

SUPPLIER CODE OF PRACTICE

16 December, 2016

SUPPLIER CODE OF PRACTICE

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SUPPLIER CODE OF PRACTICE

ANZ is a signatory to the UN Global Compact, and 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:



**GOVERNANCE AND
GENERAL COMPLIANCE**



**HUMAN RIGHTS AND
WORKPLACE RELATIONS**



**OCCUPATIONAL
HEALTH & SAFETY**



**ETHICAL BUSINESS
PRACTICES**



**ENVIRONMENTAL
MANAGEMENT**

In alignment to our corporate values and as a signatory to the UN Global Compact and supporter of the OECD Guidelines for Multinational Enterprises, we commit to:

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

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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 this code on our supply chain
- Undertaking ongoing training and awareness programs to ensure all of our employees are aware of this 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
- Amendment of this code from time to time to reflect changes in regulatory and legislative requirements as well as relevant best practice
- Reporting our progress, including to ANZ's Corporate Sustainability and Diversity 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 AND 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 Organization

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 and 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:

- Not engage in practices relating to or subcontracting to organisations who employ child labour at any stage of the manufacturing or service delivery process
- 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 this
- Ensure workers under the age of 18 do not perform hazardous work and are 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 and 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

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

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OCCUPATIONAL HEALTH & SAFETY

- Comply with all applicable H&S 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 its 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 or receive gifts or entertainment or sponsored travel that could affect, or be perceived to affect, the outcome of business transactions or are not otherwise reasonable and justified

Use of Association:

- Not publicly disclose their supply association with ANZ in any form without express written permission from an authorized ANZ representative
- Not use any ANZ image or brand elements without the express written permission from an authorized ANZ representative and then strictly in accordance with any conditions specified by ANZ

Association and Disclosure:

- Not associate with criminal organizations or criminal activity, whether implied or specific
- Not disclose or release any ANZ proprietary information to any third party, particularly where that information may provide an actual or perceived competitive advantage or market knowledge

Trade Sanctions:

- Not engage in trade activities or include in the supply chain any goods or services sourced from sanctioned persons, countries or organisations in accordance with current UN Security Council sanctions, US Sanctions and any local or regional sanctions as mandated by the Government for the relevant jurisdiction

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 practices
- Embed environmental management principles within business operations and processes
- Seek ways to maximize the efficient use of energy, water, resources and raw materials and minimize waste and pollution, especially greenhouse gas emissions

RAISING A CONCERN (WHISTLEBLOWING)

ANZ expects its suppliers to help our business succeed and to promote our values and high professional standards. 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.

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

- Their supplier relationship point of contact, or
- Via email to GroupProcurement@anz.com, or
- In the event that an employee or contractor does not feel comfortable doing this, a disclosure may be made to an independent third party via ANZ's External Whistleblower reporting service managed by Deloitte.
- Website: www.anz.deloitte.com.au
Username: ANZ
Password: whistleblower
- Email: anz@deloitte.com.au
- Mail: ANZ Whistleblower Service, Reply Paid 12628, A'Beckett St, Victoria, Australia 8006
- Fax: + 61 3 9667 8181
- Phone
Australia: 1800 997 448 (Toll Free)
New Zealand: 0800 376 325 (Toll Free)
Other International: +61 3 9667 3731
- QR Code (requires a downloaded QR Reader)



FURTHER INFORMATION:

We are interested in your questions and feedback and invite you to contact us, by email, at 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.

DOCUMENT ADMINISTRATION – ANZ SUPPLIER CODE OF PRACTICE

Document Level	Public
Version No.	V3.0
Document Owner	Group Procurement, Chief Procurement Officer
Document Administrator	Manager, Group Procurement Policy & Governance
Related documents	A list of relevant ANZ Policies and related documents can be found at: https://www.anz.com/about-us/corporate-sustainability/governance-risk/standards-policies/
Date of publication / effective date	December 2016
Date of last review	January 2014
Regulator (if applicable)	Self-Regulated
Compliance mechanism	Regular review of supplier agreements and audit of selected suppliers
Review and Approvals	Group General Manager, Enterprise Services