



# Supplier Code of Conduct



# Supplier Code of Conduct

**At the Commonwealth Bank of Australia Group, our purpose is to improve the financial wellbeing of our customers and communities. To achieve this, we recognise we have a responsibility to work in a collaborative manner with our suppliers to manage environmental and social risks, and to proactively identify opportunities for diverse and traditionally underserved communities.**

The intent of this Code is to share the Group's principles and clearly communicate the behaviour and business practices we expect our suppliers to adhere to – including throughout the Suppliers own supply chains – in providing goods and services to the Group. These behaviours and practices include meeting social and environmental standards as well as satisfying governance and compliance obligations. By suppliers, we mean any organisation that provides goods or services to the Group, including their sub-contractors.

Suppliers, their supply chain and subcontractors must review and ensure compliance with this Code.

## Our Commitments and Principles

The Group delivers balanced and sustainable outcomes for stakeholders by conducting our business in a responsible way and by making meaningful contributions to the communities in which we operate.

We require the highest ethical practices and professional standards from our employees through their commitment to:

- Ensuring our behaviours, decisions and actions are aligned to the Group's Code of Conduct and Values Expectations (including a "Should We" test);
- Compliance with laws and regulations;
- Integrating environmental and social risk management into business practices and procedures;
- Valuing and respecting all people by protecting human rights, and leveraging diverse backgrounds, experiences and perspectives;
- Acting responsibly and with integrity to mitigate risk and safeguard the Group, employees, customers, brand, reputation, assets and information;
- Ensuring that our Suppliers are made aware of and adhere to this Code.

The Group is a signatory to the UN Global Compact, Task Force on Climate-related Financial Disclosures, RE100, Australian Supplier Payment Code, UN Women Empowerment Principles, Business Council of Australia's Raising the Bar Program, Australian Banking Association Code of Practice, and Australian Banking Association Accessibility Principles for Banking Services.

We require that our suppliers and subcontractors, and the suppliers within their supply chain, share our values and adhere to these same principles which underpin the Code.

We are careful to balance transparency with stakeholder confidentiality. We report on our actions and our suppliers' adherence to this Code through our Annual Report, Modern Slavery Statement, the CDP (formerly Carbon Disclosure Project) and related indices and benchmarks.

# Social

The Group constantly strives to understand and improve community and human rights impacts throughout our broader value chain and not purely where we have operational control.

## Human Rights And Labour Practices

Respect for human rights underpins the way we do business. Our approach to human rights is aligned to and guided by the International Bill of Human Rights, the International Labour Organisation Declaration on Fundamental Principles and Rights at Work and the United Nations Guiding Principles on Business and Human Rights.

The Group requires that our suppliers will:

- Be aware that human rights are universal and fundamental rights that preserve the inherent freedom, dignity and equality of all human beings;
- Comply with international human rights laws and norms set out in the International Bill of Human Rights and the International Labour Organisation Declaration on Fundamental Principles and Rights at Work.
- Manage their operations and their own supply chain and subcontractors guided by the United Nations Guiding Principles on Business and Human Rights;
- Ensure there is no forced or bonded labour, and suppliers may not use, or in any way benefit from or contribute to any type of modern slavery;
- Not use child labour that deprives children of their childhood, their potential and their dignity, and that is harmful to their physical or mental development including by interfering with their education.
- Allow freedom of association and collective bargaining for workers, allowing them to join or form trade unions of their own choosing and to bargain collectively;
- Commit to a workplace free from workplace bullying, harassment, victimisation, and abuse, unlawful or inhumane treatment.
- Provide fair pay and working conditions for employees, including meeting minimum wage requirements, and without unauthorised or disciplinary measure deductions.
- Allow workers to leave their employment after reasonable notice; ensure workers are not charged recruitment fees, or require workers to lodge deposits or identity papers.
- Provide all workers with a written and comprehensible contract outlining their wage conditions and method of payments before entering employment.
- Provide fair working hours, leave, adequate rest periods, and benefits required by law. Regular working hours should not exceed 48 hours and overtime should be voluntary and not excessive.

## Work Health And Safety (WHS)

The Group is committed to ensuring the health and safety of our people, customers, contractors, visitors and suppliers.

The Group requires that our suppliers will:

- Comply with all legal responsibilities under applicable legislation of the country in which they operate;
- Provide a safe and hygienic working environment through proactive management and controls that minimise health and safety risks, support accident prevention, with appropriate training to perform their jobs safely.

## Diversity And Inclusion

The Group's diversity and inclusion commitments aim to foster a culture of inclusion which respects and meets the diverse needs of all of our people, customers and communities.

The Group requires that our suppliers will:

- Have in place EEO, anti-discrimination and anti-harassment policies covering your operations and supply chain which meet or exceed requirements of any relevant laws;
- Ensure products and services comply with relevant laws, industry standards and codes of practice;

- Ensure workforce processes, practices and decisions are fair and merit-based, particularly in regards to recruitment, promotion evaluation of performance and remuneration;
- Be committed to establishing a culture of respect and inclusion in the workplace, with the Group and customers and communities in which they operate;
- Be committed to identifying and eliminating gender pay gaps that may exist in the organisation;
- Make provision for parental and carers leave for all employees as required by law;
- Promote the principles of diversity and inclusion through their supply chain.

We may invite our suppliers to participate in diversity and inclusion training as appropriate.

## **Accessibility**

The Group is committed to embedding relevant accessibility standards and inclusive design principles to deliver accessible products and services for all of our people, customers and communities.

The Group requires that our suppliers will:

- Make reasonable adjustments to meet all relevant discrimination law, standards and codes;
- Follow the Principles of Universal Design to ensure accessibility of all products and services provided;
- Ensure appropriate consultation and usability testing is conducted with employees and customers with a range of disabilities, people with diverse perspectives and lived experiences and different locations.

