



nbn[®] Supplier Code of Conduct



Updated September 2023



At **nbn**, we are firmly committed to conducting our business with the highest standards of ethical and social responsibility to protect the rights and wellbeing of individuals and the environment. This code of conduct (Code) reflects the principles embraced by **nbn** to act in pursuit of this commitment and outlines how we endeavor to conduct our business to enhance the wellbeing of the communities and the environment in which we operate.

We trust that our suppliers share, and will work with us to promote, the principles outlined in this Code which are intended to emphasise and promote our shared commitment to ethical, safe and socially responsible practices and behaviours.

We expect our suppliers to ensure that their employees and other group entities are aware of, and comply with, this Code. This Code sets some basic principles of good corporate behaviour. We expect our suppliers to also communicate this Code to their suppliers, subcontractors, agents and other parties who are engaged by the suppliers so that they are aware of, understand and implement the practices set out in this Code when providing goods or services to, or on behalf of, **nbn**.

In this Code, references to the 'supplier' are intended to refer to the supplier, the supplier's other group entities, officers, employees, subcontractors, agents and other parties in their supply chain (as the context permits).

For questions relating to this Code or our expectations of suppliers, please contact supplierpolicies@nbnco.com.au.

Human Rights and Workplace Relations

We expect our suppliers to commit to respect the human rights of all people who they may impact including their own workers, workers in their supply chain and community members.

In relation to workers, this includes an expectation that suppliers will seek to respect the rights to freedom of association, freedom from forced and compulsory labour, freedom from child labour, freedom from discrimination in respect of employment and occupation, the right to a safe and healthy workplace and rights in relation to working hours, wages and benefits.

Our minimum standards are:

