

About Suncorp

Suncorp Group Limited is an ASX-listed Trans–Tasman insurance company, headquartered in Brisbane, Australia. With a heritage dating back more than 100 years, the Group provides insurance products and services through some of Australia and New Zealand’s most recognisable brands. A dedicated team of around 10,500 people live Suncorp’s purpose of building futures and protecting what matters every day to deliver valued outcomes for our customers.

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, and sustainable. 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 sustainable procurement 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.

Sustainability

Suncorp is committed to building a resilient and sustainable organisation that values positive stakeholder outcomes. We proactively manage the material environmental, social and governance (ESG) risks and opportunities identified by Suncorp in consultation with our key stakeholders. As we fulfill our purpose and deliver on our strategic priorities, we aim to create long-term value for our people, customers, communities and shareholders.

Suncorp collaborates with a broad range of stakeholders to identify and manage business risks and opportunities, advocate for positive outcomes, and ultimately create long-term value. Stakeholder engagement is highly valued by Suncorp as it builds trust and confidence, helps us make informed and balanced decisions, and determines our approach to addressing the topics most material to us and our stakeholders.

More information can be found here: [Sustainable business | Suncorp Group | Suncorp Group](#)

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 to the Suncorp Group 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:

- Satisfy the requirements of Suncorp's Human Rights Statement as it is applicable to them. Suncorp will seek to work with businesses who share our commitment to human rights.
- Comply with human rights and fair employment practices in accordance with the International Bill of Human Rights and the International Labour Organisation's (ILO) Declaration on the Fundamental Principles and Rights at Work.
- 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 to the Suncorp Group 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, financial, natural hazard and climate 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 Transition Plan. We encourage opportunity for a diverse range of suppliers which may include but is not limited to:

- Majority owned Indigenous 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 who are owned, employ and empower diversity including people who are culturally, age and ability inclusive.
- Social Enterprises.

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 to the Suncorp Group 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 insurance products and services that meet the needs of customers. Suncorp complies with the Australian Consumer Law.

Suppliers to the Suncorp Group 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, which sets out how Suncorp manages and secures the personal information it holds, applies to our suppliers and we make this available to suppliers.

Suppliers to the Suncorp Group 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 to the Suncorp Group 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 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 the Suncorp Group 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 to the Suncorp Group 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, supporting you to speak up and report any issues. Suncorp recognises the importance of ensuring a safe, supportive and confidential environment for people to report any issues or wrongdoing. There are a number of options available to you to raise a concern, including via our anonymous Whistleblower service.

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

Option 1	Raise your concern directly with your supplier relationship point of contact, they will work with you to understand the concern and put a plan in place to XYZ?
Option 2	Raise your concern via email to our Procurement team, procurement@suncorp.com.au . <u>A team member will be in contact to discuss further.</u>
Option 3	Raise your concern confidentially via Suncorp Whistleblower Service (24-hour service managed by Deloitte).

Suncorp's Whistleblower Policy

The Whistleblower Policy is designed to help you speak up confidentially where you suspect or observe behaviour that is illegal, dishonest or a breach of law (i.e. about Reportable Conduct), if you are not able to raise the issue directly with your Suncorp contact for any reason.

You are encouraged to read Suncorp's Whistleblower Policy to understand the process of reporting a concern. You can access the Policy by clicking here. (Link: [Whistleblower-Policy-AUG-2024.pdf \(suncorpgroup.com.au\)](#))

There are a number of ways to contact the Suncorp's Whistleblower Service including via phone, website, email or post. All options can be accessed through the Whistleblower Policy.

Accessibility requirements

- If you require additional accessibility support, please make this known to ensure you are able to access the service.
- If you do not speak or write in English, you are able to send through via website or email in your chosen language, this will then be translated to English. Alternatively, you can request an interpreter to be included on the call.