

# SUPPLIER CODE OF PRACTICE

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# SUPPLIER CODE OF PRACTICE

ANZ's purpose is to shape a world where people and communities thrive. That means striving to create a balanced, sustainable society in which everyone can take part and build a better life.

Our suppliers are important partners in helping ANZ bring our purpose to life.

As a signatory to the UN Global Compact and a supporter of the OECD Guidelines for Multinational Enterprises, ANZ embraces a fair, sustainable, responsible and ethical approach to procuring and delivering goods and services. ANZ expects that its suppliers and all third parties subcontracted to our suppliers in the provision of goods and services to or on behalf of ANZ, conduct themselves in accordance with the set of principles in this code covering:



**HUMAN RIGHTS  
AND WORKPLACE  
RELATIONS**



**INFORMATION  
MANAGEMENT &  
CONFIDENTIALITY**



**OCCUPATIONAL  
HEALTH & SAFETY**



**ACCESSIBILITY**



**ETHICAL BUSINESS  
PRACTICES**



**SUPPLIER DIVERSITY**



**ENVIRONMENTAL  
MANAGEMENT**



To give effect to our purpose, the UN Global Compact and the OECD Guidelines for Multinational Enterprises, we commit to:

- Working collaboratively with our suppliers to encourage their support for and understanding of our approach, and consistent adherence to these principles
- Continuing to embed these principles into our business practices including through training, communications, contracts, agreements, and due diligence processes.

## ANZ'S COMMITMENT

We use our best endeavours to ensure that suppliers of goods and services to our businesses comply with this code. We reserve the right to verify compliance with this code and expect our suppliers to cooperate and provide supporting evidence as we may reasonably require. This may involve self-assessment by suppliers, requests for further information, site visits or audits by us or our agents. We proactively manage the implementation of this code through:

- Analysing risk, opportunities and impacts of the code on our supply chain
- Undertaking ongoing training and awareness programs to ensure all of our employees are aware of the code and its implications for our suppliers
- Engaging with, and communicating the requirements of this code and related policies to our suppliers on an ongoing basis
- Implementing an assurance program to review supplier compliance with this code
- Reporting our progress, including to ANZ's Ethics and Responsible Business Committee
- Exercising our rights under our agreements with suppliers, including by terminating agreements where that is appropriate.

## OUR SUPPLIERS' COMMITMENT

We expect our suppliers to share our commitment to adopting a fair, safe, responsible and ethical approach to business.

Our suppliers, whether directly or through their supply chain, are therefore required to comply with all applicable laws and in all cases to adhere to the following principles detailed in this code as a condition of doing business with ANZ.

We expect our suppliers to provide influence and guidance within their own supply chain and related third parties to adopt a fair, safe and ethical approach to business, and to demonstrate compliance with this code.

Our suppliers must monitor their compliance, notify us of any breaches and take reasonable steps to address, remedy and prevent repetition of any breach of this code.

## HUMAN RIGHTS & WORKPLACE RELATIONS

### HUMAN RIGHTS:

- Comply with all applicable human rights related laws in respect of their employees and business operations
- Conduct their business activities in a manner which respects human rights as set out in the UN Universal Declaration of Human Rights and the core conventions of the International Labour Organisation.

### WAGES, BENEFITS & CONDITIONS:

- Compensate employees in compliance with all applicable domestic wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits
- Convey all relevant employment conditions clearly to employees
- Restrict working hours to be within legally accepted maximums including overtime and ensure employees are afforded at least one day off per seven-day week
- Ensure any disciplinary wage deductions are in compliance with domestic laws.

### FORCED LABOUR & INHUMANE TREATMENT OF WORKERS:

- Not tolerate or support the use of forced trafficked or compulsory labour and extend this approach through all areas of their supply chain
- Not engage in, or condone, the use of corporal punishments or mentally, physically or sexually abusive or inhumane treatment of workers.

### CHILD LABOUR:

- Abide by all key international standards and domestic regulations relating to the employment of children and maintain a clear policy stating the company's position in relation to child labour
- Not engage in practices relating to or subcontracting to organisations who employ child labour at any stage of the manufacturing or service delivery process
- Ensure workers under the age of 18 do not perform hazardous work or work that is detrimental to their physical or mental well-being as well as being restricted from night or unsupervised work.