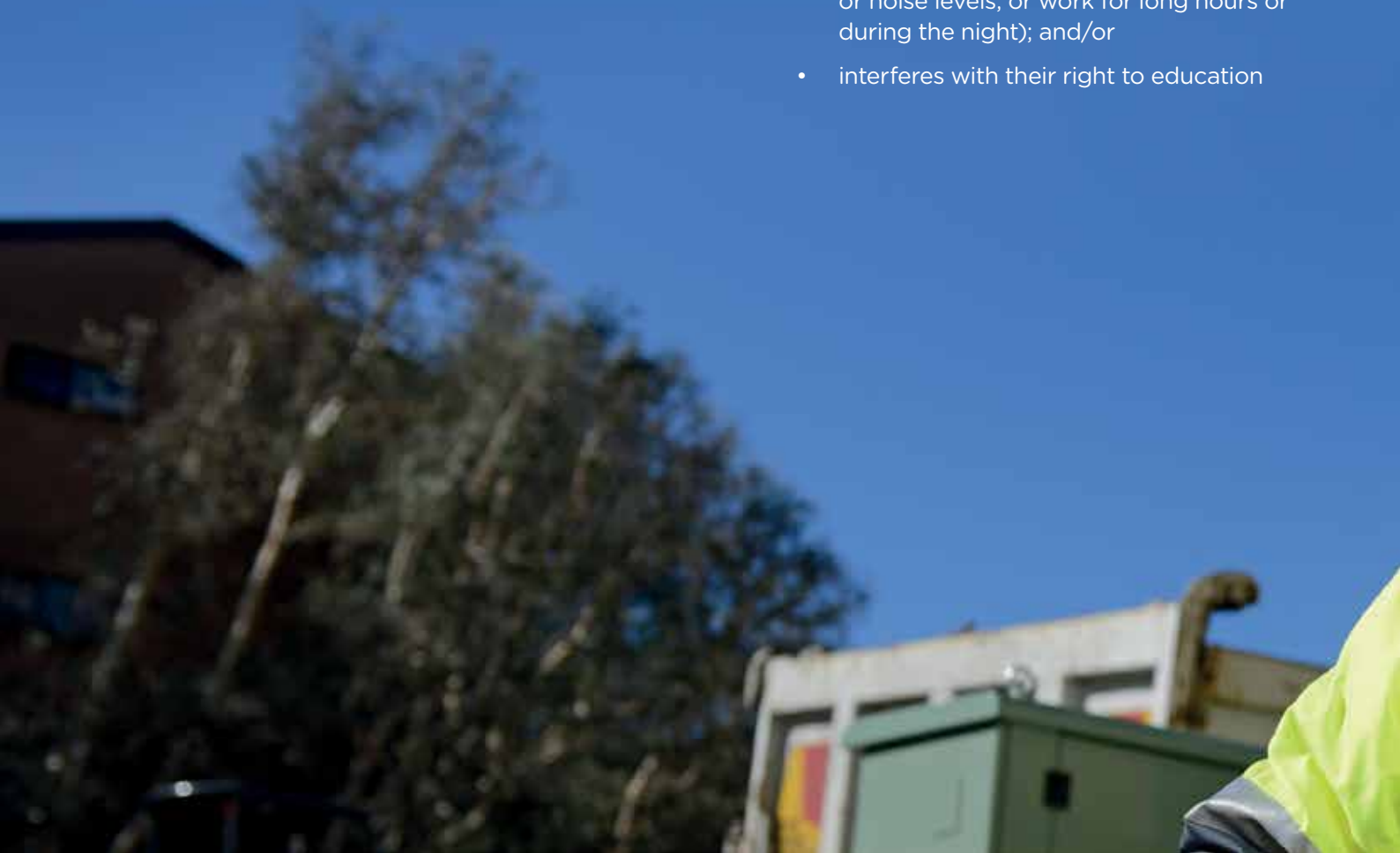
Child and underage labour

Child labour is not permitted in our supply chain.

The minimum age for employment or work is the higher of: (i) the minimum age for employment in the relevant country in which the work is being performed; and (ii) the standards set by the International Labour Organization.

Children under the age of 18 must not be employed in work that:

- is mentally, physically, socially or morally dangerous and harmful (including hazardous work such as work with dangerous machinery or handling heavy loads, work that exposes them to hazardous substances or temperatures or noise levels, or work for long hours or during the night); and/or
- interferes with their right to education



Modern slavery

Modern Slavery in any form is not permitted in our supply chain. Modern Slavery includes forced, bonded or compulsory labour, servitude, human trafficking, deceptive recruiting practices and the worst forms of child labour.

Our suppliers must not require their workers to provide money as a condition of their employment and any recruitment-related fees or expenses must be paid by our suppliers and not their workers.

Additionally, workers' government-issued identification, passports or work permits must not be retained by suppliers and, to the extent that any such documents are required to confirm workers' identities or working rights, they must be returned to the relevant worker immediately afterwards.

All work must be voluntary, and members of our suppliers' workforces must be free to leave their employment on providing reasonable notice in accordance with applicable laws and regulations.

Freedom of association and collective bargaining

Our suppliers must respect the rights of their workers to be free to decide on joining trade unions or similar workers' organisations and to be free of any discrimination, harassment, intimidation, or victimisation for their choice to join these organisations or engage in other lawful industrial activity.

Working hours, wages and benefits

Working hours for our suppliers' workforce must not be excessive in light of the relevant role and must comply with the laws and regulations in that country in respect of working hours, rest periods and periods of leave.

Any overtime work suppliers require their workforce to perform must be in accordance with applicable laws and regulations.

Our suppliers must comply with applicable laws, regulations and industrial instruments relating to wages and benefits (including minimum wages and overtime pay) and in ensuring that the supplier's workforce is paid in a timely manner.

We expect our suppliers to ensure that all members of their workforce understand their employment conditions and when determining these employment conditions, consideration should be given to the type of work to be performed, the market rate for that type of work and any statutory minimum wage in that country.





Discrimination, harassment and abuse

We expect our suppliers to act with dignity and respect toward their workforce and to build a safe workplace, including by promptly taking action against inappropriate workplace behaviour.

Our suppliers should not engage in or tolerate discrimination on any unlawful ground, including due to gender (or gender identity or expression), physical, mental or intellectual abilities, race, ethnicity, age, sexual orientation, intersex status, relationship status, family or carer's responsibilities, pregnancy, socio-economic status, culture and identity, religious or political beliefs or professional background experience.

