



18 January 2021

Supplier Code of Conduct

United Super Pty Ltd and Trustee of the Construction and Building Unions Superannuation Fund (Cbus)

Cbus is one of Australia's largest industry superannuation funds and the national industry fund for the construction, building, infrastructure and allied industries. Established in 1984, Cbus provides superannuation benefits to approximately 775,000 members, has assets over \$54 billion, and accepts contributions from more than 160,000 employers. Our purpose as an industry fund, is to create value for our members and to provide them with confidence, financial security and dignity in retirement.

Suppliers are an integral part of our business, helping us become the market leader in a complex superannuation environment where our members are at the heart of everything we do. It is essential that suppliers share our values, principles and commitments and this Supplier Code of Conduct ("Supplier Code") sets out the minimum requirements for suppliers in seeking to do business with Cbus.

Cbus Values



Members are at the heart of everything we do



We act with **integrity** and **respect**



We lead by seeking **new ideas** and innovating to **continuously improve**



We are **accountable** for our own performance and as a **team**



We **collaborate** to achieve a better outcome

The principles outlined in this Supplier Code apply to all third party suppliers, employees of suppliers and contractors engaged to provide any goods and services required throughout

the supply chain, including merchandise for distribution to our members as procured by Cbus or any of its wholly or controlled sub-entities, irrespective of the geographical location of their operations (together “Suppliers”). Cbus may, where applicable, require other business partners to acknowledge and apply this Supplier Code.

Cbus is committed to building a culture where diversity is valued, our workplaces are free from discrimination, harassment, and bullying, and we comply with Australian law and important international standards such as the International Bill of Human Rights, the International Labour, Organization Declaration on Fundamental Principles and Rights at Work, and the United Nations Guiding Principles on Business and Human Rights. Cbus cares about people, respects human rights and requires all employees to treat others with trust, dignity, respect, fairness and equity. Suppliers are expected to show the same respect throughout the supply chain and Cbus prefer to work with Suppliers who share these commitments and values.

The provisions in this Supplier Code are in addition to, not in lieu of, the provisions of any legal contract or purchase order terms & conditions in place between Cbus and a supplier.

Cbus expect Suppliers to hold their supply chain to the standards contained within this Supplier Code.

BEHAVIOURS

LABOUR & HUMAN RIGHTS

Cbus expects Suppliers to:

- Comply with all applicable Australian and local laws and regulations including the Modern Slavery Act 2018
- Ensure all work is freely chosen without the use of Modern Slavery including forced or compulsory labour;
- Ensure workers are of legal age and prevent any form of child labour;
- Ensure bullying, harassment and discrimination, physical, sexual, psychological or verbal harassment or abuse is not tolerated within their organisation;
- Pay their workers lawful wages, including equal pay for equal work; and
- Provide fair working conditions for their employees, including adequate rest periods, sufficient leave, freedom of association and collective bargaining in accordance with relevant local laws.

DIVERSITY AND EQUAL OPPORTUNITY

Cbus expects Suppliers to promote a diverse and inclusive workplace free of discrimination on the following grounds including: gender, age, race, nationality or ethnic origin, disability, family responsibilities, marital status, medical or irrelevant criminal record, political views, pregnancy or potential pregnancy, religious beliefs or activity, sexuality or sexual orientation, union affiliation, physical appearance, social origin or carers' responsibilities. In line with this, Cbus prefers suppliers who promote diversity in their supply chain, including:

- Those with strong female gender representation, improve gender equality, actively promote women and, seek to address gender pay equity gaps;
- Those who publicly commit to Indigenous procurement targets or engage with social enterprises;
- Those that initiate procurement activities aimed at improving the lives of people with disability or who are disadvantaged

CORPORATE GOVERNANCE AND ETHICAL PRACTICES

Cbus's approach is to pursue the highest standards of conduct in its dealings and promotes good corporate governance and ethical behaviour and Suppliers must:

