

## About Suncorp

Suncorp Group Limited is a leading financial services provider in Australia and New Zealand, enabling more than nine million customers to better protect and enhance their financial wellbeing. With a heritage dating back to 1902, we have grown to become a top-20 ASX-listed company with over 13,000 people and \$96 billion in assets. We offer banking, wealth management and insurance products and services through our well-recognised brands including Suncorp, AAMI, GIO, Apia, Shannons and Vero, as well as those from our partners.

## Procurement and Outsourcing at Suncorp

Suncorp procures significant quantities of a diverse range of goods and services and we ensure strong governance of procurement activities to ensure our supply chain is cost effective, innovative, risk managed, sustainable, responsible, fair and ethical. This includes actively managing environmental, social and governance risks and opportunities in our supply chain.

This Supplier Code of Practice details Suncorp's approach to Corporate Governance and Corporate Responsibility and the standards expected of our suppliers, and their supply chains, when providing goods and services to or on behalf of Suncorp. This document is intended to be read in conjunction with the binding contractual terms and conditions that Suncorp has with its suppliers, and provides additional information about what we expect of any third party providing products or services to or on behalf of Suncorp.

## Corporate Responsibility

Creating and preserving value for Suncorp's stakeholders is fundamental to our approach to Corporate Responsibility. We continually strive to improve our business practices to optimise outcomes, earn trust and maintain our social licence to operate.

Our Corporate Responsibility Principles and Framework helps us to achieve Suncorp's purpose to create a better today for all stakeholders. Through our Corporate Responsibility Principles and Framework, we will actively manage the environmental, social and governance risks and opportunities we face as we conduct business. More information can be found at: <http://www.suncorpgroup.com.au/about-us/responsibility>

Suncorp is committed to these Corporate Responsibility Principles:



### TRUST AND TRANSPARENCY

We are committed to building trust and doing the right thing. We are open and transparent in our dealings with our stakeholders.



### RESPONSIBLE FINANCIAL SERVICES

We put our customers at the heart of everything we do and help them make good choices. We provide customers with access to affordable financial services that meet their needs.



### SUSTAINABLE GROWTH

We seek to innovate and optimise economic, social and environmental outcomes throughout our business and value chain.



### RESILIENT PEOPLE AND COMMUNITIES

We respect human rights and invest in the wellbeing and resilience of our people and communities. We are there for our people and our communities in times of need.

## Corporate Governance and Ethical Business Practices

Suncorp's Board believes the highest standards of corporate governance are essential for sustaining long-term company performance and creating value for its shareholders and key stakeholders. The Board is committed to maintaining a robust governance system and promoting a culture that values responsible, ethical behaviour and integrity. We expect our suppliers to share these values. Suncorp's Code of Conduct and Whistleblower Policy apply to our suppliers and we make these available to suppliers.

Suppliers are expected to:

- Comply with all local and national laws and regulations including bribery, corruption, money laundering and prohibited business practices.
- Comply with Australian sanction laws, UN Security Council sanction regimes and any local or regional sanctions, and preclude from the supply chain any goods or services sources from sanctioned persons, countries or organisations.
- Comply with Suncorp's Code of Conduct.
- Comply with Suncorp's Whistleblower Policy.
- Conduct business in an ethical, fair and professional manner which includes not offering or receiving 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.
- Not publicly disclose their supply association with Suncorp in any form without express written permission from an authorised Suncorp representative.
- Be able to measure, manage and report on social, environmental and governance performance.
- Promote timely and balanced disclosure of material matters concerning the goods or services provided by the supplier to Suncorp.
- Adhere to acceptable business practices with their own suppliers, including providing for timely payment and reasonable contractual conditions, and avoid all unfair business practices.

## Human Rights and Workplace Conditions

Human rights are universal and fundamental rights that preserve the inherent freedom, dignity and equality of all human beings. Suncorp respects human rights and invests in the wellbeing and resilience of our people and communities.

