



Our expectation is that our suppliers and their employees, related entities and supply chains operate in a legal, ethical and socially responsible way.

This Supplier Code of Conduct (**Code**) outlines the minimum standards we expect our suppliers to meet and aim to exceed.

1. What and who does this Code apply to?

This Code applies to all our procurement activities and suppliers.

A reference to "you" or "supplier" is a reference to any person or entity that supplies any goods and/or services to us.

We expect all existing and new suppliers to meet or exceed the minimum standards outlined in this Code.

We encourage you to communicate the substance of this Code to your employees, related entities, suppliers, agents and subcontractors and support them in understanding and complying with this Code by maintaining appropriate policies and procedures.

The expectations outlined in this Code are not intended to supersede or alter any relevant laws, regulations, industry codes, applicable standards and contractual obligations, to the extent they contain additional obligations or higher standards than those set out in this Code.

If you have any questions on how this Code applies to any procurement activity, please discuss them with your contact at Housing Australia.

2. Compliance with Housing Australia policies and procedures

We require all existing and new suppliers (and their employees, subcontractors and other personnel) to comply with Housing Australia's policies and procedures which are relevant to providing the goods and/or services required, as notified by Housing Australia from time to time.

3. Ethics, integrity and conduct

We expect ethical conduct from all our suppliers and their compliance with all applicable laws. This extends to all business activities, relationships, sourcing and operations.

3.1 Business integrity

You are expected to comply with all laws applicable to you and your business, including those related to anti-bribery, anti-corruption, anti-money laundering, modern slavery, sanctions, and export and trade controls.

You must not engage in, directly or indirectly, any fraud, corrupt activity (including bribery), exploitation, collusion or other criminal activities.

You must also ensure your agents, intermediaries and subcontractors do not engage in such activities, directly or indirectly, in relation to any procurement.

Housing Australia refers allegations of bribery, corruption, money laundering, terrorism financing and other corrupt or criminal activity to the appropriate authorities.

3.2 Professional conduct

Your business should be conducted in a way that demonstrates sound management.

This includes promoting a collaborative relationship where purchasers and suppliers work together to resolve issues in a timely, legitimate and respectful manner. This helps to avoid contractual disputes and promotes good working relationships.

3.3 Confidentiality

You must not misuse or disclose to any unauthorised person any private, confidential, personal or commercially sensitive information that you have received as a result of your dealings with us without our prior approval, unless required by law.

3.4 Data security

You are expected to immediately notify us of any data breach which may have resulted in unauthorised access or disclosure of our private, confidential, personal or commercially sensitive data (including that of third parties which we hold) or other information received as a result of your dealings with us (complying with our Protective Security Policy Framework and any applicable legislative timeframes and obligations).

3.5 Corporate governance

You are expected to maintain sound administration processes, risk and corrective action systems and resolve serious incidents in a way that deals with the incident expediently and minimises harm.

You should have appropriate written procedures and systems in place designed to prevent and combat bribery and corruption.

You are expected to familiarise yourself with our Fraud Control Policy on our website.

You should have in place adequate procedures to prevent an associate (such as an employee, agent or subsidiary) from bribing foreign public officials.

The Bribery Prevention Network has useful resources to help businesses understand and implement more robust anti-bribery procedures and measures.

3.6 Conflicts of interest and gifts

You must ensure that all conflicts of interest (whether actual, perceived or potential) relevant to your relationship with us are disclosed to us as soon as possible.

Gift giving to our employees is generally discouraged and we may decline gifts and benefits you offer to us.

If we do accept a gift or benefit offered by you with a value of more than \$100.00 (excl. GST), it will be publicly reported on our website with your name and the gift or benefit details to provide public transparency.

3.7 Transparency and record keeping

You are expected to maintain complete, accurate and proper records (in accordance with applicable laws and standards) of all financial transactions and information relating to your business activities, ethics, integrity and conduct, labour and human rights, health, safety and environmental practices, and engagement of third parties including agents.



