

CODE OF CONDUCT

The Code of Conduct applies to all people employed by Insurance Australia Group (the Group).

The Code is designed to make employees aware of their responsibility to perform their duties in an ethical and appropriate manner to ensure that IAG maintains its reputation as a good corporate citizen.

ENSURING INTEGRITY

It is important to maintain the Group's reputation for honesty and integrity. You should therefore be open and honest in all your dealings with the Group as an employee and customer.

DISHONEST AND FRAUDULENT BEHAVIOUR

You must immediately report any possible fraudulent activity including theft of company property, breach of any legal, regulatory or organisational requirement, or inappropriate practices or behaviour which affects the Group, to your manager, Human Resources Manager, or the Corporate Investigations Unit. For more information refer to the *Dishonest or Fraudulent Behaviour policy*.

Audits are regularly conducted to ensure the integrity and security of our people, systems and processes. You must fully cooperate with any audit or investigation where required.

Serious disciplinary action, including termination of employment, will be taken against any employee who is involved in theft, fraud or other dishonest behaviour.

CONFLICTS OF INTEREST

Situations where your personal or professional interests conflict with your obligations to the Group should be avoided. For example, if your position brings you into business contact with your personal interests, or those of family or friends, inform your manager immediately.

EMPLOYMENT OUTSIDE THE GROUP

Employment undertaken outside work hours is permitted, unless that employment causes a conflict of interest. For example, work done for a competitor could produce a

conflict of interest. Speak to your manager if you are unclear about when a conflict of interest may exist.

Use of the Group's equipment, information or property is prohibited for work done outside of the Group.

STAFF BUSINESS

Under no circumstances should you handle or process any form of IAG business such as insurance claims, amend or create policies, authorise payments or change personal details for yourself, family, friends or associates.

PURCHASE OF GOODS AND SERVICES

The purchase of goods and services from a trade contact or supplier, or the purchase of salvage or property associated with a claim, is permitted but must be arranged with your manager.

A fair price should be paid for any goods or services purchased to ensure that you are not placed in a position where you may be 'indebted' to the trade contact or supplier.

GIFTS AND BENEFITS

Great care should be taken when accepting gifts or benefits as they may create a sense of obligation to the donor. Any gift, favour or other benefit must be declared.

You and your manager will need to decide whether to return the gift or benefit, donate it to charity, or share it between employees.

Always act in an ethical manner and under no circumstances should you offer or accept any improper payments or bribes.

Seek approval from your manager prior to accepting invitations to trade nights or social events related to your position within the Group.

COMPLIANCE WITH LEGAL AND REGULATORY REQUIREMENTS

IAG is required to comply with a number of laws, regulations, industry codes and organisational policies and practices that regulate the conduct of the Group's

businesses. To ensure that the Group meets its obligations, all employees must be aware of these compliance obligations in the conduct of their duties.

DEALING IN INSURANCE AUSTRALIA GROUP LIMITED (IAG) SHARES

Insider trading in IAG shares is illegal and can result in substantial penalties, including jail terms. Such illegal conduct will lead to disciplinary action and may lead to termination of employment. Managers and nominated employees may only buy or sell IAG shares during three dealing window periods during the year. For further details, please refer to the *Protocol for Dealing in IAG Shares*.

CONFIDENTIALITY

Information concerning the Group and its customers is confidential and must not be released without authorisation from your manager. Information gained through your customer dealings should only be used in the course of your employment.

PRIVACY ACT OBLIGATIONS

Compliance with the Privacy Act by all employees is mandatory. All employees have an obligation and personal responsibility to respect our customers', and all individuals', right to privacy. This means doing everything reasonably within your power to protect the security of any personal information you handle in the course of doing your job. For more information, speak to your manager or refer to the Privacy section on *insideIAG!*

PROTECTING CONFIDENTIAL INFORMATION

- Commercially sensitive documents, records and files should be stored securely and not left where visible.
- Confidential information should not be left on computer screens and you must not share your computer access passwords with others.
- Computer systems should be secured and used for business purposes only. This ensures long term integrity of systems and confidentiality of business, customer and employee data.

- Employees must not misuse email or internet systems and should refer to the *Email and Internet Access Policy* which outlines appropriate use.

For more information, employees should refer to the *Physical Security Policy & Protocols on insideIAG!* which covers in more detail the physical security requirements of IAG.

This includes building access and ensuring employees maintain a 'clean desk policy'.

COMMUNICATION WITH THE MEDIA

Media or public comment on the Group can only be made by IAG employees authorised to do so. Corporate Affairs should be advised as soon as any media enquiries are received. If you have any doubt about who is authorised to speak to the media, contact Corporate Affairs.

Refer all investor relations enquiries, for example questions about the performance of IAG shares, to Investor Relations.

CONFIDENTIALITY AFTER CEASING EMPLOYMENT

The confidentiality agreement signed at the beginning of your employment with IAG legally obliges you to keep any information acquired during your employment confidential, even after your employment ceases. You cannot pass on information about the Group's business, customers, suppliers or staff.

EEO AND ANTI-HARASSMENT

The Group is committed to equal employment opportunities for all employees. All employees will be treated fairly and no person will be discriminated against on the basis of race, colour, sex, sexual preference, age, physical or mental disability, marital status, family responsibilities, pregnancy, religion, political opinion, national extraction or social origin.

The Group will not tolerate any form of sexual harassment. Sexual harassment is any form of unwelcome and uninvited words, or conduct, of a sexual nature that a reasonable person would find offensive, humiliating, intimidating or embarrassing.

OCCUPATIONAL HEALTH AND SAFETY

IAG is committed to ensuring the health, safety and welfare of all employees, customers and contractors as detailed in the *Occupational Health and Safety Policy*. The Group adopts a cooperative approach between managers and employees in the development and implementation of occupational health and safety practices.

DRUGS AND ALCOHOL

The use of drugs and alcohol may impair an employee's capacity to perform their job safely, efficiently and with respect for work colleagues and customers.

No employee is to commence work, or return to work whilst under the influence of alcohol or drugs. Employees found under the influence of drugs or alcohol, or in possession of illegal drugs whilst at work will be subject to disciplinary action and in some cases, their employment may be terminated.

IAG provides the services of an Employee Assistance Program to assist employees in the treatment of alcohol or drug use problems.

YOUR RESPONSIBILITIES

It is the responsibility of all employees to ensure that they work in a manner consistent with this Code.

Further information on matters covered in this Code can be obtained through your manager, HR manager, HR policies on *insideIAG!* and from operating procedures and manuals.

If you are unsure about any aspects of this Code please speak to your manager.



Mike Hawker
Chief Executive Officer
Insurance Australia Group



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