

## Supplier Code of Conduct

## **Table of Contents**

1.0 Supplier Code of Conduct	2
1.1 Introduction and Great Southern Bank's Commitment	2
1.1.1 The Code's purpose is to:	2
2.0 Principles and Expectations	3
2.1 Corporate Governance and Ethical Business Practices	3
2.1.1 Suppliers must:	3
2.1.2 Suppliers are encouraged to:	4
2.2 Risk Management and Sustainability	5
2.2.1 Suppliers must:	5
2.2.2 Suppliers are encouraged to:	5
2.3 Health, Safety and Wellbeing	5
2.3.1 Suppliers must:	6
2.3.2 Suppliers are encouraged to:	6
2.4 Human Rights	6
2.4.1 Suppliers must:	6
2.5 Inclusion and Diversity	7
2.5.1 Suppliers must:	7
2.5.2 Suppliers are encouraged to:	7
2.6 Environmental Management	7
2.6.1 Suppliers must:	8
2.6.2 Suppliers are encouraged to:	8
2.7 Information Management and Confidentiality	8
2.7.1 Suppliers must:	8
3.0 Implementation and Due Diligence	. 10
4.0 Speaking Up	.11



## 1.0 Supplier Code of Conduct

#### 1.1 Introduction and Great Southern Bank's Commitment

We acknowledge the Traditional Custodians of the lands on which we operate, and pay our respects to Elders past, present, and to emerging community leaders. We also acknowledge the important role Aboriginal and Torres Strait Islander peoples continue to play within the communities in which Great Southern Bank operates and where our team members reside.

As a responsible business, we are committed to procuring goods and services from suppliers that share our values. We expect our suppliers to uphold the highest standards of ethics and compliance in their business practices and to treat their employees with dignity and respect. We hold our suppliers accountable to these standards through our Supplier Code of Conduct ("the Code"), which outlines the minimum expectations we have for ethical business practices.

Great Southern Bank is committed to sustainable and ethical business practices across our operations and supply chain. We recognise that the actions of our Suppliers, can influence Great Southern Bank's ability to drive positive social, environmental, and economic outcomes in the communities in which we operate and beyond.

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.
- exercising our rights under our agreements with Suppliers, including by terminating agreements where that is appropriate.

#### Supplier's Commitment

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. We also require our suppliers to adhere to laws and regulations applicable to their businesses and operations. 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.

#### 1.1.1 The Code's purpose is to:

- set expectations of our suppliers, and their supply chain engagements in providing goods and services to Great Southern Bank.
- share our approach to being a responsible and sustainable bank including in the way we do business with our suppliers.
- ensure suppliers identify, mitigate, and manage their risks and sustainability practices (including environmental, social, and governance).



As a signatory to the **UN Global Compact and a supporter of the OECD Guidelines for Multinational Enterprises**, Great Southern Bank embraces a fair, sustainable, responsible, and ethical approach to procuring goods and services.

Great Southern Bank seeks to conduct business with organisations which share our values, abide by our principles and expectations (set out in this Code), and help support our commitments to operate in an ethical, socially, and environmentally responsible manner.

Our goal is to build relationships and collaborate openly with our suppliers to maximise the positive, and mitigate the negative, impacts of our procurement decisions.

Suppliers should inform Great Southern Bank if they are unable to meet the expectations outlined in this Code, and we may endeavour to work alongside and collaborate with them to improve their ability to meet these requirements.

### 2.0 Principles and Expectations

#### 2.1 Corporate Governance and Ethical Business Practices

Our approach to corporate governance is based on a set of values and behaviours that underpin our day-to-day activities, and work to promote transparency, fair dealing and the protection of our customers who are also our owners. A robust corporate governance structure is critical to managing and mitigating negative impacts to our business and our stakeholders. Our suppliers are expected to maintain strong corporate governance.

Great Southern Bank is committed to upholding ethical business practices in all of our operations. We are mindful not to pursue or take any improper advantage over our customers, competitors, Suppliers, and other stakeholders. We also recognise the need to exercise caution when providing gifts or entertainment to clients or suppliers, which must always be reasonable and commensurate with customary business courtesies.