- Act at all times with integrity, transparency and honesty;
- Never engage in bribery or corruption, and comply with applicable anti-bribery and anti-corruption laws;
- Declare any actual or potential conflicts of interest in dealings with Cbus;
- Have a risk management framework, which incorporates business continuity plans
- Maintain accurate and auditable records and accounts
- Ensure any gifts, gratuities and hospitality offered or received are: reasonable, appropriate, not overly frequent and for legitimate business purposes only;
- Comply with applicable local, state, federal, international laws and regulations (including but not limited to sanctions, anti-money laundering and tax laws) in all locations where they operate and interact with Cbus;
- Strictly follow all relevant competition laws and promote fair behaviour towards other businesses and consumers;
- Comply with data privacy and regulatory requirements including the Privacy Act and CPS 234 when personal information is collected, stored, processed, transmitted, and shared;
- Respect Cbus confidential information and not disclose this, except as required by law or where authorised in writing by Cbus; and
- Ensure the protection of whistleblowers.

HEALTH & SAFETY

Workplace Health and Safety (which encompasses the provision of a safe, healthy and secure work environment to our employees, contractors, customers and visitors) is of paramount importance to Cbus.

Cbus favours Suppliers who share similar values and have a documented set of policies and programs aimed at promoting a safe, healthy and secure workplace and expects Suppliers to comply with the minimum requirements identified below. Suppliers must:

- Follow all relevant laws and regulations related to Workplace Health and Safety;
- Implement written health and safety policies and standards;
- Develop and implement documented systems to identify and record work-related injuries and illnesses;
- Be proactive in establishing programs or practices to improve the overall health and wellbeing of employees, customers and stakeholders such as the employees of contractors and suppliers, such as reducing the frequency and severity of personal injuries; and
- Adhere to Cbus's Workplace Health Safety Policy at Cbus sites, where applicable.

ENVIRONMENT & SUSTAINABILITY

Cbus aims to reduce the impact of its operations and that of the activities along its supply chain. Cbus will prefer Suppliers who act responsibly in managing the environmental impacts of their business operations. At a minimum, Suppliers are expected to:

- Comply with all relevant local and national laws and regulations on environmental management and reporting;
- Maintain a documented commitment to environmental objectives;
- Maintain a process aimed at tracking environmental performance over time and supporting environmental reporting and compliance with legislative requirements;
- Consider the design, development, manufacture, packaging and delivery of goods and/or services in terms of both their sustainability and long-term impact on the environment;
- Strive to reduce environmental harm by maximising the efficient use of natural resources, energy, water and raw materials and minimise pollution (inclusive of greenhouse gases pollution) and waste; and
- Comply with Cbus's environmental requirements (Available on request)

COMPLIANCE

The requirements outlined in this document are important to Cbus, and it is equally important that Suppliers recognise, accept and adhere to these requirements as part of their ongoing relationship with Cbus.

Cbus will continue to adopt and apply systems, practices and processes to monitor, assess and ensure Supplier's compliance with this Supplier Code, including seeking written confirmation from Suppliers of their acceptance and compliance.

Cbus may verify compliance with this Supplier Code through a variety of mechanisms which may include a self-evaluation tool for Suppliers, desktop-based audits or comprehensive on-site assessments led by Cbus or a nominated third party. Cbus may request Suppliers to submit documentary evidence to verify compliance.

If a Supplier finds it difficult to comply with the requirements in this Supplier Code, this should be reported and shared with a Cbus representative. Cbus aims to work with Suppliers to develop and implement corrective action plans where possible. However, serious breaches or continued non-compliance with this Supplier Code may lead to Cbus ceasing the purchase of goods or services from such Suppliers.

Suppliers are encouraged to go beyond compliance to applicable laws, and take responsibility to improve social and environmental conditions and ethical behaviour

RAISING CONCERNS

Where you have serious concerns about non-compliant behavior or breaches of this Supplier Code by Cbus employees or by a Supplier, contact the Cbus Hotline, details below.

If required and appropriate, Cbus, or a third party, will conduct an investigation, and may request the co-operation of the Supplier.

Whistleblower hotline contact details:

	1800 500 965 – 24hrs		02 9335 7466
	FairCall@kpmg.com.au		www.kpmgfaircall.kpmg.com.au/Cbus