expectations*

- I hold myself to high standards and expect the same of others, including our partners
- I raise issues, accept constructive criticism and seek to deliver optimum solutions
- I deliver and ensure that others do the same

### 4.3 Honest

*Without trust and honesty there is no foundation for a way forward*

- I act with integrity and challenge actions that are inconsistent with Our Values
- I ask 'should we' not just 'can we' to deliver outcomes to our customers and shareholders
- I am rewarded for great work and understand the consequences for doing the wrong thing

### 4.4 Fair

*We ensure everyone gets a fair go*

- I understand our customers, their needs and do my best to help them
- I resolve customer complaints fairly and quickly
- I fix problems quickly, learn from mistakes and ensure better solutions for the future



## The Critical Questions

I always ask:

- Should we do this, not just can we do this?
- Might this be a breach – is this legal?
- Does it meet ClearView's policies and expectations?
- Does this feel right?
- Am I harming anyone or the environment?
- Would my colleagues, our customers, our partners, our stakeholders say I am acting fairly and ethically?
- Will this be a positive outcome for ClearView, its customers, the community, the environment in the longer term?

I ask these questions - before I proceed and before I commit.

## 5. Our Code's Application

- 5.1 Our Code applies to everyone in ClearView, including setting the minimum standards for behaviour and conduct by those who provide products and services on behalf of ClearView.
- 5.2 Following Our Code is mandatory and is a key aspect of your employment or engagement with ClearView. Following Our Code will ensure we work in a consistent and ethical way to deliver better outcomes to our stakeholders. Not following Our Code can have serious consequences for you and ClearView, our customers, our stakeholders and our community.
- 5.3 If you breach Our Code, there are consequences. These may range from coaching and counselling so we collectively learn from our mistakes or, in serious cases, may lead to dismissal and/or ending your employment or engagement with us.
- 5.4 Our Code applies whenever you are present at ClearView (at the office or working remotely) including representing us outside the office. It also applies to behaviours which might cause damage to our reputation inside and outside office hours (e.g. at a social function).

## 6. Living Our Code

- 6.1 Our Code is here to help us do what is right and helps us to think about how we deliver outcomes, navigate tough decisions and challenge, where necessary, current norms. It reminds us that how we deliver services is more important than the services themselves.
- 6.2 It is not just a document. It is how we undertake our duties and an essential guide for our interactions. Each of us must take personal responsibility to read, understand and follow Our Code.
- 6.3 The ClearView Board and Executive Leadership Team will support Our Code by:
- Leading by example in everything they do;
  - Providing mandatory training and education in Our Values, Our Code, Our Risk Culture, and key Policies and responsibilities (at least annually);
  - Making appropriate certifications of compliance with Our Code and other relevant policies annually, or as often as required;
  - Keeping Our Values, Our Code and Our Risk Culture, Diversity and Inclusion Policy and responsibilities front of mind through regular communications and linkages to performance reviews, recognition and rewards and a pre-requisite for promotion;
  - Ensuring partners are selected, and relationships are modelled, to reflect a shared culture based on our Values, Our Code, Our Risk Culture and our commitment to the environmental, social and governance practice we hold and aspire to; and
  - Ensuring the Board and Executive Leadership Team have adequate reporting of any breaches and their resolution.

## 7. Speaking Up

- 7.1 We know that all ClearView employees want to do the right thing for our colleagues, our customers, our stakeholders, our community and our company, but sometimes the right approach or decision, isn't that obvious. When I ask myself the **critical questions**, sometimes something still does not feel right.
- 7.2 Challenging ClearView's approach, taking ownership to follow-up or even escalating your concerns are fundamental aspects of getting it right and an essential aspect of abiding by Our Code.

- 7.3 If you have any questions or concerns, raise them with your manager or a member of the Executive Leadership Team.
- 7.4 If your concerns involve your manager, we encourage you to refer the matter to a member of the Executive Leadership Team or a member of the People and Culture team.
- 7.5 If your concerns relate to *Reportable Conduct*, we encourage you to refer the matter to the Whistleblower Officer/s. Please refer to the ClearView Whistleblower Policy for further guidance.
- 7.6 We are committed to ensuring confidentiality and, if requested and appropriate, anonymity in respect of matters raised. We will support and protect the individual who may have concerns from any retaliation.