#### To learn more please visit our Corporate Governance and Our Values pages:

Corporate Governance | Great Southern Bank Our Values | Great Southern Bank

#### 2.1.1 Suppliers must:

- comply with all applicable local, national, and international laws and regulations, including in relation to bribery and corruption, human rights, and ethical conduct.
- act ethically and transparently, avoid actual, potential, or perceived conflicts of interest with Great Southern Bank in their dealings, and have a policy or statement which commits employees to ethical conduct, standards, and behaviours.
- have a zero-tolerance approach to bribery and corruption with supporting mechanisms in place for reporting of unethical behaviour.
- have a zero-tolerance approach to human rights violations with supporting mechanisms in place for reporting and remediating human rights violations.
- have systems in place to identify, manage and mitigate material sustainability impacts and risks.



- Social Media:
  - Be responsible and courteous of others and refrain from disrespectful, unprofessional, harassing, defamatory or discriminatory activity.
  - Not act or speak on behalf of Great Southern Bank or their customers; represent any affiliation with Great Southern Bank or its customers or express any views attributable to Great Southern Bank or its customers unless explicitly authorised to do so.
  - Not use Great Southern Bank's logos unless explicitly permitted to do so in writing by Great Southern Bank.
- immediately disclose to Great Southern Bank if they breach any of the Principles and Expectations set out in this Code.

#### 2.1.2 Suppliers are encouraged to:

- establish and maintain a channel for employees and stakeholders to raise complaints, ensuring process confidentially and anonymity for investigating and remedying complaints.
- take an industry leadership role by adhering to all relevant industry, product, and service standards.



#### 2.2 Risk Management and Sustainability

#### **Risk Management:**

Our Risk Management Framework protects the interests of Great Southern Bank and our customers. The Framework ensures our products and services are well designed, appropriately governed, and ultimately delivered by team members who understand and are capable of adhering to the required risk policies and standards in their everyday practices.

#### Sustainability:

Being a sustainable bank means we are committed to doing business responsibly and in ways that benefit our customers, communities, and the environment.

Our approach to sustainability focuses on three key pillars:

- 1. **Environment:** Reducing our environmental footprint and responding to the changing climate.
- 2. **Social:** Improving financial inclusion and access to affordable and stable housing and advancing reconciliation.
- 3. Governance: Being a responsible bank and being transparent about how we conduct our business.

Learn more about our approach to sustainability: <u>Sustainability | Great Southern Bank.</u>

#### 2.2.1 Suppliers must:

- meet their compliance obligations.
- identify, mitigate, and manage their risks, including impacts and risks that their actions may pose to people and the environment.
- immediately disclose material impacts or risks to Great Southern Bank.
- have a business continuity plan, where required by Great Southern Bank, to minimise disruption to the business and its employees, customers and stakeholders, and impacts on the community.
- protect our business and customer information, and handle any information shared with the supplier in accordance with contractual and regulatory requirements.
- share information, upon request, on their sustainability strategy, material sustainability impacts and risks. This may include targets and performance. We may also ask the Supplier for permission to communicate our shared sustainability performance to our key stakeholders.

#### 2.2.2 Suppliers are encouraged to:

- continuously improve their performance in relation to management of sustainability impacts, risks and opportunities.
- validate financial and sustainability performance using credible and independent third parties and to share evidence of this with Great Southern Bank.
- develop a business continuity plan, to minimise disruption to the business and its employees, customers and stakeholders and impacts on the community.

#### 2.3 Health, Safety and Wellbeing

Great Southern Bank is committed to meet its legal and regulatory health, safety, and wellbeing obligations, including its obligation to manage the health, safety, and wellbeing risks of our team members, contractors, and visitors. Great Southern Bank has a Safety, Health & Wellbeing Policy, procedures, and key documents in place to ensure that we meet these requirements.



#### 2.3.1 Suppliers must:

- comply with all relevant local, national and international laws and regulations on work, health and safety management and reporting.
- provide and maintain a safe environment for their 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.
- have a documented health and safety statement or policy in place and a system to record, monitor and manage health and safety risks and incidents.
- where relevant, comply with any additional safety, health and wellbeing criteria, as specified by Great Southern Bank as part of the Supplier onboarding process.
- upon request, provide Great Southern Bank with evidence of compliance with health and safety practices.