Suppliers to the Suncorp Group are expected to:

- Comply with human rights and fair employment practices in accordance with the International Bill of Human Rights.
- Comply with all relevant local and national laws and regulations in relation to employment practices, health and safety, human rights, discrimination, harassment and bullying.
- Provide a safe and healthy workplace for all employees.
- Provide fair working conditions for their employees, including acceptable maximum working hours, adequate rest periods, and sufficient leave.
- Pay their workers minimum or living wages, including equal pay for equal work, and consider acceptable living conditions.
- Support the right to freedom of association and collective bargaining, and avoids corporal punishment or unfair disciplinary practices.
- Promote diversity, inclusion and equity in the workplace where race, religion, age, sexual orientation, gender, pregnancy, maternity, and/or disability are no impediment to recruitment and/or ongoing employment.
- Ensure that no forced labour, child labour or involuntary labour is used.
- Comply with any due diligence, remediation and reporting requirements that result from the Australian Modern Slavery Act.
- Provide employees with the appropriate level of awareness and training to perform their role and to comply with this Code of Practice.

## Safety and Wellbeing

The safety and wellbeing of our people is a critical focus for Suncorp as we strive for a workplace free from preventable injury or illness. Suncorp is committed to workplace safety and wellbeing and aims to create a safe environment for all people who work with Suncorp.

Suppliers are expected to:

- Be compliant with all relevant national and local safety legislation, including but not limited to workplace and operational health and safety, including health and safety management and reporting.
- Have a written health and safety policy or equivalent document, and ensure that employees are trained to comply with that policy.
- Have a system to record, monitor and manage health and safety risks and incidents, that is aligned to the organisation's risk profile as well as applicable laws and standards.
- Comply with Suncorp Safety and Wellbeing Policy, and all Suncorp site-specific safety requirements.

## Community Investment

Suncorp is committed to building the social and financial resilience of our people and the communities we are part of. For more than 100 years we have been investing in the community and addressing some of the most important social issues through employee giving, community partnerships, commercial initiatives and charitable donations. Suncorp seeks to engage suppliers who also look to make a positive contribution to their local communities.

## Supplier Diversity

At Suncorp, we promote and celebrate our differences, valuing and respecting the diversity of thought, lifestyle, experience and background that makes us who we are. We seek to reflect and be a part of the communities in which we operate and live. Suncorp will proactively identify opportunities in our supply chain to meet commitments under our Financial Inclusion Action Plan, Reconciliation Action Plan and Climate Change Action Plan. We encourage opportunity for a diverse range of suppliers which may include but is not limited to;

- Majority Indigenous owned businesses and those who employ Indigenous people.
- Businesses that achieve gender balance and gender pay equity including in senior leadership and Board positions.
- Other businesses that achieve employee, leadership and ownership diversity in culture, age and ability.
- Social Enterprises.
- Locally owned small businesses.

We acknowledge that for a large organisation like Suncorp it may not be practical to directly contract with a large number of diverse suppliers, as such our focus is on integrating suppliers into our supply chain where it makes best sense. We actively engage with suppliers to facilitate introduction between Tier 1 and Tier 2 suppliers. Suncorp seeks to engage suppliers who proactively ensure a diverse range of suppliers within their supply chain.

## Impact on Environment

To create sustainable value, we adapt our business to evolving market conditions. Suncorp takes a long-term view, makes balanced business decisions and actively responds to changing economic, social and environmental conditions. We manage our own economic, social and environmental impacts to ensure the sustainable growth of both our business and the communities in which we operate. Suncorp seeks to engage suppliers who look to proactively reduce their greenhouse gas emissions, and build resilience to climate related physical and transitional risks to their business and their communities.

Suppliers are expected to:

- Comply with all relevant local and national laws and regulations relating to environmental impact, climate change and greenhouse gas emissions.
- Conduct their business operations in a way that protects and sustains the environment.
- Where applicable, have an environmental management plan which takes responsibility for goods and services throughout their lifecycle and minimises the impact on the environment, and ensure that employees are trained to comply with that plan.
- Cooperate with Suncorp on measurement and reporting of greenhouse gas emissions in the supply chain.

