

Supplier Code of Conduct

June 2025

It's Australian.
It's super.
And it's yours.

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1. Message from AustralianSuper

AustralianSuper and its related entities (collectively referred to as AustralianSuper or the Fund) are committed to ensuring our business partners, service providers, consultants and vendors (collectively Suppliers) support AustralianSuper in its desire to operate with the highest standards of ethical business conduct, integrity, and adherence to law.

The Supplier Code of Conduct (Code) sets out principles and expectations for Suppliers that are engaged by the Fund which are intended to be consistent with regulatory and legal frameworks governing our industry and global best practices in our industry.

Suppliers should ensure that they review the Code and operate in accordance with its principles. The most recent version of the Code will be available online and effective on the date that it is posted. AustralianSuper retains the right to modify or amend this Code from time to time, with or without prior notice to Suppliers.

2. Applicability

This Code shall apply to all Suppliers who engage in business relationships with the Fund or on behalf of the Fund.

This Code should be considered in addition to any legal contract or Purchase Order terms and conditions in place between AustralianSuper and any relevant Supplier.

3. Our Expectations

AustralianSuper colleagues operate with an understanding of our internal Code of Conduct Policy, and under the key values of Integrity, Excellent Outcomes, Generosity of Spirit and Energy, which support our objective to help members achieve their best financial position in retirement.

At AustralianSuper, we understand that our Suppliers are integral to our success and are treated with respect. We expect our Suppliers to operate their businesses, including when acting on behalf of the Fund, in a legal and ethical manner and in compliance with all applicable laws and regulations. We also expect our suppliers to ensure that work is performed freely without the use of modern slavery, including forced labour.

4. Compliance with the Code

The principles, as outlined in this Code, are important to AustralianSuper and we expect Suppliers to understand and adhere to them throughout their engagement and their relationship with the Fund.

The Fund maintains a due diligence process to assess relevant Suppliers. A Supplier's compliance with this Code may be reviewed via the Fund's ongoing monitoring of the relevant Supplier. The Fund may request confirmation from a Supplier as to their compliance with this Code, including evidence of the Supplier's compliance, as reasonably requested by AustralianSuper. In some instances, failure by a Supplier to adhere to the terms of this Code may result in a cessation of the Fund's relationship with that Supplier.

5. Principles

AustralianSuper expects that its Suppliers will implement and maintain corporate social responsibility and oversight policies and procedures across their organisations and supply chains, including employee 'Codes of Conduct'.

A Supplier Code of Conduct should set out the professional, legal, and ethical standards of behaviour expected of their personnel and business partners.

5.1 Human Rights

5.1.1 Humane Treatment

AustralianSuper expects that Suppliers will treat all workers with dignity and respect, including providing workplace environment conditions that promote respect, diversity, and inclusiveness. Suppliers are expected to conduct business in a manner consistent with the human rights principles encompassed in socially accepted frameworks (such as the UN Global Compact, UN Declaration of Human Rights, International Labour Organization).

5.1.2 Discrimination, Harassment, Bullying

Suppliers should promote workplace cultures that ensure adherence to applicable laws regarding discrimination, harassment, sexual harassment, bullying, vilification and victimisation. Suppliers should take reasonable and proportionate measures to eliminate unlawful behaviours as far as possible.

5.1.3 Equal Employment Opportunity

Suppliers should offer employees equal opportunity, free from discrimination in any employment related matters and in conformance with applicable laws and regulations. Discrimination based on race, religion, gender, gender identity, age, sexual orientation, disability, or other categories protected by local law should not be tolerated. Suppliers should promote a culture of equal opportunity for all, and employees are expected to be evaluated on their ability to perform their roles.

5.2 Labour Practices

5.2.1 Modern Slavery and Forced Labour

Suppliers should comply with all applicable labour and modern slavery laws, including ensuring that work must be conducted based on freely agreed terms and prohibiting usage of forced, bonded, or involuntary labour, slavery, servitude, the worst forms of child labour, deceptive recruitment practices for labour services including worker payment of recruitment fees, human trafficking or forced marriage. Suppliers should prohibit any demand for work/service from an individual under threat or coercion. Written employee agreements containing terms and conditions should be made available to all employees.

Suppliers should not withhold or destroy, conceal, confiscate, or deny access by workers to workers' identity or immigration documents.

AustralianSuper expects that Suppliers and their supply chains have modern slavery grievance mechanisms to identify and address potential modern slavery practices and that there is timely notification to AustralianSuper of any identified modern slavery practices.

5.2.2 Child Labour

Suppliers should comply with all applicable laws against child labour, including those relating to minimum age standards.

5.2.3 Freedom of Association

Suppliers should respect the legal rights of workers to freedom of association, including to organise and join associations such as unions, as well as participate in collective bargaining. Suppliers must not hinder the rights of workers to legally organise such associations, nor impose restrictions on those rights, in conformance with applicable laws. The Supplier's employment environments should foster mutual trust between management and their employees, whereby business standards are clearly articulated, and open communication is encouraged.