#### 2.3.2 Suppliers are encouraged to:

Build employee wellbeing practices into their work, health, and safety programs.

#### 2.4 Human Rights

Great Southern Bank is committed to providing and promoting a workplace environment, culture and practices that are aligned to, and in support of, our purpose, values and ethics and integrity in practice, and that adheres to all regulatory and legislative requirements.

Our approach is underpinned by a commitment to respect human rights as set out in the International Bill of Human Rights which comprises of:

- The Universal Declaration of Human Rights,
- The International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights,
- UN Convention on the Rights of the Child, and
- ILO Declaration on Fundamental Principles and Rights at Work

and to support the UN Guiding Principles on Business and Human Rights.

Where we identify issues of concern, we will seek to better understand suppliers' processes and practices and work with them to resolve and improve these.

#### 2.4.1 Suppliers must:

- adhere to all internationally recognised human rights standards through their operations and business relationships, including their supply chain, and immediately and appropriately address any adverse human rights impacts.
- ensure all direct and indirect employees are legally entitled to work, are provided with legally required wages and entitlements, fair working conditions, and their rights to freedom of association and collective bargaining are respected.
- ensure they have policies and/or processes in place to identify, mitigate and address any
  form of human rights violations within their operations and supply chain, including human
  trafficking, slavery, servitude, forced labour, bonded labour, deceptive recruitment, forced
  marriage and the worst forms of child labour. If these policies or processes are not in place,
  suppliers must be willing to engage Great Southern Bank to uplift their approach to
  respecting and protecting human rights.
- comply with all applicable laws, regulations and international standards relating to the direct or indirect employment of children and ensure these are abided by in subcontracting



relationships. It is recommended suppliers set clear expectations of their supply chains regarding the prohibition of child/underage labour and children performing hazardous work.

#### 2.5 Inclusion and Diversity

Great Southern Bank is committed to ensuring equal employment opportunities (EEO) for all team members to access and enjoy the same workplace practices, rewards, resources, and opportunities regardless of their race, gender, sexual orientation, disability, or any other personal characteristic defining individuals as belonging to an identified group.

Great Southern Bank expects our suppliers to have similar commitments to inclusion and diversity, as well as having EEO, anti-discrimination, anti-bullying, and anti-harassment policies, grievance mechanisms and remediation processes in place.

Our Reconciliation Action Plan (RAP) demonstrates our commitment to supporting the financial and social inclusion and prosperity of Aboriginal and Torres Strait Islander peoples. Learn more: <u>Social Sustainability | Great Southern Bank</u>

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. Great Southern Bank seeks to engage suppliers who have diverse ownership, such as Indigenous owned businesses (e.g., as part of our approach to Reconciliation in Australia) as well as disability enterprises and 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 Great Southern Bank. Although we do not mandate this within our supply chain, we actively encourage it.

#### 2.5.1 Suppliers must:

- foster an inclusive workforce that reflects gender balance, gender identity, age, ethnicity, cultural background, religious belief, sexual orientation, marital or family status, disability, socio-economic background and perspective or experience.
- treat all employees fairly, ethically, respectfully and with dignity and have protections against direct and indirect discrimination, bullying and harassment.
- encourage gender equality and create a workplace environment that is fair, equitable, diverse, inclusive, accessible, flexible and supports wellbeing.

#### 2.5.2 Suppliers are encouraged to:

- develop measurable action plans where appropriate to improve inclusion and diversity in both operations and supply chain.
- seek diversity within their recruitment processes.
- create opportunities for diverse suppliers when providing goods or services to Great Southern Bank.
- build partnerships within the communities in which they operate to support local economies.

#### 2.6 Environmental Management

Great Southern Bank is committed to reducing our environmental footprint, responding to the changing climate and disclosing our impacts and risks.



We are committed to net zero by 2040. We have established science-based targets and a plan to reduce our operational and financed emissions.

While we work toward net zero, Great Southern Bank's operations are annually certified carbon neutral by Climate Active. Learn more: <u>Great Southern Bank | Climate Active</u>.

In the months and years ahead, we will prepare and respond to the physical and economic impacts of climate change on our business and the community.