## Product Safety

As an essential services provider, Suncorp has a responsibility to provide access to affordable financial services that meet the needs of customers. Suncorp complies with Australian Consumer Law.

Suppliers are expected to:

- Ensure all products and services are safe and meet local and national mandatory standards.
- Comply with all consumer laws and regulations and avoid all unfair business practices.
- Comply with all product recalls, bans and mandatory reporting.

## Data Protection and Privacy

Data security is integrated into all aspects of Suncorp's business to ensure an appropriate balance between value and risk to Suncorp and our customers. Suncorp is committed to protecting the privacy of our customer's personal information and preventing financial crime. Suncorp's Privacy Policy, that sets out how Suncorp manages and secures the personal information it holds, applies to our suppliers and we make this available to suppliers.

Suppliers are expected to, where applicable:

- Comply with the requirements of the Suncorp Privacy Policy.
- Comply with other related security policies and standards when notified and provided by Suncorp.

## Business Resilience

Business resilience principles are embedded through Suncorp's Business Continuity Management (BCM) program. This program enables us to identify, plan and respond to continuously evolving disruptive risks, incidents and challenges. The BCM program is reviewed, tested and validated on a yearly basis. All staff are provided training and take part in awareness activities.

Suppliers are expected to, where applicable:

- Have a business continuity plan (BCP) to minimise business impacts in the event of major disruption including an emergency response plan to minimise harm to employees, the local community and environment in the event of a site disaster.
- Have an escalation process within the BCP to communicate with Suncorp in the event that the regular operations are disrupted that could impact supply to Suncorp.
- Review and test BCPs every twelve months.
- Have a risk management framework which incorporates social, environmental and governance risks into their risk management processes.

## Responsible Value Chain

Suncorp is committed to assessing the environmental, social and governance risks and opportunities in our banking and insurance portfolios, and in our supply chain and procurement practices. The business practice and performance of our suppliers can have a direct impact on the sustainability of our business, including the Suncorp brand and reputation.

Suppliers are expected to:

- Ensure that this Code of Practice is communicated to all their sub-contractors, in a manner that can be understood.
- Ensure adequate governance processes and controls are in place over their own supply chain to assess, select and execute supplier arrangements that meet this Code.

## Assessment and Review

Suncorp will work with suppliers to ensure alignment to this Code of Practice. Suncorp may at their discretion conduct regular assessments of the practices of its suppliers to ensure alignment with this Code of Practice and polices references within this document. This may incorporate screening, self-assessments, direct engagement with suppliers, requests for supporting documents and data and ongoing management and mitigation of material risks. This process is intended to assist with identifying best practices and support a sustainable and responsible supply chain.

Suppliers are expected to:

- Disclose breaches to the Code of Practice to Suncorp within 48 hours.
- Respond to requests for review and or documentation in a timely manner.
- Provide transparent, correct and complete information.
- Support Suncorp during on-site visits.

## Raising Concerns

Suncorp is committed to fostering a culture of honest and ethical behaviour. Suncorp recognises the importance of ensuring a safe, supportive and confidential environment where people feel confident about reporting wrongdoing and are supported and protected throughout the process.

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

- Their supplier relationship points of contact, or
- Via email to [procurement@suncorp.com.au](mailto:procurement@suncorp.com.au) 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 Suncorp's External Whistleblower Reporting Service

The Suncorp Whistleblower Service contact details are below.

### Phone

Australia: 1800 444 774  
New Zealand: 0800 425 047  
International: +61 3 9667 3727  
(international call rates apply)

### Mail

Australia: Reply Paid 12628 A'Beckett  
Street, Melbourne, VIC 8006  
New Zealand: PO BOX 912028 Victoria  
Street West, Auckland 1142 New  
Zealand

### Web

[www.suncorp.deloittedigital.com](http://www.suncorp.deloittedigital.com)

### Email

[suncorp@deloittedigital.com](mailto:suncorp@deloittedigital.com)

### Fax

+613 9691 8182