SUPPLIER CODE OF CONDUCT

At the Commonwealth Bank Group, we are determined to build sustainable practices into every aspect of our business and we recognise the importance of managing our supply chain.

Our purpose is to improve the financial wellbeing of our customers and communities.

For our supply chain, this means supporting us in our commitment to providing products and services for our organisation, the community and the economy which demonstrate value for money and minimise environmental impacts.

Our Corporate Responsibility approach is aligned to the increased expectation of corporations acting as ‘good citizens’ from the perspective of customers, shareholders and the broader community. The Corporate Responsibility Strategy is the Group’s roadmap to secure and enhance the wellbeing of the communities in which we operate, through the way we do business and our role in society.

The intent of this Code is to share our principles and clearly communicate the Group’s expectations of our suppliers – including throughout their own supply chains – in providing products and services to us. By suppliers, we mean any organisation that provides products or services to the Group.

Our suppliers must review this Code and ensure that their organisations and their extended supply chain comply.

COMMITMENT AND PRINCIPLES
The Group expects the highest ethical practices and professional standards from its employees through their commitment to the following business practices and principles:

• Compliance with laws and regulations;
• Socially responsible and sustainable practices;
• Valuing and respecting all people by leveraging diverse backgrounds, experiences and perspectives;
• Robust corporate governance;
• Displaying integrity with a proactive focus on risk awareness and management;
• Environmental stewardship by mitigating environmental impacts; and
• Acting responsibly to mitigate risk and safeguard the Group, employees, customers, brand, reputation, assets and information.

We expect that our suppliers, and their supply chain, share our values and adhere to these same principles which underpin the Code.
**SOCIAL**

Some key impacts a supplier may have on the social systems in which they operate include, but are not limited to, human rights and labour, health and safety, community, equal employment opportunities and diversity, anti-discrimination and supplier diversity.

**Human Rights**

We expect that suppliers to the Group 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 guided by the United Nations Guiding Principles on Business and Human Rights.
- Ensure compliance with relevant laws affecting forced or involuntary labour, child labour, discrimination and security practices.
- Ensure that company products, services or facilities are not used for human trafficking and/or labour or sexual exploitation.
- Not use forced, bonded or involuntary labour so that, for example, workers are free to leave after their shift ends, or to resign their employment after giving reasonable notice.
- Allow freedom of association and collective bargaining for workers to join or form trade unions of their own choosing and to bargain collectively.

**Labour Practices**

We expect that suppliers to the Group will:

- Provide fair pay and working conditions for employees, including meeting minimum wage requirements and compensation.
- Provide fair working hours, leave, adequate rest periods, and legally mandated benefits relevant to the country in which they operate.
- Make provision for parental and carers leave as required by law.

**Work Health and Safety (WHS)**

The Group is committed to ensuring the health and safety of our people, customers, contractors and visitors. This may include the provision of safe operating procedures, installation and maintenance manuals, registration, licensing or competency requirements and material safety data sheets.

We expect that suppliers to the Group will:

- Comply with all legal responsibilities under applicable legislation of the country in which they operate.
- Provide workers with a safe and clean working environment meeting the legal requirements of the country in which they operate, with appropriate training to perform their jobs safely.

**Community**

The Group has been an essential part of the growth of Australian communities for more than 100 years and is proud to contribute to the communities we live and work in. We have created enduring partnerships with some of Australia’s leading community organisations covering some of the most important social issues including the environment, health, sport and the arts. The Group seeks to engage suppliers who also look to make a positive contribution to local communities.

**Diversity, Equal Employment Opportunity (EEO) and Anti-Discrimination**

The Group’s diversity and inclusion strategy values and respects all people, leveraging diverse backgrounds, experiences and perspectives.

We expect that suppliers to the Group will:

- Have EEO, anti-discrimination and anti-harassment policies in place which meet or exceed requirements of any relevant laws where the product is made or service delivered.
- Ensure hiring practices are based on an individual’s ability to do the job and are not based on personal characteristics including, but not limited to gender, ethnic origin, age, religious beliefs or practices, family responsibilities / parental status / marital status, pregnancy, disability, sexual orientation / identity and physical appearance.
- Be committed to establishing a culture of respect and inclusion through valuing and respecting differences in their staff.
- The Group may invite our suppliers to participate in diversity and inclusion training as appropriate.

