



Australian Government

Commonwealth Superannuation Corporation

CSC Code of Conduct

Effective Date: November 2025



**Commonwealth
Superannuation
Corporation**

1. What is the purpose of the CSC Code of Conduct?

The CSC Code of Conduct sets out the standards of behaviour expected of all CSC employees, including permanent full-time, part-time, fixed term, casual staff, contractors, interns, volunteers, consultants, directors, or any other individuals which CSC may engage to undertake work.

2. What is expected of me under the CSC Code of Conduct?

You are expected to observe the highest standards of ethics, integrity and behaviour while you are employed by or engaged with CSC. This Code provides an overview of CSC's business values. It summarises some of CSC's most important policies based on standards that underlie business ethics and professional integrity - standards that apply to you.

You must always maintain professionalism and courtesy, both while at work and when representing CSC outside the workplace, by adhering to the Code of Conduct through:

1. Acting with honesty and integrity;
2. Treating everyone with respect and courtesy;
3. Complying with all Australian laws;
4. Upholding CSC's Values and Behavioural Expectations;
5. Acting consistently with CSC's Conflicts Management Policy and Framework;
6. Not making external public comment in relation to the activities of CSC without authority.

3. How do I as a 'CSC employee' create a best practice workplace?

CSC recognises the importance of a work environment that actively promotes best practice. This Code describes the expected standards of behaviour and conduct expected from you in your dealings with customers, suppliers, clients, co-workers, management and the general public.

When using CSC's ICT systems, you must adhere to the Acceptable Use of ICT Policy and the ICT Security Policy. These policies set out how to use CSC systems responsibly, the expected level of conduct, including protecting against risks such as malware and avoiding the mishandling of sensitive information. They explain your responsibilities when accessing ICT services, handling CSC data, and ensuring content is appropriate. The policies also cover matters such as personal use, monitoring, and storage of information. By following them, you help maintain the confidentiality, integrity, and security of CSC's systems and information.

See: CSC Acceptable Use of ICT Policy and CSC ICT Security Policy.

4. What does adherence to the Code require me to do and no do?

(Code of Conduct standards of behaviour: 1, 2, 3, 4)

We want CSC to be a great place to work and that means ensuring all our team feel valued, respected and supported. CSC provides fair and favourable working conditions that respect the dignity and human rights of everyone, including colleagues, visitors and customers.

Unacceptable conduct includes:

- Doing anything that might offend or embarrass a reasonable person;
- Doing anything that might appear to be improper or biased;
- Engaging in bullying, harassment, discrimination, sexual harassment, or victimisation.
- Using illegal drugs, or inappropriate use of alcohol or other substances, in the workplace or at work events in contravention of the CSC Drugs & Alcohol Policy;
- Being a witness/bystander and failing to report inappropriate actions or behaviours in a timely manner.

Acceptable conduct includes ensuring you:

- Respect everyone's health, safety and well-being;
- Take action by reporting hazards, unsafe work practices or instances of inappropriate workplace conduct early to help prevent harm and maintain a safe, respectful workplace.
- Act fairly and professionally with everyone at work;
- Act with propriety, integrity, courtesy and sensitivity and demonstrate these qualities in relation to any advice or service you give;
- Maintain the knowledge and skills you need to be able to capably perform in your role;
- Behave in a responsible, respectful and professional manner and in accordance with our Values and behavioural expectations;
- Act in the best financial interests of CSC's customers, performing your duties diligently, fairly, and responsively;
- Advise your manager if you are charged with a criminal offence.

See: CSC Work Health and Safety Policy, CSC Appropriate Workplace Behaviour Policy, CSC Incident reporting procedure and CSC Drugs & Alcohol Policy and Policy – User Guide.

4.1. How do I avoid a conflict of interest?

(Code of Conduct standards of behaviour: 1, 3, 4, 5)

CSC expects you to perform your duties conscientiously, honestly and in accordance with the best interests of CSC's customers. You must not use your position or knowledge gained as a result of your position in CSC for private or personal advantage.