Our suppliers should not use or tolerate threats, acts of violence, harassment or physical, mental, verbal or sexual abuse in its dealings with their workers or when providing goods or services to, or on behalf of, **nbn**.

Diversity, equity and inclusion

Our suppliers should seek to adopt, where appropriate, practices which promote diversity and inclusion within their workforce and supply chain.

Some of the ways that we promote diversity and inclusion within our organisation include:

- implementing a Diversity, Equity and Inclusion policy and strategy that is currently focused on:
- fostering an inclusive workforce culture across **nbn** and developing inclusive leadership capability in our leaders;
- increasing female and Australian First Nations Peoples' participation in the workforce;
- building an accessible and inclusive workplace to assist those with disabilities to participate fully in the workforce; and
- supporting and celebrating the awareness and inclusion of lesbian, gay, bisexual, transgender, intersex and other gender diverse employees.
- facilitating equal employment opportunities based on ability, performance and potential;
- maintaining and looking to grow all existing commercial relationships with Australian First Nations owned businesses in line with our existing procurement policies;
- establishing initiatives to support inclusive and flexible work practices, including through paid parental leave and flexible work arrangement policies; and
- integrating diversity approaches into our key processes within **nbn**, including recruitment, training, performance management, reward, communication, stakeholder engagement, procurement and product development.

A close-up photograph of a man with a beard and mustache, smiling. He is wearing a white hard hat, clear safety glasses, and a high-visibility orange and yellow safety vest over a dark blue collared shirt. The background is a blurred construction site with a large piece of machinery, possibly a forklift, visible.

Health, safety and environment

Health, safety and the environment (HSE) within our supply chain is a commitment considered above all other business matters. We value our employees, contractors, customers, suppliers and environment in which **nbn** operates.



Our suppliers must, where practical in carrying out the Supplier's activities:

- maintain a safe and healthy workplace;
- comply with all environmental laws;
- comply with all HSE laws;
- implement continuous improvement and management systems to ensure compliance and effective controls;
- adopt early intervention programs and rehabilitation to prevent injuries and illness;
- comply with **nbn**'s HSE requirements as set out in **nbn**'s policies (as published on **nbn**'s website) and contractual arrangements with suppliers;
- provide all necessary supervision, training, instruction, equipment, resourcing and information to all workers;
- consult on issues that may affect health and safety or impact the environment;
- do all things reasonably necessary to reduce energy, greenhouse gas emissions, water and natural resources consumption and waste generation;
- integrate HSE into the planning, design, importing, manufacturing and disposal of goods;
- review, monitor and evaluate HSE performance; and
- listen to and consider community and customer views on HSE issues arising from work carried out, including the design, construction, installation, maintenance and operation of the **nbn**[®] network.

Ethical behaviour and good business practices

Business integrity

We expect our suppliers to act with the highest of ethical standards and with professionalism, honesty, integrity and fairness in every aspect of their business. This includes:

- being beyond reproach in matters of trust, honesty and confidentiality;
- behaving in a fair and consistent manner in all dealings;
- respecting cultural, ethnic and religious differences;
- acting responsibly to mitigate risk and safeguard customers, employees;
- brand, reputation, assets, premises and resources;
- promoting socially responsible, sustainable procurement and supply chain management practices;
- having a grievance mechanism available for workers and other stakeholders to raise concerns;
- preventing or avoiding situations that give rise to any actual, potential or perceived conflict of interest with **nbn**'s interests or the provision of goods or services to, or on behalf of, **nbn** and promptly advise **nbn** of any such conflicts that arise.

Fraud, corruption and whistleblowing

We are committed to the proactive prevention, identification, assessment, evaluation, monitoring and management of fraud and corruption risks. Bribery, fraud and corruption are not tolerated by **nbn**.

We expect our suppliers to not engage in any form of corruption, including extortion, fraud or bribery, and to comply with all laws and regulations including those relating to bribery, corruption and prohibited business practices.

