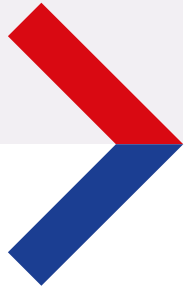


CFS Third Party Code of Conduct



Contents

Our Commitments	2
Guiding Principles	2
Expectations of Third Parties	2
How CFS works with Third Parties	3
Social Expectations	3
Policy governance	5

CFS Third Party Code of Conduct

The purpose of the CFS Third Party Code of Conduct (Code) is to share our approach on responsible procurement.

The Code outlines our commitments, the principles and expectations of Third Parties that provides goods or services to or on behalf of CFS, including sub-contractors. We expect Third Parties to comply with this Code.

Our Commitments

At CFS our purpose is to help our Members achieve their individual retirement goals. To achieve this our people commit to the highest ethical and professional standards, which include but are not limited to:

- Ensure our behaviours, decisions and actions align with the CFS Code of Conduct and Values (including a 'Should We?' test);
- Compliance with applicable laws and regulations;
- Acting responsibly and compliantly, doing the right thing, managing risk, and achieving the outcomes that serve our Members and Communities, People and Governance; and
- Managing our Third-Party relationships in an ethical, transparent and responsible manner.

Guiding Principles

CFS will apply the same fundamental principles, applied for Responsible Investment, to guide our decisions regarding Environmental, Social and Governance (ESG) risks and opportunities in our supply chain:

- **Integrity:** putting our Members, stakeholders and the community best interests at the heart of everything we do;
- **Balance:** listening carefully to all sides of the conversation to deepen our understanding;
- **Transparency:** incorporating ESG into decision making, understanding impacts, and being open about our progress on sustainable and responsible sourcing commitments; and
- **Focus:** promoting acceptance and the implementation of sustainable and responsible sourcing for our sourcing needs.

Expectations of Third Parties

CFS expects that our Third Parties:

- Conduct their business, compliant with applicable laws, rules, and regulations of the jurisdiction in which they operate and Australia;
- Review this Code and ensure compliance, inclusive of their supply chain and subcontractors;
- Self-monitor their compliance with this Code and to inform us of any non-compliance;
- Respond to any reasonable requests for information from CFS, ensuring all information is a true and accurate reflection of their operations and supply chain and acknowledge that CFS reserves the right to audit, verify, or otherwise assess the accuracy of such information at any time; and
- Remedy any non-compliance, as a priority, partnering with CFS in defining agreed corrective actions and timeframes to complete these actions.

How CFS works with Third Parties

We recognise that working with Third Parties while they address non-compliance with this Code within their own operations and by their own Third Parties may be a better long-term solution than ending the relationship. If a supplier is unable or unwilling to meet our minimum standards, we may choose to end the relationship subject to contractual obligations.

Third Parties have access to CFS' Stopline service, a trusted avenue to raise matters on conduct of concern relevant to CFS. Please refer to the CFS website [About us \(cfs.com.au\)](https://www.cfs.com.au)

There are options available for reporting via the Stopline service, including identifying yourself, remaining anonymous, or as a whistleblower.

If you have any questions or feedback on this Code, please contact [CFS Procurement](#).

Social Expectations

We expect Third Parties to comply with all applicable employment standards, labour, non-discrimination and human rights legislation. These, as a minimum, include:

Human Rights, Modern Slavery and Labour Practices

- **Modern Slavery:** Modern slavery can take many forms, including but not limited to forced labour, child labour, domestic servitude, sex trafficking and human trafficking. Third Parties will not use, or in any way benefit from or contribute to modern slavery and must actively support the abolishment of modern slavery by taking measures to identify, manage and mitigate modern slavery risks in their supply chain;
- **Child Labour:** Not employ or exploit children below the minimum legal age;
- **Freedom of Association:** Allow freedom of association and collective bargaining for workers; and
- **Workers Entitlements:** Provide fair pay and working conditions for employees.

Work Health and Safety (WHS)

Provide a safe and hygienic working environment through proactive management and controls that minimise health and safety risks, support accident prevention, with appropriate training to perform their jobs safely.

Respect and Diversity

We expect that Third Parties to CFS will, as a minimum:

- Not tolerate discrimination, harassment, violence, disrespect, inappropriate behaviour and have the appropriate policies in place to meet or exceed requirements of any relevant laws;
- Ensure the work environment and culture is inclusive with recruitment and employment practices based on an individual's ability and not based on gender, personal characteristics and physical appearance, medical condition, union membership or political affiliation; and
- Promote diversity and inclusion by providing equitable opportunities for diverse supplier groups within their supply chains.

Environment and Climate Risk Expectations

We expect that Third Parties to CFS will, as a minimum:

- Meet all relevant local and national environmental protection laws, regulations and standards;
- Seek to actively manage the adverse environmental impacts of their operations and across their value chain, and take responsibility for minimising the negative impact of their goods and services throughout their lifecycle;
- Maintain an environmental policy and management systems appropriate to size and nature of their operations, tracking and disclosing on performance; and
- Have suitable sustainable certifications related to the primary materials in their product.

Transparency and Governance

We expect, as a minimum, that our Third Parties:

- Demonstrate appropriate risk management and governance to comply with all local and national laws and regulations pertinent to their operations and supply chain;
- Implement procedures for their employees to comply with applicable anti-bribery and corruption laws including zero tolerances to corruption in any form;
- Neither the Third Party nor any of its subsidiaries, directors, officers, employees, agents or representatives is an individual or entity (each a Person) that is, or is owned or controlled, by a person that is the subject of any trade, economic or financial sanctions (Sanctions) administered or enforced by a relevant Sanctions authority;
- Provide CFS with such assistance as CFS reasonably requires in order for CFS to maintain and comply with its AML/CTF Program in connection with the good and services (where relevant);
- Maintain appropriate business continuity and disaster recovery arrangements to ensure they can continue to deliver goods or services to CFS with minimal disruption;
- Fulfill all contractual obligations including, but not limited to reporting customer complaints, managing incidents, notifications for breaches of Privacy, Data, Information Security, Legislation, and Continuous Improvement, Innovation and managing risks;
- Maintain a grievance mechanism or whistleblower policy or process that is clearly communicated and understood by employees, protecting employee whistleblowers and prohibiting retaliation or victimisation; and
- Ensure that employees complete mandatory training that at a minimum covers information security and handling, privacy and data protection.

Management Systems

CFS emphasises the importance of Third Parties having management systems that support the implementation of this Code.

We expect that Third Parties to CFS will:

- Have a member of their leadership team/ management review and accept this Code;
- Proactively work with their own supply chain to ensure the principles within this Code are met;
- Be able to give an account of where goods ordered by CFS are produced; and
- Inform CFS in writing, within 5 business days, of offboarding of any staff with access to CFS systems. This includes resignations, terminations, or periods of extended leave.

Policy governance

Approver

Executive Director, Procurement and Supplier Governance

Owner

Senior Manager, Procurement Operations

Review cycle

Biennial