

Challenger Human Rights statement



Our commitment to Human Rights

Challenger is focused on providing customers with financial security for retirement. We do this by offering investment strategies that exhibit consistently superior performance, and by helping customers in retirement with safe and reliable income streams.

To make this happen, we work collaboratively with people inside and outside of Challenger and ask, "should we?", not just "can we?".

At Challenger we respect and support internationally recognised human rights as set out in the Universal Declaration of Human Rights and the Fundamental Conventions of the International Labour Organisation¹. We expect employees (including executives, non-executive directors and contractors) of Challenger and its related entities to comply with this statement and we seek to work with third parties who support our approach and standards.

¹ These conventions address: freedom of association; collective bargaining; forced labour; minimum age; worst forms of child labour; equal remuneration; and discrimination.

Challenger's Human Rights statement is based on the following principles:



We respect and support internationally recognised human rights;



We comply with human rights laws in countries where we operate;



We understand that reducing inequalities will drive positive change for the majority; and



We believe in collaborative action to drive change.

Our focus

At Challenger, while we recognise the broad range of internationally recognised human rights, we focus on our salient human rights issues and the people who could be adversely impacted.

We aim to address these issues within our operations and sphere of influence through our focus on:

1. Providing a fair, safe and healthy work environment

Challenger is committed to providing a fair, safe and healthy work environment for our employees that is free from unlawful discrimination, harassment and bullying and where individuals are treated with respect.

2. Sound labour practices

At Challenger, we do not tolerate or support the use of child labour, forced or compulsory labour, or any form of slavery or slavery-like practices in our operations or our supply chain. We support a living wage and comply

with local laws on working hours, including overtime and encourage our employees to take leave throughout the year.

3. Freedom of association

Challenger respects and supports the rights of employees to establish, join or not join trade unions or other associations, and we recognise any local rights to collective bargaining.

4. Providing a diverse and inclusive workforce

Challenger encourages a diverse and inclusive workforce where people can succeed regardless of their gender, age, ethnicity, cultural background, sexual orientation, disability and religious belief.

5. Respecting people's privacy

At Challenger, we respect the privacy of our customers and our employees and take appropriate steps to protect their personal information.



Respecting and promoting Human Rights

Wherever Challenger operates, we will comply with local laws and regulations, and cooperate with the relevant authorities in respecting and promoting internationally recognised human rights.

At Challenger, we respect and promote human rights through our corporate policies, programs and initiatives, and broader governance and stakeholder management methods. These are communicated to our global operations and, where relevant, are available to reference on our corporate intranet.

Corporate policies and provisions that reflect and support our commitment to respecting and promoting human rights include:

- Corporate Code of Conduct
- Conflicts of Interest Policy
- Domestic Violence Policy
- Diversity Policy
- Fraud and Corruption Policy
- Privacy Policy
- Discrimination and Harassment Policy
- Workplace Bullying Policy
- Work Health and Safety Policy
- Whistleblower Policy

We believe all people are entitled to basic rights and freedoms. In line with the Modern Slavery Act 2018 (Cth), we are undertaking focused work to evolve and expand relevant policies and processes to include our focus on human rights. This work and progress to date is communicated through our [Modern Slavery Statement](#).

At Challenger, we are committed to responsible supply chain management and consider social, environmental and human rights-related factors in procurement decisions. When considering suppliers, we show preference to those that operate in a manner which is consistent with our values and standards. We expect our suppliers to comply with Australian state and federal legislation (including labour laws, anti-corruption laws, environmental regulations and workplace health and safety standards).



Review, monitoring and compliance

This statement has been endorsed by the Board and will be reviewed at least every two years, or as required if there are material changes in either the regulatory framework or business activities.

As part of our monitoring and compliance processes, Challenger has a Whistleblower Policy and encourages disclosures from employees, former employees and suppliers regarding any unethical, illegal, corrupt or other inappropriate conduct, including behaviour which is inconsistent with this statement. The Whistleblower Policy (which covers details on how to report and the end-to-end investigation process) is available on Connect and challenger.com.au.

This statement will evolve over time in response to business and operational developments, input from stakeholders, changes in law and regulation, risk assessments and due diligence. We will also continue to develop and align our existing policies and processes to ensure consistent implementation of human rights in our business practices.