## GENDER BALANCE, DIVERSITY AND INCLUSION:

- Be committed to a workforce free of harassment and unlawful discrimination and to ensure this commitment extends to all aspects of workplace relations
- Provide a workplace that is free of direct and indirect discrimination, harassment and bullying & ensure this commitment extends to all aspects of workplace relations
- Promote an inclusive and respectful workplace whereby race, religion, age, sexual orientation, gender, pregnancy, maternity and/or disability are no impediment to recruitment and/or ongoing employment
- Foster gender balance and greater diversity in the workforce, leadership pipeline and senior executive ranks while ensuring that recruitment and advancement is based wholly on merit
- Be committed to identifying and removing gender pay gaps that may exist in the workforce.

## FREEDOM OF ASSOCIATION & COLLECTIVE BARGAINING:

- Encourage open communication and direct engagement between workers and management to resolve workplace issues without fear of reprisal, intimidation or harassment
- Respect the rights of workers to establish, join or not join trade unions and any other association of their choice and support the right of representative unions and staff to bargain collectively.

## EMPLOYEE DEVELOPMENT & TRAINING:

- Provide employees with the appropriate level of training to perform their normal employable duties to completion and necessary to comply with the principles outlined in this code
- Be considerate to employee needs for leave and flexible work arrangements where an education or training course directly relates to normal or agreed future duties
- Support the use of legitimate workplace apprenticeship programs, which comply with all relevant laws and regulations.

## OCCUPATIONAL HEALTH & SAFETY

- Comply with all relevant Health & Safety legislative requirements
- Provide a safe environment for employees, visitors and third parties, by managing risk and employing safe systems of work and appropriate training for employees and contractors in safe work practices for the type of work being performed
- Implement and maintain health and safety practices that demonstrate compliance with the principles of management responsibility required by work health and safety legislation
- Upon request, provide ANZ with evidence of compliance with health and safety practices.

## ETHICAL BUSINESS PRACTICES

### IMPROPER ADVANTAGE:

- Act in an ethical, fair and professional manner in all discussions and negotiations with ANZ and its associated agencies, consultants and contractors
- Conduct themselves in an ethical and fair manner, free from bias, unfair advantage, or any other behaviour which may cause ANZ financial loss or damage to reputation
- Not engage in fraud, bribery or corrupt conduct
- Comply with all local and national regulatory requirements with regard to bribery, corruption and prohibited business practices.

### GIFTS AND ENTERTAINMENT:

- Not offer nor receive gifts or entertainment nor sponsored travel that could improperly influence, or be perceived to improperly influence, the outcome of business transactions or be perceived to secure any improper advantage of any kind.

### TRADE SANCTIONS:

- In all dealings with ANZ, not engage directly or indirectly in trade activities or include in the supply chain any goods or services sourced from sanctioned persons, countries or organisations; in accordance with all sanctions laws with which ANZ must comply, including local or regional sanctions as mandated by the Government for the relevant jurisdiction applicable to ANZ.

### TREATMENT OF SUPPLIERS:

- Act in an ethical, fair and professional manner in all dealings with their supply chain, including adhering to timely payments and not enforcing unfair contract terms on suppliers.

### IMPACT ON COMMUNITIES:

- Ensure that supply chain activities do not adversely impact local communities, including human rights and land rights, relating to the communities which they operate in or are located in, with specific consideration to Indigenous communities.

## ENVIRONMENTAL MANAGEMENT

- Implement and maintain an environmental management system and/or processes appropriate to their business to support compliance with local government regulations and environmentally responsible business best practices
- Embed environmental management principles within business operations and processes and deploy measures to prevent and reduce harm to the environment
- Measure carbon emissions associated with products and services provided to their customers and develop strategies to minimise the environmental impact of these life-cycle emissions
- Reduce operational environmental impacts such as electricity and gas consumption, travel emissions, water consumption, management of hazardous materials, and waste and recycling production, especially greenhouse gas emissions
- Maintain environmental objectives and environmental targets which at a minimum include commitments to identify, measure and reduce significant environmental impacts and identify business risks associated with climate change.

## INFORMATION MANAGEMENT & CONFIDENTIALITY

Maintaining the confidentiality and integrity of information that is shared with our suppliers is critically important to ANZ regardless of the form in which it is shared.