As part of the provision of goods and services to **nbn**, our suppliers' officers, employees and subcontractors are regarded as public officials and therefore subject to the legislative requirements under the National Anti-Corruption Commission Act 2022 ('NACC Act').

Knowledge or genuine suspicion of fraud or corruption should be reported promptly to the **nbn** Fraud Management and Investigations team at fraudandinvestigations@nbnco.com.au

nbn's 'Whistleblower Policy' (available at nbnco.com.au) is another available reporting channel further outlining the obligations

in relation to the NACC Act. It contains legislatively supported mechanisms to ensure genuine concerns regarding potential misconduct or an improper state of affairs in relation to **nbn**, including any wrongdoing, or maladministration or suspected unethical or unlawful conduct can be disclosed anonymously or otherwise without fear of reprisal or detrimental conduct and with the support and protection of **nbn**.





Resilience and business continuity

At **nbn**, resilience and business continuity are important foundations for delivering access to a highly available secure and resilient broadband network. Our supply-chain is a key enabler to this. We expect our suppliers to have a sufficiently robust resilience and business continuity program to prepare for known and emerging business disruption risks appropriate to their business, operating environment and upstream supply-chain. Our suppliers must also be able to demonstrate capabilities

to recover their business operations from disruptive events to mitigate or limit any impact on the supply of goods or services to **nbn**. Additional risk controls and resilience requirements may be communicated to suppliers depending on the nature and criticality of goods or services being supplied to **nbn**.

Security and privacy

We collaborate with our suppliers, building strong relationships founded on trust and respect, with a focus on making the **nbn** network safe and secure.

Our suppliers should respect the privacy rights of their employees and all parties that they deal with and protect all data that they store or access. This includes complying with applicable privacy laws and regulations.

Confidentiality and intellectual property

We expect our suppliers to respect all **nbn** and third party confidentiality and intellectual property rights, and to take appropriate steps to protect and maintain the confidentiality of all **nbn** confidential information to which it has access. Our suppliers should only use **nbn**'s confidential information and intellectual property in accordance with their contractual arrangements with **nbn**.

Publicity and advertising

Our suppliers must not:

- use **nbn**'s name or logos in publicity or advertising;
- use the suppliers' business relationships with **nbn** to imply any endorsement by **nbn** of the suppliers' goods or services; or
- make any representation or statement for, or on behalf of, **nbn**,

without our prior written consent.

Trade sanctions

Our suppliers are expected to comply with all economic and trade sanctions in accordance with applicable laws and regulations.

Management Systems

We expect our suppliers to seek to facilitate compliance with this Code through its written corporate policies, practices, procedures and management systems.

Depending on the context, these may include:

- processes which facilitate compliance with, and identify risks of non-compliance of, the principles in this Code;
- periodic assessments of the supplier's compliance with this Code and reporting of relevant compliance information to **nbn**;
- processes which enable the timely correction of any non-compliance with this Code;
- ways the principles in this Code are communicated to other actors within their supply chain; and
- appropriate training for relevant members of their workforce to ensure appropriate understanding of the principles in this Code.

nbn may ask to see those policies, and any other reasonably supporting documentation, to demonstrate a supplier's compliance with this Code and for the purposes of **nbn**'s risk management and reporting systems.

nbn and the Caretaker Conventions

Caretaker conventions apply to **nbn** in the lead up to the Federal elections.

These conventions may impact timings of tenders or **nbn**'s ability to enter binding commitments during the caretaker period, and may also result in a tender being revised or cancelled. For further information about Caretaker Conventions see www.pmc.gov.au/resource-centre/government/guidance-caretaker-conventions



The Code

Application of this Code

This Code is formally incorporated into our contracts with all of our suppliers. To the extent that our contractual arrangements contain more detailed requirements in respect of any principles covered in this Code, this Code is intended to supplement (and not override) those contractual obligations.

KPMG FairCall

FairCall is an independent, confidential hotline and reporting service that can be used by suppliers and their workers, and other stakeholders, to raise a grievance.