You must take suitable measures to avoid, or appropriately deal with, any situation in which you may have, or be seen to have, a conflict of interest. You need to comply with CSC's Conflicts Management Policy, which sets out how to deal with any actual, potential or perceived conflicts of interest, including but not limited to:

- Accepting any favours, hospitality or gifts; or
- Undertaking any outside employment.

See: CSC's Conflicts Management Policy and CSC's Conflicts Management Framework.

4.2. When is it OK to make a public comment?

(Code of Conduct standards of behaviour: 6)

What is public comment? Public comment includes any written or electronic comment including through social media, public speaking engagements, comments on radio or television and expressing views in newspapers, to journalists, or in books, journals or notices where the publication or circulation of the comment might be accessed by the community.

Commenting as a member of the community: As a member of the community, you have the right to make public comment in a private capacity and enter into public debate on political and social issues. However, employees should consider very carefully whether they can be identified as a CSC employee when commenting as a member of the community, including as a CSC customer, taking into account the likelihood of being perceived to be representing the views of CSC.

Commenting as a representative of CSC: Only authorised representatives of CSC may make public comments about the activities or views of CSC.

See: CSC's Public Comment Policy

4.3. How do I protect the privacy of information received?

(Code of Conduct standards of behaviour: 1, 3, 4)

CSC is responsible for the privacy, confidentiality and security of personal information it receives. Personal information is protected and must be kept confidential in accordance with federal legislation, including the Privacy Act 1988 and the Australian Privacy Principles under that Act.

When you access CSC data or information, whether it relates to CSC customers or staff, you must maintain the integrity, confidentiality and privacy of that information, and only access information on a 'need to know' basis.

CSC's practices for collecting, holding, using and disclosing personal information are set out in the CSC Privacy Policy and Privacy Notice.

4.4. Protecting your and others health and safety at work

(Code of Conduct standards of behaviour: 2, 3, 4)

Under the WHS Act 2011, you must:

- take reasonable care for your own physical and psychological health and safety, take reasonable care that your acts or omissions neglect do not adversely affect the health or safety of anyone else;
- understand incident reporting processes and report any hazards or work practices you feel may be unsafe, if it looks wrong or unsafe, report it;

- comply with any reasonable instruction, policy or procedure relating to health and safety; and
- work with management to identify safety problems and find solutions.

Employees holding management positions (regardless of the level) also have increased levels of responsibility as referred to in the CSC WHS Policy (Officers and Managers).

See: CSC Work Health and Safety policy.

4.5. How do I act with professional integrity?

(Code of Conduct standards of behaviour: 1, 2, 3, 4)

When you are representing CSC, you must act according to the highest ethical and professional standards by:

- Conducting all business dealings and relationships with integrity;
- Respecting everyone you do business with;
- Basing all relationships with customers, colleagues, suppliers, employees and third parties on fair dealing; and
- Complying with this Code of Conduct and other applicable CSC policies.

4.6. How do I ensure that I am abiding by the law?

(Code of Conduct standards of behaviour: 1, 2, 3, 4, 5)

You must comply with all applicable Australian laws, regulations, and CSC's policies and procedures. This section explains the expectations around compliance, how to address uncertainties, and the steps to take if there is any conflict between external requirements and CSC's internal standards.

Consequences of non-compliance: If you fail to comply with laws and regulations, both CSC and you individually may face criminal sanctions or other serious consequences. You must also comply with CSC's internal policies and procedures, including this Code.

Ascertaining what applies: If you are unsure what laws, policies, procedures or practices apply to your work, talk to your manager or team leader, People Business Partner or Risk Champion, or review policy documents and training materials (available in ELMO).

Maintaining awareness: Complete all required training and education programs to build and maintain your awareness and knowledge of relevant laws, policies, procedures and practices.

Dealing with inconsistencies: If there is any inconsistency between the laws and regulations applying to your work and CSC's policies and procedures, you must comply with the law. If you believe such an inconsistency exists, talk to your manager, team leader or People Business Partner.