## **Indigenous Rights**

The Group is committed to advancing the rights of Indigenous People's in every jurisdiction in which we operate.

The Group requires that our suppliers will:

- Respect, protect and promote the rights of Indigenous peoples;
- Recognise the right to free, prior and informed consent (FPIC) for Indigenous peoples affected by their supply chain decisions;
- Ensure their operations or supply chain activities do not result in the forced removal of Indigenous peoples or other marginalised populations from their lands, territories and waters.

# **Supplier Diversity**

The Group is committed to ensuring our supply chain reflects the communities in which we operate. Particularly, we are committed to achieving parity in Indigenous procurement.

We proactively seek to engage and support Indigenous, women-owned businesses, disability enterprises and social enterprises through our direct and indirect supply chain. Diverse suppliers are those that are over 50% diverse owned and controlled or are certified with a relevant not-for-profit organisation.

We expects our suppliers will work with us to identify and pursue subcontracted opportunities for diverse-owned suppliers across our supply chain.

# Environment

The Group is proactive in measuring and reducing its environmental footprint and in playing its part in limiting climate change in line with the goals of the Paris Agreement and supporting the responsible global transition to net zero emissions. We aim to procure goods and services that have the least possible negative environmental impact.

The Group requires that our suppliers will:

- Meet all relevant local and national environmental protection laws, regulations and standards as well as strive to comply with international environmental protection standards;
- Assess and manage the environmental impact across their operations, transport and supply chain and take responsibility for minimising the negative impact of their goods and services throughout their lifecycle;
- Minimise pollution, use of toxic and persistent chemicals, and promote an efficient and sustainable use of resources, including energy and water;
- Minimise greenhouse gas emissions;
- Protect biodiversity, and ensure timber is not sourced from illegal logging or old growth forests;
- Have suitable sustainable certification related to the primary materials in their product (e.g. sustainable forestry certification for paper products).

# Transparency, Compliance And Governance

The Group is committed to assessing and managing risks, and ensuring its supply chain is transparent, resilient and free from bribery and corruption.

The Group requires that our suppliers will:

- Comply with all relevant laws, regulations and standards regarding all goods and services they provide to the Group;
- Ensure zero tolerance and implement procedures to mitigate corruption in any form, including bribery, extortion, kickbacks, facilitation payments and improper private or professional benefits to customers, agents, contractors, suppliers or employees of any such party or government officials;
- Act in a fair, reasonable and ethical manner, where your dealings with existing and prospective customers and guarantors of the Group extends to banks' products and services, marketing and sales practices;
- Proactively bring anything of concern to the Group's notice in a timely manner. Breach of relevant laws and regulations must be reported to the Group;
- Have an appropriately documented and tested Business Continuity Plan (BCP) in place in the event of a crisis (e.g. fire, flood) to maintain key business operations;
- Have an appropriately documented and tested cyber security incident and breach management plan that meets Group regulatory reporting obligations in the case of an incident (e.g. data loss, privacy breach, cyber incident).

## Raising a Concern

The Group requires that our suppliers will:

- Have a grievance mechanism or whistleblower policy or process that is clearly communicated and understood by employees and suppliers, protecting whistleblowers and prohibiting retaliation or victimisation by their employer, the Group, or the Group's employees.
- Suppliers have access to Commonwealth Bank Group's SpeakUp service, a trusted avenue available 24/7 to raise matters or conduct of concern of relevance to the Group:

**Phone:** 1800 773 258, or reverse charge from overseas on +61 2 9151 9156 (in English)

**Email:** [speakup@speakuphotline.com.au](mailto:speakup@speakuphotline.com.au)

**Online:** [cba.whispli.com/speakuonline](http://cba.whispli.com/speakuonline)

**Options:** You have the option of identifying yourself or remaining anonymous.

# How The Group Works With Suppliers

We strive to build long-term relationships with suppliers by working in an open and honest manner and with a goal of improving environmental and social practices across our supply chain.

## Management Systems

Our suppliers should have systems that support the implementation of this Code, or an equivalent standard, appropriate to the size and nature of their organisation, and appropriate to the nature of the services they provide to Group.

The Group requires that our suppliers will:

- Communicate the principles of this Code to relevant management, employees, supply chain and subcontractors;
- Proactively identify, manage, monitor, and remediate any adverse impacts on society and the environment where their business is involved, in line with relevant laws and regulations and this Code;
- Keep adequate records to substantiate compliance with this Code and relevant laws and regulations;
- Obtain our consent prior to outsourcing service, production or parts of production to a subcontractor;
- Be able to give an account of where goods ordered by the Group are produced.

## Assessment And Improvement

We have a responsibility to conduct due diligence before entering relationships with suppliers, including having new suppliers complete an environmental and social risk assessment, address any improvement opportunities, and agree to this Code. The Group reserves the right to carry out regular assessments of our suppliers, such as through self-assessment questionnaires, requests for additional information or site visits.

The Group requires that suppliers to the Group will:

- Respond in full and be open and honest in response to any requests for information;
- Self-monitor their compliance with this Code and to inform us of any non-compliance;
- Agree and complete an improvement plan to address any breaches or shortcomings to the Code.

We are aware that some suppliers will not meet all of our requirements all of the time. In this case, we focus on building our suppliers' understanding so they can implement the most suitable measures independently. If a supplier is unable or unwilling to meet our minimum standards, we may choose to end the relationship at our discretion subject to contractual obligations.

We are committed to supporting our suppliers in their endeavours to raise their performance in relation to environmental and social matters and associated risk management.

Please contact [responsiblesourcing@cba.com.au](mailto:responsiblesourcing@cba.com.au) with any questions or feedback.