- ANZ expects our suppliers to protect the information that ANZ or our customers may share with them and to handle such information in accordance with applicable legal and regulatory requirements
- Implement appropriate measures to protect this information against loss, unauthorised access and unauthorised use (e.g. physical loss, privacy breach, cyber incident etc.). Suppliers must notify ANZ as soon as possible upon becoming aware of any such loss, unauthorised access or unauthorised use
- In addition, ANZ's and our customers' information is to be treated as confidential information and must only be used:
  - (i) for the purposes of providing services to ANZ;
  - (ii) in accordance with applicable contract terms; and
  - (iii) in accordance with applicable legal and regulatory requirements.

## ACCESSIBILITY

- Support ANZ in its commitment to embedding accessibility and Principles of Universal Design across all aspects of its business, so that ANZ can deliver inclusive products, services, environments and experiences to its customers, employees and the community, including people with disability
- Ensure that all products and services supplied to ANZ comply with accessibility standards and guidelines
- Include and learn from a diverse range of people, including people with disability, in the design, development, testing and innovation of products and services.

## SUPPLIER DIVERSITY

One way that we all can make a difference to the communities in which we operate is to strive to create a balanced, sustainable economy in which everyone can take a part. ANZ seeks to engage suppliers who have diverse ownership, such as Indigenous owned businesses (eg as part of our approach to Reconciliation in Australia) as well as disability enterprises & social enterprises amongst others, through our direct and indirect supply chain.

We expect our suppliers to work with us to identify and implement appropriate opportunities across our supply chain to engage diverse businesses in the delivery of goods and services to ANZ. Although we do not mandate this within our supply chain, we look to actively encourage it.

## RAISING CONCERNS & WHISTLEBLOWING

ANZ expects its suppliers to help our business succeed and to promote our values and high professional standards, including our commitment to do the right thing by our customers, regulators, shareholders and the community. To help meet this expectation, ANZ is committed to fostering an environment where our suppliers and sub-contractors can raise concerns about any actual or suspected breach of this code or actual or suspected misconduct within or by ANZ, or the ANZ Group and anyone at or connected with the ANZ Group.

Suppliers, their employees and sub-contractors can raise concerns with:

- Their supplier relationship point of contact, or
- Via email to [GroupProcurement@anz.com](mailto:GroupProcurement@anz.com)

Alternatively, in the event that a supplier, contractor, subcontractor or an employee or family member does not feel comfortable doing this, they can report actual or suspected misconduct within or by ANZ, or the ANZ Group and anyone at or connected with the ANZ Group under ANZ's Whistleblower Policy (available on [anz.com](http://anz.com)).

The Whistleblower Policy sets out how reports can be made under the policy, including to an independent third party via ANZ's External Whistleblower reporting service managed by Deloitte. The Policy also sets out the protections that apply to reporters.

Website: [www.anz.deloitte.com.au](http://www.anz.deloitte.com.au)

Mail: ANZ Whistleblower Service, Reply Paid 12628, A'Beckett St, Victoria, Australia 8006

Phone

- Australia: 1800 997 448 (Toll Free)
- New Zealand: 0800 376 325 (Toll Free)
- Other International: +61 3 9667 3731

QR code (you will need a QR reader which you can download online)



## FURTHER INFORMATION:

We are interested in your questions and feedback and invite you to contact us, by email, at [GroupProcurement@anz.com](mailto:GroupProcurement@anz.com).

For historic versions of ANZ's Supplier Code of Practice which you believe may have applied to you, please contact us, by email, at [GroupProcurement@anz.com](mailto:GroupProcurement@anz.com).

## DOCUMENT ADMINISTRATION - ANZ SUPPLIER CODE OF PRACTICE

Document Level	Public
Version No.	V4.0
Document Owner	Manager, Group Procurement Policy & Governance
Document Administrator	Sustainability & Governance Manager, Group Procurement
Related documents	A list of relevant ANZ Policies and related documents can be found at: <a href="https://www.anz.com/shareholder/centre/about/corporate-governance/">https://www.anz.com/shareholder/centre/about/corporate-governance/</a>
Date of publication / effective date	June 2020
Date of last review	December 2016
Regulator (if applicable)	Self-Regulated
Compliance mechanism	Regular review of supplier agreements and audit of selected suppliers
Review and Approval Body	Group General Manager, Group Property and Chief Procurement Officer