4.7. How do I adhere to the Whistleblower Protection and Public Interest Disclosure Policy?

(Code of Conduct standards of behaviour: 1, 2, 3, 4, 6)

A culture of early prevention and detection of issues encourages information to be brought to light so that it can be addressed and rectified. Whistleblowing helps uncover misconduct that may not otherwise be detected and is to be disclosed and managed in accordance with the CSC Whistleblower Protection and Public Interest Disclosure Policy. There are whistleblower protections available for individuals who report under this policy.

See: CSC Whistleblower Protection and Public Interest Disclosure Policy.

4.8. How do I adhere to the dress code?

(Code of Conduct standards of behaviour: 1, 2, 3, 4)

Your appearance reflects both you and CSC. At CSC employees work across office (face to face), hybrid, and remote settings - the Dress Policy sets out the standards expected in each environment. You must adhere to the policy, and your clothing should support a professional and safe workplace.

See: CSC Dress Policy.

5. What happens if I breach the Code of Conduct?

Consequences of breaching the Code: As a CSC employee, failing to adhere to the Code of Conduct may lead to you facing disciplinary action, which may include but is not limited to, counselling, a formal warning or termination of your employment.

Standards for handling potential breaches: In handling a misconduct matter, managers and staff must:

- Act consistently with the principles of fairness and equity;
- Focus on the facts of the matter as established by due process;
- Promptly and efficiently investigate the matter with necessary formality, ensuring it is considered fairly and in line with the CSC Appropriate Workplace Behaviour policy;
- Not pre-judge the outcome before all information has been reviewed.

Process for handling complaints and/or potential breaches of the Code:

The Chief People Officer will determine whether it is appropriate to undertake a formal investigation process, which may involve appointing an external investigator. This is outlined further in CSC's Acceptable Workplace Behaviour policy. The person suspected / alleged in the complaint/potential breach of the Code will be provided with an opportunity to respond to the alleged breach(es) and to provide any information which will assist the investigation.

An investigation into an alleged breach of the Code may include, but is not limited to:

- Interviews conducted by the investigator with the complainant, other witnesses, and the subject of the complaint/potential breach.
- A review and assessment of data and information relevant to the investigation, for example hours worked and relevant IT records;
- A discussion regarding the circumstances surrounding the alleged breach.
- De-identified disclosure of complaints to CSC’s Board of Directors.

Any staff member who is the subject of an investigation may be directed to cease performing their duties, on full pay, where this is considered necessary to preserve the integrity of the investigation or to reduce potential risks to business operations or the health, safety and wellbeing of staff. Additionally, they will be offered the option of attending formal interviews with a support person of their choice. The role of the support person is to provide personal support to the staff member but not speak on their behalf.

See: CSC Appropriate Workplace Behaviour Policy.

Criminal offences: Matters clearly constituting a criminal offence are referred to the police. This does not preclude us continuing a misconduct investigation under the Code of Conduct, taking care not to interfere with any police matter.

6. Related policies/documents/legislation

- CSC Appropriate Workplace Behaviour Policy
- CSC Values and Behavioural Expectations Guide
- CSC Work Health & Safety Policy
- CSC Drugs & Alcohol Policy
- CSC Privacy Policy and Privacy Notice
- CSC Conflicts Management Policy and Framework
- CSC Privacy Policy
- Public Comment Policy
- CSC Dress Policy
- CSC Acceptable Use of ICT Policy

7. Review

This policy will be reviewed by the People Team every 3 years or following a trigger event, in particular in the light of relevant regulatory changes or any significant changes to CSC’s business operations or environment, to assess its continuing currency. Updates and changes will be approved by the CSC Board.

Date	Author	Version	Comments
18 January 2017	People Team	1.0	General update
1 September 2017	People Team	2.0	General update

29 June 2018	People Team	2.1	Title change as per new org structure
11 April 2022	People Team	2.2	General update – updated CSC values, reflect the importance of sexual harassment and updates to policy references and position descriptions.
11 November 2022	People Team	3.0	General update - Whistleblower Protection and Public Interest Disclosure Policy and Remuneration and HR Committee approval
6 November 2025	People Team	4.0	General update - Inclusion of contractors and non-CSC employees, added relevant IT policies, refined language, and expanded and updated sections to reflect current practice.