**Supplier Diversity**

The Group is committed to developing a supplier list which reflects our diverse customer base and offers a wide range of perspectives and capabilities. The suppliers we seek to engage as part of our supplier diversity strategy, include Indigenous-owned businesses, women-owned or led businesses, disability enterprises and social enterprises.

We proactively identify opportunities in our supply chain, through our Supply Nation membership and Reconciliation Action Plan commitments.

The Group actively strives to increase leadership opportunities for women through the Male Champions
of Change initiative and as a signatory to the UN Women’s Empowerment Principles. This includes engaging directly with women-owned or led businesses as well as supporting suppliers with strong gender balance policies and demonstrated performance improvement.

All of our supplier relationships must provide value to us and be based on merit. We encourage our suppliers to mirror this commitment to supplier diversity in their own supply chains.

**TRANSPARENCY AND GOVERNANCE**

The Group uses a risk assessment framework to assess financial and operational risk exposure. To assess our supply chain risk exposure, we consider a supplier’s location, manufacture process and product life cycle as well as their responses to our Sustainability Questionnaire.

We expect that suppliers to the Group will:

- Comply with all local and national laws and regulations pertinent to their operations regarding all products and services they provide to the Group. This also extends to their own supply chain.
- Understand regulatory and compliance obligations applicable to the product or service.
- Implement procedures for their employees to comply with applicable anti-bribery and corruption laws.
- Protect privacy of information and comply with applicable privacy laws as well as secure Group data against unauthorised access or use.
- Actively manage performance and risk and proactively bring anything of concern to the Group’s notice in a timely manner.
- Co-operate fully with the Group or its nominated auditor by providing reasonable access to its premises, its staff and relevant documentation, as required.
- Have a whistleblower policy or process that is clearly communicated and understood by employees, protecting employee whistleblowers and prohibiting retaliation or victimisation. For the Commonwealth Bank Group’s SpeakUP service dial 1800 773 258, or reverse charge from overseas on +61 2 9151 9156. Alternatively you can email speakup@speakuphotline.com.au. There are options available for reporting via the SpeakUP service, including identifying yourself, remaining anonymous, or as a whistleblower under the Commonwealth Bank Group’s Whistleblower Policy, which suppliers and its employees have access to.
- Have a documented and tested Business Continuity Plan (BCP) in place in the event of a crisis (e.g. fire, flood) to maintain key business operations.

**ENVIRONMENTAL**

The Group is proactive in measuring and reducing its environmental footprint, with the aim of procuring products and services that have the least possible negative environmental impact.

We expect that suppliers to the Group will:

- Meet all relevant local and national environmental protection laws, regulations and standards as well as strive to comply with international environmental protection standards.
- Actively manage the environmental impact of their operations, and take responsibility for minimising the negative impact of their products and services throughout their lifecycle.
- Establish environmental targets and report regularly in the public domain on progress towards these.
- Have an Environmental Management System (EMS) aligned to ISO 14001, or plan, to identify and manage environmental risks (such as energy usage, water usage, waste and emissions).
- Have suitable sustainable certification related to the primary materials in their product (e.g. sustainable forestry certification for paper products).
- Have reporting capability on energy consumption and greenhouse gas emissions.

**SUPPLY CHAIN MANAGEMENT**

The Group has a responsibility to shareholders to ensure its entire supply chain adheres to its principles. We are committed to helping our suppliers comply with the Code and in turn, expect our suppliers to require their own suppliers to comply with the Code.

We expect that suppliers to the Group will:

- Communicate this Code to their own organisation as well as their supply chain, so that all are aware of, and comply with this Code.
- Proactively work with their own suppliers to ensure the principles within this Code are met.
- Demonstrate a willingness and commitment to comply with this Code of Conduct.

**ASSESSMENT**

We reserve the right to carry out regular assessments of the practices of our suppliers to ensure alignment with this Code. This may include self-assessment by suppliers, or a request for additional information, or site visits. We also reserve the right to audit our suppliers.

We expect that suppliers to the Group will:

- Respond in full and be open and honest in response to any requests for information.
- Complete an agreed corrective action plan until a satisfactory level of improvement is reached should any breaches or shortcomings regarding the Code be identified.
We are interested in your feedback on our Supplier Code of Conduct and welcome you to contact us:

EMAIL
Email us at: procurementops@cba.com.au

MORE
For more information on the Group’s Corporate Responsibility Strategy, go to: commbank.com.au/about-us/who-we-are/opportunity-initiatives