



ClearView Wealth Limited

ABN 83 106 248 248

Code of Conduct

22 June 2021

Document Control & Version History

Policy	Code of Conduct
Number	7
Document Owner	Chief People Officer

Record of Amendments, Authorisations & Issues

Version	Revision Date	Drafted by	Nature of Amendment	Approval Required
1.	11 June 2011	Legal and Compliance	Minor amendments	CWL Board
2.	24 August 2012	Legal and Compliance	Minor amendments	BRCC
3	19 September 2014	Legal and Compliance	Material Revisions	CWL Board
4	5 December 2017	Legal and Company Secretariat	Minor amendments	BRCC
5	22 June 2021	Chief People Officer & Company Secretariat	Material Revision Update to accommodate ASX Corporate Government Principles and Recommendations 4 th Edition	CWL Board

Messages from our Managing Director and the ClearView Board

Message from the Managing Director

At ClearView our purpose is to assist Australians grow and protect their wealth by providing transparent and trusted life insurance, wealth management and advice solutions to achieve our customers financial and wellbeing goals. We do this by delivering effective, sustainable financial products and services while being easy to do business with, for financial advisers and customers.

'Our Code of Conduct' brings this purpose and Mission to life as a guide and reference to our people and those that represent ClearView. It helps us make the right decisions and do the right things even where we face difficult challenges.

Our Code sets the boundaries for our decisions, and more importantly our actions, to ensure that they are ethical and maintain our high levels of integrity. It also provides clear steps for dealing with challenges.

Our Code is founded and supported by our core values of:

1. Persistence
2. Collaboration
3. Integrity
4. Authenticity

In our dealings we are:

- Straightforward
- Transparent
- Honest
- Fair

These signpost our culture and the way we do things at ClearView, whilst helping to create unique experiences for each other, our customers, our stakeholders, and the community.

The Code of Conduct establishes benchmarks for our behaviours, our actions, our decisions and sets expectations for what it means to be part of the ClearView team.

Simon Swanson
Managing Director

Message from the Board

The ClearView Board, as the Company's leaders, recognise that the Code of Conduct is the critical guide which underpins Our Culture, Our Actions and Our Decisions. It informs us and our partners in 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

The Code of Conduct (**Our Code**) sets expectations for how we should act and how we make decisions at ClearView. It shapes how we deliver outcomes to our customers, how we work with our partners and stakeholders and how we impact the community we live in.

Our Code applies to every one of us (employees, contractors and directors) 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.

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, review Our Code as a guide and raise any concerns with your colleagues and Manager.
- If you have concerns about how ClearView is undertaking its interaction – 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.

What you can expect from ClearView:

- Overt and active support of Our Code from the Board and the Senior Management 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:

- **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.
- **Collaboration:** We believe that working together benefits the 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."

- **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.”
- **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

ClearView as an ASX Listed Company, is bound to meet obligations and overtly demonstrate our adherence to these principles. The ASX Corporate Governance Principles and Recommendations, 4th Edition, articulate these obligations as:

- act in accordance with Our Values and in the best interests of the ClearView;
- act honestly and with high standards of personal integrity;
- comply with all laws and regulations that apply to the ClearView and its operations;
- act ethically and responsibly;
- treat fellow 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 the property or information of ClearView or its customers for personal gain or to cause detriment to ClearView or its customers;
- do not take advantage of your position, or the opportunities arising there, for your own personal gain; and
- report breaches of the code to the appropriate person within ClearView.

ClearView is also a RSE licensee under the SIS Act with obligations to Members/Beneficiaries, and a Life Insurance Company under the Life Insurance Act with obligations to Policyholders.

4. Our Ethical Framework

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 and our community
- I follow through, I know what is expected of me and I am accountable

Transparent

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

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

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

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 policies and expectations?
- Does this feel right?
- Am I harming anyone?
- Would my colleagues, our customers, our stakeholders say I am acting fairly and ethically?
- Will this be a positive outcome for ClearView, its customers and the community in the longer term?

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

5. Our Code's Application

Our Code applies to everyone in the ClearView Group. Following Our Code is mandatory and is a key aspect of our contract with you. 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.

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 business engagement with us.

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

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.

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.

The ClearView Board and Senior Management Team will support Our Code by:

- Leading by example in everything they do;
- Providing mandatory training and education in Our Values, Our Code and Our Risk Culture and Responsibilities (at least annually);
- Making appropriate certifications of compliance with the Code and other relevant policies annually, or as often as required;
- Keeping Our Values, Our Code and Our Risk Culture and Responsibilities front of mind through regular communications and linkages to performance reviews, recognition and rewards and a pre-requisite for promotion; and
- Ensuring the Board and Senior Management Team has adequate reporting of our heroes and role models, but also any breaches and their resolutions.

7. Speaking Up

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.

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.

If you have any questions or concerns raise them with your manager or a member of the Senior Management Team.

If your concerns involve your Manager, we encourage you to refer the matter to a member of the Senior Management Team or a member of Human Resources team.

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.

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

Our Code and Our Values 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 decisions of our people, Senior Management 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.

Where there is ambiguity, ClearView will firstly ask “Should we?” and then “Can we?”

Risk culture at ClearView is comprised of the following key elements:

- A defined and supported ClearView risk appetite and strategy
- 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
- Aligned performance management and incentives
- Culture of decision-making and, where necessary, to challenge and escalate

9. ClearView policies

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 and procedures.

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.

Our Customer Policies

Our customers deserve and have our focus. When we make decisions affecting our customers please be aware of and follow the key Policies to ensure we deliver the right outcomes.

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

Policies:

- Product Development & Oversight Committee Charter
- Privacy Policy
- Complaints Handling Policy
- Information Security Policy
- Vulnerable Customers policy

Our People Policies

Our people are truly our best asset and they are what differentiates ClearView. Our people are critical in achieving outcomes for our customers ensuring that they 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.

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 understand their personal obligations to prevent damage to themselves and ClearView or its stakeholders including their management, and where necessary, mitigation of any conflicts of interest

Policies:

- Diversity and Inclusion Policy
- Conflicts of Interest and Related Party Transactions Policy
- Gift 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

Our Community

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. When we make decisions that affect our community please follow the key Policies to ensure we achieve the right outcomes.

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 including Risk Appetite and Risk Culture.

Policies:

- Securities Trading Policy
- Anti-Money Laundering /Counter Terrorism Financing Program
- Risk Management Framework including the Risk Management Strategy, Risk Appetite Statement and Risk Culture Framework.
- Media and Communications Policy
- Corporate Governance Statement
- Modern Slavery Statement
- ESG Investment Policy

10. Additional Expectations of our Leaders

Our Board, Senior Management Team and our Managers throughout ClearView uphold and help us to uphold the highest standards that we at ClearView expect and help us consistently live our values and shape our culture.

If you head 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 or Responsible Person.
- **Set expectations**, for your team and staff on the outcomes being sought, the behaviour 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 teams champion and living the spirit of the intent through their actions and decisions.
- **Uphold Our Code**, into operational and people management processes, rewards, recognition and sanctions you use within your teams. Keeping the importance of Our Code current and alive by constant reference and practical application is key to it being instilled 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 Risk Appetite and Risk Management Strategy and regularly discuss their impact on their work and outcomes. Foster constructive relations between your team and ClearView risk, audit and compliance teams.

- **Encouraging speaking up** by ensuring staff are encouraged and comfortable in challenging outcomes, including detecting, escalating, and remediating issues your team are responsible for.

11. Publication and review of Code of Conduct

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

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

It was last approved on 22 June 2021.