



**Australian Government**

**Commonwealth Superannuation Corporation**

# CSC – Code of Conduct



Effective Date: 1 July 2022



**Commonwealth  
Superannuation  
Corporation**

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

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The CSC Code of Conduct sets out the standards of behaviour expected of you as a CSC employee.

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

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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.

Both inside the workplace and outside where you can be perceived as representing CSC, you must be professional and courteous behaviour and must reflect the Code by:

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 create a best practice workplace?

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

## 4. What does adherence to the Code require me to do, or not do?

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(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.

### What you must not do

You must not:

- Do anything that might offend or embarrass a reasonable person;
- Do anything that might appear to be improper or biased;
- Use illegal drugs or engage in inappropriate use of alcohol or other substances in the workplace.

### What you must do

To keep our workplace free from discrimination, harassment, sexual harassment, bullying and victimisation, you must:

- Respect everyone’s health, safety and wellbeing;
- 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;
- Act in line with CSC Values, reflecting customer drive, united, accountable and future focused service to customers and their employers;
- Act in the best interest and best financial interest of CSC’s customers, performing your duties diligently, fairly, and responsibly; advise your manager if you are charged with a criminal offence.

#### 4.1 How do I avoid a conflict of interest?

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(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 or potential conflicts of interest, including:

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

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

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

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(Code of Conduct standards of behaviour: 6)

**What is public comment?** Public comment includes any written or electronic comment including through social medial, 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.

**Commenting as a representative of CSC:** Only authorised representatives of CSC may make public comments about the activities or views of CSC. CSC’s Media Contact Policy and CSC’s Social Media Policy set out the procedures for making public comment. You must comply with those policies.

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

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(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 have access to CSC information, you must maintain the integrity, confidentiality and privacy of that information.

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

### 4.4 How do I protect workplace health & safety?

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

You must maintain a safe workplace for yourself, colleagues and visitors at all times. You must observe health and safety obligations and co-operate with all CSC's procedures for protecting work health and safety.

See:

- CSC Work Health Safety Policy and Guidelines.

### 4.5 How do I act with professional integrity?

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(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;
- Complying with this Code of Conduct and other applicable CSC policies.

### 4.6 How do I abide by the law?

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

**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 Advisor or Risk Champion, or review policy documents and training materials (available in ELMO).

**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 or team leader.

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

## 4.7 How do I adhere to the dress code?

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

What you wear should reflect a professional and safe workplace environment.

You must:

- Observe CSC's Dress Policy;
- Make sure that your identification badges or security passes are visible.

See: CSC Dress Policy.

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

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**Consequences of breaching the Code:** If you don't adhere to the Code of Conduct, you may face disciplinary action, which may include but not be limited to, counselling, a reprimand or termination of your employment.

**Standards for handling 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;
- Investigate with as little formality and as much haste as possible to consider the matter properly;
- Not pre-judge the outcome.

The subject of the complaint 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 not be limited to:

- Interviews conducted by the investigator with the complainant, other witnesses, and the subject of the complaint;
- 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.

Any staff member who is the subject of an investigation 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 the Appropriate Workplace Behaviour Policy.

**Criminal offences:** Matters clearly constituting a criminal offence are immediately 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

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- CSC Appropriate Workplace Behaviour Policy
- CSC Values and Behavioural Expectations Guide
- CSC Work Health & Safety Policy
- CSC Conflicts Management Policy and Framework
- CSC Privacy Policy and Privacy Notice
- CSC Media Contact Policy
- CSC Social Media Policy
- CSC Dress Policy

## 7. Review

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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. Any changes will be approved by the Executive Manager, People.

Date	Author	Comments
18 January 2017	People Team	General update
1 September 2017	People Team	General update
29 June 2018	People Team	Title change as per new org structure
11 April 2022	People Team	General update – updated CSC values, reflect the importance of sexual harassment and updates to policy references and position descriptions.