

## About Suncorp

Suncorp Group Limited is a leading bank, superannuation business and general and life insurer with brands in Australia and New Zealand. Suncorp is a top 20 ASX-listed company with \$97 billion in assets, employ approximately 13,400 people, and serve close to nine million customers across Australia and New Zealand.

Suncorp New Zealand refers to the New Zealand related and associated companies of Suncorp. In New Zealand, Suncorp is a leading general and life insurer through its many brands including Vero and AA Insurance.

## Procurement and Outsourcing at Suncorp NZ

Suncorp NZ 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 NZ'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 NZ. This document is intended to be read in conjunction with the binding contractual terms and conditions that Suncorp NZ 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 NZ.

## Corporate Responsibility

Creating and preserving value for Suncorp NZ'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 NZ'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: <https://www.suncorp.co.nz/corporate-responsibility.html>

Suncorp NZ 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 NZ's Boards believes the highest standards of corporate governance are essential for sustaining longterm 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 NZ's Code of Conduct and Whistleblower Policy apply to our suppliers and we make these available to suppliers on the Suncorp NZ website <https://www.suncorp.co.nz/corporate-responsibility.html>

Suppliers are expected to:

- Comply with all laws and regulations including bribery, corruption, money laundering and prohibited business practices.
- Comply with New Zealand sanction laws and UN Security Council sanction regimes and preclude from the supply chain any goods or services sources from sanctioned persons, countries or organisations.
- Comply with Suncorp NZ's Code of Conduct.
- Comply with Suncorp NZ'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 NZ in any form without express written permission from an authorised Suncorp NZ 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 NZ.
- 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 NZ 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 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 all reasonable requests and direction of Suncorp necessary for Suncorp to comply with its obligations at law including under 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 NZ as we strive for a workplace free from preventable injury or illness. Suncorp NZ is committed to workplace safety and wellbeing and aims to create a safe environment for all people who work with Suncorp NZ.

Suppliers are expected to:

- Be compliant with all relevant health and safety legislation, including but not limited to the Health and Safety at Work Act 2015.
- 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 NZ Safety and Wellbeing Policy and all Suncorp NZ site-specific safety requirements.

## Community Investment

Suncorp NZ 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 NZ seeks to engage suppliers who also look to make a positive contribution to their local communities.

## Supplier Diversity

At Suncorp NZ, 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 NZ will proactively identify opportunities in our supply chain to meet commitments under our Financial Inclusion Action Plan, and Climate Change Action Plan. We encourage opportunity for a diverse range of suppliers which may include but is not limited to;

- 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 NZ 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 suppliers where appropriate. We ensure a diverse range of supplier by engaging with both small-to-medium enterprises and multi-national organisations (as appropriate).

## Impact on Environment

To create sustainable value, we adapt our business to evolving market conditions. Suncorp NZ 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 NZ 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 NZ on measurement and reporting of greenhouse gas emissions in the supply chain.

## Product Safety

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

Suppliers are expected to:

- Ensure all products and services are safe and meet all 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

Suncorp New Zealand is committed to protecting our data and the privacy of our customers personal information. Data security is integrated into all aspects of our business to ensure an appropriate balance between value and risk to our business and customers.

Suppliers are expected to, where applicable:

- Comply with the requirements of their contracts in respect of confidentiality
- Comply with the Privacy Act and all other applicable legislation
- Comply with other related security policies and standards when notified and provided by Suncorp NZ

## Business Resilience

Business resilience principles are embedded through Suncorp NZ'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 NZ in the event that the regular operations are disrupted that could impact supply to Suncorp NZ.
- 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 NZ 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 NZ 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 NZ will work collaboratively with suppliers to implement and comply with this Code of Practice. Suncorp NZ 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 NZ within 48 hours.
- Respond to requests for review and or documentation in a timely manner.
- Provide transparent, correct and complete information.
- Support Suncorp NZ during on-site visits.

## Raising Concerns

Suncorp NZ is committed to fostering a culture of honest and ethical behaviour. Suncorp NZ 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
- 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 NZ's External Whistleblower Reporting Service

## 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.