Great Southern Bank was the first customer-owned bank in Australia to publicly disclose its climaterelated risks and opportunities in our 2022 Climate-Related Disclosure Report in line with the Taskforce on Climate-related Financial Disclosure (TCFD) framework.

Great Southern Bank is continuing to put processes in place to understand and manage our environmental impacts and risks related to our supply chains. We are working to reduce these impacts and promote low or no-emissions sourcing practices.

#### 2.6.1 Suppliers must:

- comply with all applicable local and national laws and regulations on environmental management and reporting, including immediate disclosure of any breach of these requirements.
- identify, mitigate, manage and report material environmental impacts and risks associated with their products and services, and from their operational footprint where relevant, including greenhouse gas emissions, air quality, energy efficiency, water and wastewater, waste and hazardous materials, biodiversity impacts, lifecycle impacts of products and services, and packaging.
- source and supply credible third-party certified products where contractually required.
- provide their greenhouse gas emissions data (as it relates to the goods or services procured by Great Southern Bank) for inclusion within our Scope 3 inventory as part of our disclosure and reporting requirements where relevant.

#### 2.6.2 Suppliers are encouraged to:

- collaborate with us in managing climate risk and support our goals to reduce our environmental footprint by reducing our supply chain emissions. This may include having appropriate governance and oversight in place, developing an action plan, and measuring and disclosing any material environmental impacts.
- take a leadership role in environmental issues faced by the business and its industry.
- drive innovation for positive environmental outcomes, practise circular economy principles and promote product stewardship for their goods and services.

#### 2.7 Information Management and Confidentiality

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

Great Southern Bank expects our suppliers to protect the information that we or our customers may share with them and to handle such information in accordance with applicable legal and regulatory requirements.

#### 2.7.1 Suppliers must:

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



Great Southern Bank as soon as possible upon becoming aware of any such loss, unauthorised access, or unauthorised use.

In addition, Great Southern Bank'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 Great Southern Bank,
- (ii) in accordance with applicable contract terms, and
- (iii) in accordance with applicable legal and regulatory requirements.



# 3.0 Implementation and Due Diligence

Great Southern Bank may undertake screening, due diligence, and assessments of its suppliers to determine levels of sustainability (including environmental, social human rights, modern slavery, and governance) risk and performance. This may include key suppliers completing a Sustainable Procurement Assessment, which provides Great Southern Bank with information required for onboarding, governance, monitoring, and reporting obligations throughout the lifecycle of the relationship.

Suppliers are required to comply with Great Southern Bank's screening and due diligence processes and are expected to respond with transparency and honesty, providing reasonable access to relevant documentation and supplier premises, and acting promptly on issues identified.

Suppliers must promptly notify Great Southern Bank of any actual or suspected instances of noncompliance with this Code within their operations or supply chain. Notification needs to include the steps the supplier is taking to investigate and address the issue and the proposed timeframe. Our goal is to collaborate and partner with our Suppliers to improve their corporate governance and/or capability to identify, manage and mitigate negative impacts on people and the environment.



## 4.0 Speaking Up

Great Southern Bank is committed to conducting our business with honesty, fairness, and integrity.

We encourage our suppliers, and sub-contractors to speak up where they suspect wrongdoing by us or have a concern about the conduct of any of our representatives in our operations or supply chain.

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

- their supplier/partner relationship points of contact, or
- via email to strategicpartnerships@gsb.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 Great Southern Bank's External Whistleblower Reporting Service as detailed below:

Great Southern Bank engages the services of Stopline, an Australian-based leading provider of whistleblower programs and related hotline and investigation services.

The Stopline Whistleblower Hotline is provided for any team member, supplier, or customer to anonymously report suspected or actual wrongdoing. Stopline can be contacted through the following means:

#### Stopline

Website: www.greatsouthernbank.stoplinereport.com Free call 8am to 8pm Monday to Friday: 1300 304 550 Email: greatsouthernbank@stopline.com.au Mail: c/o The Stopline Locked Bag 8, Hawthorn VIC, 3122 More information relating to Stopline can be found at: www.greatsouthernbank.stoplinereport.com







#### greatsouthernbank.com.au

Great Southern Bank, a business name of Credit Union Australia Ltd ABN 44 087 650 959 AFSL and Australian Credit Licence 238317.