5.2.4 Remuneration and Employment Conditions

Suppliers should ensure that their employees' remuneration and employment conditions comply with applicable laws and regulations including (but not limited to) in relation to minimum wages, breaks and rest periods, working hours and other benefits (i.e. leave periods).

5.2.5 Safe work environment

Suppliers should implement appropriate precautions to prevent accidents and injury to workers. Suppliers should be proactive in implementing programs and practices to prevent harm to workers, and take initiative to improve workers' health, safety and wellbeing, including via documented health and safety policies and standards. Suppliers are expected to provide an adequate level of awareness and training to employees to promote a safe, healthy work environment, and to implement management systems to monitor compliance.

5.3 Environment

5.3.1 Climate impact

AustralianSuper expects Suppliers to be conscious of their impacts to climate and to maintain improved resource efficiency and reduced resource consumption, including of raw materials, energy, water, and fuel. Suppliers are expected to make reasonable efforts to eliminate or reduce levels of waste (both solid and wastewater) generated and to increase reuse, and recycling to reduce landfill impact. To reduce negative environmental impacts, Suppliers are encouraged to develop and use environmentally friendly solutions and practices.

5.3.2 Pollution and hazardous material

Suppliers are encouraged to operate their businesses in environmentally conscious manners, prioritising environmental safety and preservation. Suppliers are expected to operate in a proactive manner to encourage and manage the reduction of emissions of greenhouse gases and of toxic and hazardous pollutants. Suppliers are encouraged to identify and track greenhouse gas emissions and to set emission reduction goals.

5.3.3 Data Collection

AustralianSuper encourages Suppliers to collect data related to the consumption of raw materials, energy, water, fuel, greenhouse gas emissions and other sustainability data. If the Supplier collects such data, AustralianSuper may request the relevant Supplier to provide information on the relevant dataset on an ongoing basis.

5.4 Integrity and Ethics

AustralianSuper operates in an environment where the trust of our members and reputation for integrity are critical to our success and embedded in our values and principles. Maintaining ongoing compliance with applicable laws and regulations is a priority for us. We expect that all Suppliers with whom we engage will also use their best endeavours to also ensure ongoing compliance with applicable laws and regulations.

5.4.1 Business integrity

Suppliers should not engage in any illegal or unethical behaviours and should conduct business in accordance with fair business practices. Suppliers are expected to implement and maintain processes that allow their employees and clients to confidentially report incidents of unethical behaviour.

5.4.2 Anti-Bribery and Anti-Corruption (ABAC)

Suppliers are expected to implement measures, including documented policies and standards, to ensure that all employees are aware of the requirements to comply with laws and regulations relating to corruption, bribery, and financial crimes. Policies should include coverage of the Suppliers' agreed limits and reasonable dealings for gifts, entertainment, and hospitality. No gifts, entertainment, or hospitality should be offered or accepted where there is reason to believe or conclude that an intent to improperly influence any business dealings exists.

5.4.3 Fraud, Anti-Money Laundering (AML) and Counterterrorism Financing (CTF)

AustralianSuper expects that Suppliers will maintain risk and governance programs covering fraud and AML/CTF, including documented policies and standards, which provide employees with management expectations and direction in relation to managing these risk areas in conformance with all applicable laws and regulations. Suppliers are encouraged to provide related training and awareness to employees and maintain registers of employee compliance.

5.4.4 Conflicts of Interest

Suppliers are expected to avoid situations that may lead to a conflict of interest, or suspected conflicts of interest, and to use good judgement in decisions that shall not allow bias, conflict of interest, or inappropriate influence over others or overriding of responsibilities. Suppliers are requested to voluntarily declare to AustralianSuper any identified or perceived conflicts of interest involving personnel or services which may be in breach of this Code.

5.4.5 Confidentiality and Privacy

Where provision of services to AustralianSuper involves processing and/or storage of confidential and/or personal information, Suppliers are expected to abide by their contractual obligations to AustralianSuper relating to the protection, collection, and proper handling of all relevant confidential and/or personal information, as well as comply with all applicable laws and regulations (including, amongst others, the Privacy Act 1988 (Cth)).

5.5 Supply Chain Management

Suppliers are expected to consider the potential impacts from businesses engaged in their supply chain and maintain a governance structure to review and oversee risk and compliance. AustralianSuper expects that its Suppliers will implement governance structures within their own supply chains, to ensure that any goods and services providers which are in the Suppliers' supply chains for the provision of goods and services to AustralianSuper also adhere to the same minimum standards which are expected of our Suppliers, as outlined in this Code, including in relation to human rights and labour practices.

6. Reporting Violations / Raising Concerns

Suppliers and their employees, or supply chain service providers and their employees, are encouraged to raise any compliance concerns or suspected violations of this Code to AustralianSuper via their business or account relationship contact, or via the external reporting avenues listed in the **AustralianSuper Whistleblower Policy**.

If applicable, AustralianSuper (or a delegate) may conduct further investigation and may require assistance of the Supplier or its employees.

Contact us

Visit **australiansuper.com**

Call **1300 300 273**

8am to 8pm AEST/AEDT weekdays

Email **australiansuper.com/email**

Mail **GPO Box 1901**

Melbourne VIC 3001

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