The contact details for KPMG FairCall are:

Telephone: 1 800 179 054

Web-based access:

<https://www.kpmgfaircall.kpmg.com.au/nbn>

Postal Service: The KPMG FairCall Manager,
KPMG Forensic, PO Box H67, Australia
Square, 1213, Sydney

Compliance with this Code

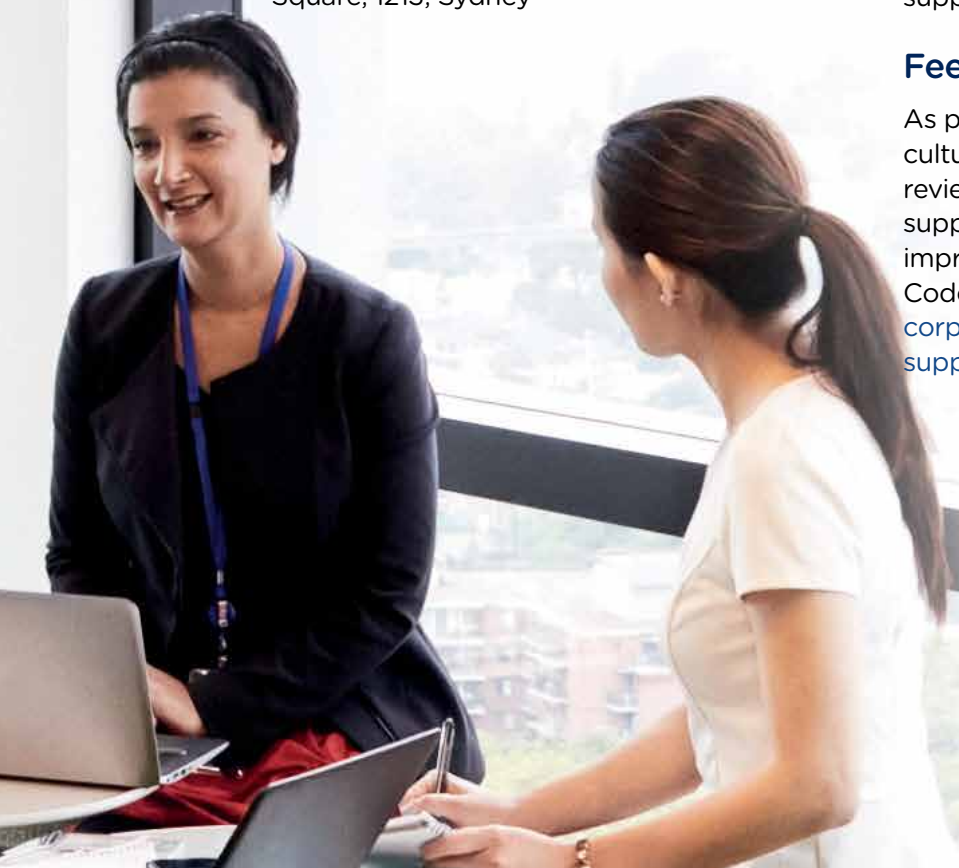
In some circumstances, we may require our suppliers to complete self-assessments and/or an annual declaration which confirms their compliance with this Code.

Our suppliers must promptly notify **nbn** if they become aware or reasonably suspect that they or another party in their supply chain is unable to comply with the principles in this Code.

If a supplier is unable to, or fails to, comply with this Code, **nbn** will discuss this issue with the supplier and may require the supplier to take such steps as **nbn** considers necessary, acting reasonably and only requiring steps that are proportionate to the relevant failure to meet this Code, to address the impact of, and remediate, the non-compliance. Where a supplier is not willing to address and/or remediate the non-compliance, **nbn** may consider terminating its relationship with the supplier.

Feedback and review

As part of **nbn**'s continuous improvement culture, this Code is subject to ongoing review. **nbn** appreciates feedback from suppliers including suggestions for improvement. The current version of this Code can be found at www.nbn.com.au/corporate-information/about-nbn-co/suppliers#tab4



For matters relating to this Code, please contact
supplierpolicies@nbnco.com.au