## 8. How We Manage Risk

- 8.1 Our Code, Our Values and Our Risk Culture guide and support our decisions and hence our outcomes. Critical to this is how we manage and mitigate risk. Managing risk is integral to our business and is demonstrated in our actions and the decisions of our people, Executive Leadership Team and Board. Our people and customers are at the centre of our risk culture and we commit to ongoing communication, escalation, constructive challenge and making considered decisions to manage risk consciously.
- 8.2 Where there is ambiguity, ClearView will firstly ask “*Should we?*” and then “*Can we?*”
- 8.3 Risk culture at ClearView is comprised of the following key elements:
- A defined and supported ClearView risk culture and risk management framework setting out our risk culture, appetite and strategies we have selected to mitigate risks
  - Our Values and Our Code
  - An ethos for being transparent
  - Focus on accountability
  - Committed leadership
  - Established and maintained risk governance framework and assessed controls

- Maintaining and constantly enhancing risk capabilities, our resilience and sustainability
- Simulating and testing our operational continuity management
- Aligned performance management and incentives
- Culture of decision-making and, where necessary, to challenge and escalate the path forward.

## 9. ClearView policies

9.1 Our Values and Our Code shape how we behave at ClearView. Our actions and decisions need to be consistent and guided by our stated policies and procedures. The standards of behaviour we expect at ClearView are based on shared Values and adherence to our stated policies, procedures and plans.

We have categorised our key Policies and the outcomes we expect into groups covering:

- Our Customers
- Our People
- Our Community

All staff should be aware of these Policies and, where appropriate/necessary, ClearView will require annual review and certification. These Policies are readily available and maintained on the ClearView Intranet.

### 9.2 Our Customer Policies

9.2.1 Our customers deserve and have our focus. When we make decisions affecting our customers, be aware of and follow the key Policies to ensure we deliver the right outcomes. We may add, remove or amend policies from time to time.

#### 9.2.2 Outcomes:

- Fair customer outcomes
- Products that are fair, transparent and meet customer needs
- Compassion is shown to our customers including those most vulnerable

- Complaints are dealt with fairly and in a timely manner
- Customer Privacy is respected and protected

### 9.2.3 Policies

- Product Development & Oversight Committee Charter
- Design & Distribution Obligations Framework
- Privacy Policy
- Complaints Handling Policy
- Incident and Breach Management Policies
- Information Security Policy
- Vulnerable Customers Policy
- Family & Domestic Violence Policy

## 9.3 Our People Policies

9.3.1 Our people are truly our best asset, and they are what differentiates ClearView. Our people are critical in achieving outcomes for our customers and ensuring that those outcomes are fair, transparent, and informed. When we make decisions that affect our people, please be aware of and follow the key Policies to ensure we achieve the right outcomes.

### 9.3.2 Outcomes:

- Our workplace is safe and inclusive
- People are hired, promoted, and rewarded when they live our Values and demonstrate the highest standards
- Individuals act within their stated authority and use ClearView assets responsibly
- People complete training and learning to ensure their competency for their position and hold relevant accreditations required for their role
- People take reasonable care for their own safety, physical and mental wellbeing, and that of

others

- People understand their personal obligations to prevent damage to ClearView, its stakeholders and their own brand, reputation and/or commercial interests or actions that may bring ClearView into disrepute, including their management, and where necessary, mitigation of any perceived or actual conflicts of interest.

### 9.3.3 Policies:

- Diversity and Inclusion Policy [Including Respect@Work]
- Conflicts of Interest and Related Party Transactions Policy
- Financial Accountability Regime [FAR] Policy
- Gift and Hospitality Policy
- Political Donations Policy
- Delegations of Authority Policy
- Anti-Bribery & Corruption Policy
- Complaints Handling Policy
- Fraud and Crime Prevention Policy
- Eliminating Discrimination and Harassment Policy
- Dealing with Bullying in the Workplace Policy
- Work Health and Safety Policy
- Whistleblower Policy

## 9.4 Our Community

- 9.4.1 We live and exist in a community. We have duties and obligations to do what is right by our community as a Good Corporate Citizen. We encourage our people and our partners to be caring and active members of the community, and to assist our communities in their endeavours in building sustainable futures. When we make decisions that affect our community, please follow the key Policies to ensure we achieve the right outcomes.

#### 9.4.2 **Outcomes:**

- We follow the regulations that guide us both in content and in spirit
- We will not tolerate insider trading and market manipulation
- We protect the integrity of the financial systems and rules that we and our counterparts operate within. Our governance promotes good leadership, decision making and outcomes that uphold Our Code, Our Risk Management Framework (RMF) including adherence to our agreed Risk Appetite and Risk Culture.