3.8 Embracing human rights

We are committed to respecting internationally recognised human rights.

We expect you to manage your operations in a manner that respects the human rights of individuals, having regard to international human rights norms, and obligations as set out by the United Nations, the International Labour Organisation, and other relevant laws, treaties and international instruments and codes of conduct.

All workers in our supply chain (and yours) are entitled to fairness, dignity and respect. You are expected to provide a fair and ethical workplace, which upholds high standards of human rights and has appropriate labour and human rights policies and practices in place.

3.9 Combatting modern slavery

As a reporting entity under the *Modern Slavery Act 2018* (Cth), we are required to report on actions we have taken to address any risks of modern slavery within our operations and supply chains and maintain responsible and transparent supply chains.

The *Modern Slavery Act 2018* (Cth) defines "modern slavery" as including human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and child labour.

Your entity may also be subject to these or similar obligations (including under the *Modern Slavery Act 2018* (NSW) or similar legislation in other jurisdictions).

You should make all reasonable efforts to ensure that your business and any parties in your supply chain are not engaged in modern slavery.

You must never use, or knowingly use in your supply chain, child labour or any form of forced, bonded, indentured, involuntary or illegal labour.

You must also respect workers' freedom of movement and freedom of association rights in accordance with applicable laws.

3.10 Fair work practices

We are committed to ensuring that workplace rights and entitlements are respected.

You should ensure your operations and supply chain complies with the *Fair Work Act 2009* (Cth) (as applicable) and all other applicable workplace laws, regulations and regulatory instruments, in particular with respect to providing fair and appropriate pay, benefits and working conditions, including hours of work, consistent with the laws of the relevant jurisdiction.

We also expect you to use your best efforts, make reasonable enquiries and have reasonable oversight to ensure these principles are followed and there is no modern slavery, or other exploitative practices, occurring for any offshore labour, services, materials or goods supplied to us.

3.11 Equal opportunity workplace

We value businesses that have policies and practices in place to encourage diversity and ensure equal employment opportunities for all people.

You are expected not to discriminate against any worker based on race, colour, sex, sexual orientation, age, physical or mental disability, marital status, family or carer's responsibilities, pregnancy, religion, political opinion, national extraction or any other status protected by law, including in your hiring and other employment practices.

You are also expected to comply with all applicable laws in this regard.

3.12 Keeping workers healthy and safe

Worker health, safety and wellbeing is important to us.

You are expected to comply with all workplace health and safety laws and regulations and to have sound work health and safety management practices.

This may include provision of training, proactive engagement with employees and stakeholders and active workplace hazard management.

We expect you to commit to providing a workplace free of bullying, harassment, victimisation, abuse, unlawful or inhumane treatment.

3.13 Environmental management

Our corporate values include a commitment to uphold best practice environmental and social standards by addressing our environmental footprint and environmental considerations in our transactions (in accordance with our Good Corporate Citizenship Policy). See our Annual Report on our website for more information.

You must comply with all applicable laws and regulations relating to the environment, including any environmental management and reporting obligations.

We encourage you to be mindful of the environmental impact of your operations and to adopt a continuous improvement approach in this regard.

3.14 Compliance and reporting

We expect you to monitor your compliance with this Code and that you have in place appropriate mechanisms for reporting any concerns to us (including in relation to any material failure to comply with this Code or our contractual arrangements) and processes for their resolution.

We are committed to working with you where appropriate, to implement remediation plans designed to achieve compliance with this Code.

Should remedial action not be taken with respect to any material breach within reasonable timeframes, we may reconsider our business relationship with you.

We reserve the right to review compliance with this Code and expect our suppliers to cooperate in good faith and provide information reasonably required by us to perform such a review (including by allowing access to your systems, data, records and information to the extent reasonably required, including in relation to your supply chain and agents).

If you suspect or are aware of any serious wrongdoing, you may be an eligible person to make a Public Interest Disclosure. Further information is available on our website and on the Commonwealth Ombudsman website.

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