#### 9.4.3 **Policies:**

- Service Provider Management Policy
- Using Artificial Intelligence Policy
- Securities Trading Policy
- Anti-Money Laundering /Counter Terrorism Financing Program
- RMF including the Risk Appetite Statement (RAS) and Risk Culture Framework.
- Media and Communications Policy
- Corporate Governance Statement

## 10. Our environmental, social and governance responsibilities

- 10.1 Like any ASX-listed entity, ClearView has an obligation to actively manage environmental and social risks. But beyond this obligation and at the heart of what we do as a good and respected corporate citizen, is our capacity to care for our people, customers, and our community.

We recognise that responsible behaviour is our call to action, creating opportunities to generate greater value for our shareholders, while at the same time fostering socially responsible practices in the communities we serve and environment we live in.

We encourage our people and our partners to be caring and active members of the community, and to assist our communities in their endeavours in building a sustainable future.

## 10.2 Outcomes:

- We recognise that environmental and social risks can impact our business and our communities, and we are committed to ensuring that these risks are identified and managed appropriately.
- Where we can, we seek to select partners that model our Values and consider the well-being of the planet.

## 10.3 Policies:

- Service Provider Management Policy
- Modern Slavery Statement
- Corporate Governance Statement

# 11. Additional Expectations of our Leaders

11.1 Our Board, Executive Leadership Team and our managers uphold and help us to uphold the highest standards that we expect and help us to consistently live our Values and shape our culture.

11.2 If you lead a team, set the direction, or lead the work of others, ClearView expects that, as a leader, you will:

- Understand and deliver on your obligations that you personally are accountable for and authorised to undertake/oversight, under any relevant laws or regulations (and any additional responsibility for their compliance) as an Accountable Person under the Financial Accountability Regime or other relevant legislation.
- Set expectations for your team and staff on the outcomes being sought and the behaviours they are accountable for, by providing guidance, recognition, training, counselling and clarity for their consequences.
- Be a role model for Our Values and Our Code by being your team's champion and "*living the spirit*" of the intent through their actions and decisions.



- Uphold Our Code in operational and people management processes, rewards, recognition and any sanctions you use within your teams. Keeping the importance of Our Code current and alive, by constant referencing and providing practical application in how we do things at ClearView.
- Embed risk awareness in your team, for the areas they are responsible for, by ensuring they are aware of our RMF, including the RAS and Risk Culture Framework and regularly discussing their impact on their work and outcomes and fostering strong and constructive relations between your team and ClearView's risk and compliance and audit teams.
- Encourage speaking up by ensuring staff are encouraged and comfortable in challenging outcomes, including detecting, escalating, and remediating issues your team are responsible for.
- Understand WhistleBlower and Anti-Harassment Policies and procedures that encourage staff to safely report such issues. Understand the leader's obligation and limits to resolve these issues and how to encourage escalation and reporting through the appropriate designated channels.

## 12. Working with External Service Providers - *Our Partners*

- 12.1 The external service providers - *Our Partners* are integral to our ability to provide our services and our products, and they directly or indirectly impact our key stakeholders. As such, our partners are expected to uphold the spirit and intent of our Values and Our Code.
- 12.2 Like all relationships, those we have with our partners must be constantly developed and assessed. Undertaking periodic performance reviews and risk assessments where required, will assist in achieving the best outcomes for our stakeholders.
- 12.3 ClearView has no tolerance for modern slavery and we seek opportunities to mitigate these risks from within our business operations, across our supply chain, and in our dealings with suppliers. ClearView publishes its Modern Slavery Statement on its website at [clearview.com.au/governance/](https://clearview.com.au/governance/).
- 12.4 Our expectations in dealing with our key Partners is outlined in our **Service Provider Management Policy**:

In our dealings with partners, we will:

- Conduct appropriate partner due diligence throughout the lifecycle of engagement;
- Include modern slavery provisions into all our contractual agreements;
- Co-ordinate areas of improvement where non-compliance is identified;

- Comply with relevant laws and regulations that impact ClearView;
- Undertake and maintain appropriate monitoring, analysis and reporting of operational risks (obligations outlined in APRA Prudential Standard CPS 230 *Operational Risk Management*)
- Include our key Partners in designing and testing our Business Continuity Policy and Plans and working together on any remediation;
- Include our key Partners in designing, implementing and testing our data security, retention, privacy policies practices and working together on improvements and efficiencies;
- Comply with ClearView's Conflicts of Interest Policy, procedures and reporting requirements; and
- Act in the best interest of ClearView, our customers, stakeholders, and our community.

## 13. Publication and review of Code of Conduct

13.1 This Code of Conduct will be made available on the Company's website and intranet.

13.2 This Code of Conduct is reviewed at least every 2 years or after any material corporate compositional change.