



TPG Telecom Limited

Supplier Code of Conduct

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Public



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TPG Telecom Limited

Supplier Code of Conduct

At TPG Telecom Limited (ABN 76 096 304 620) (**TPG Telecom**), we are committed to conducting our business in an ethical, legal and socially responsible manner. We expect our Suppliers and all persons with whom TPG Telecom has commercial dealings to conduct their businesses and provide their products and services in accordance with the same principles, regardless of the type and value of business we do together.

The TPG Telecom Supplier Code of Conduct (the **Code**) sets out the minimum requirements and commitment expected of our Suppliers regarding compliance with laws, labour and human rights, business integrity, workplace health and safety, privacy, business continuity and environmental management.

Our goal is to only work with Suppliers who are fully compliant with the Code. To this end, TPG Telecom requires all Suppliers to review the Code and to formally commit to comply with it, as set out in section 2.1 of this document. Further, TPG Telecom expects its Suppliers to apply the Code to their supply chain who are engaged in the delivery of goods and services for TPG Telecom.

Suppliers may have contractual commitments that contain additional or more specific obligations in respect of the subject matter in this Code and in the case of any conflict that arises between an obligation contained in a contract and this terms of this Code, the contract will take precedence.

Supplier refers to any business, company, corporation, person or other entity that supplies goods or services to TPG Telecom and where relevant, includes all officers, employees, contractors, subcontractors and agents and other representatives of the Supplier.

TPG Telecom includes TPG Telecom and its subsidiaries.



1. OUR STANDARDS

1.1 Legal Compliance

1.1.1 Compliance with applicable international and local laws

TPG Telecom recognises that local customs, traditions and practices may differ from country to country, but at minimum we expect that our Suppliers comply with all applicable local and international laws, including (but not limited to) all anti-corruption, anti-fraud, anti-money laundering, anti-slavery, competition, economic sanctions, export control, environmental, health and safety, data protection and labour laws and that they will monitor compliance with such laws.

If Suppliers are providing TPG Telecom with equipment and services in Australia, TPG Telecom expects those Suppliers to comply with all applicable Australian laws. TPG Telecom also expects Suppliers to respect the fundamental conventions and labour standards of the International Labour Organization (ILO).

1.2 Labour and Human Rights

1.2.1 Human Rights

TPG Telecom expects its Suppliers to respect and support the protection of human rights in any dealings with stakeholders (i.e. employees, clients, suppliers, shareholders and communities) as set out in the Universal Declaration of Human Rights and the ten principles of the UN Global Compact.

1.2.2 Conflict Minerals

TPG Telecom is committed to avoiding the use of conflict minerals in our supply chain and therefore expects Suppliers to do the same. Conflict minerals are defined by the OECD as tin, tantalum, tungsten and gold mined from the Democratic Republic of Congo and adjoining countries.

1.2.3 Human trafficking, slavery, forced and compulsory labour

Suppliers must not use any form of human trafficking, slavery, servitude, forced, bonded, compulsory, indentured or involuntary labour. It is TPG Telecom's expectation that the employees of its Suppliers are able to voluntarily agree to the terms and conditions of their employment without coercion and can freely terminate their employment after reasonable notice.

Suppliers must not require workers to lodge deposits, money or papers with their employer as a condition of employment, unless required by applicable law. Suppliers must not retain workers' original identity documents.

Suppliers must not require workers to pay recruitment or any such other fees in relation to their employment.

1.2.4 Child and under age labour

Suppliers must not use child labour and must comply with all ILO Conventions in relation to the rights of the child and the elimination of child labour.

The minimum age for employment or work shall be the minimum age for employment or the age for completing compulsory education in that country, whichever is higher.



1.2.5 Equality, diversity and inclusion

Suppliers should promote diversity and inclusion.

1.2.6 Wages, working hours, employee wellbeing and development

Suppliers must comply with all applicable laws and regulations regarding wages and working hours, including the following:

- In accordance with ILO standards, workers will not be required to work more than the lesser of the legally permitted maximum number of hours a week or 60 hours a week (including 12 hours overtime) and will be allowed a minimum break of 24 consecutive hours every seven days.
- Workers will be paid in a timely manner and will be paid at least the minimum wage and compensated for overtime hours where required by applicable laws and regulations.
- Suppliers will not make deductions from wages as a means to discipline workers.

Where applicable, Suppliers should give consideration to promoting work/life balance, training, and the personal development of employees.

1.2.7 Respect for employees and dignity

Suppliers will treat employees with respect and dignity and will not use violence or threats of violence, verbal, physical or mental abuse, or other forms of harassment (including sexual harassment), threats or intimidation.

1.2.8 Freedom of association and collective bargaining

Suppliers must, in accordance with applicable laws and ILO Conventions respect and protect workers' rights. This includes, but is not limited to, freedom of association and the right to engage in collective bargaining.

1.2.9 Non-Discrimination and Harassment

Suppliers must not, and must ensure their hiring and employment practices do not, unlawfully discriminate against any worker, including on grounds of national origin, ethnicity, religion, race, disability, age, marital status, sexual orientation, gender, gender identity and expression, pregnancy (including potential pregnancy), family responsibilities, political or industrial activity, union membership, or any other status protected by law.

Suppliers are expected to maintain a work environment free from violence and that does not tolerate unlawful harassment.

1.3 Workplace Health and Safety

1.3.1 Safe and healthy work environment

Suppliers must, and must ensure that their subcontractors, provide a safe and healthy working environment for all employees, contractors and visitors in accordance with all applicable laws, regulations and industry standards. Suppliers and sub-contractors must be competent and hold the relevant qualifications and licences to perform activities.

Suppliers must comply with applicable workplace health and safety laws and ensure that adequate facilities, training and access to safety information are provided to their workers, contractors and visitors. Suppliers must ensure their workers understand and adhere to applicable health and safety



policies, procedures and guidelines.

1.3.2 Security and working on TPG Telecom sites

Suppliers must conduct their businesses in a secure manner with all reasonable measures for minimising TPG Telecom's exposure to security threats such as terrorism, crime, and pandemics.

Where a Supplier works on or visits TPG Telecom premises, or does any work for or on behalf of TPG Telecom, that Supplier must comply with TPG Telecom's health and safety and security requirements.

Upon becoming aware of any health and safety or security concerns when working with TPG Telecom, Suppliers must report their concerns promptly to TPG Telecom's Head of Health and Safety and Facilities or by email to donesafe@tpgtelecom.com.au.

1.4 Privacy

1.4.1 Data protection & privacy of personal information

Suppliers will protect personal information and TPG Telecom data and comply with all applicable privacy and data protection laws. Data privacy is of the highest priority and Suppliers must apply adequate data privacy and security protection to protect the personal information of TPG Telecom's customers and employees from unauthorised access, use and disclosure.

Suppliers who collect, use, store or have access to our customers' personal information must have adequate processes and procedures in place to monitor compliance with applicable privacy laws and contractual privacy obligations with TPG Telecom. Suppliers must comply with, and must not act (or fail to act) in any way that would cause TPG Telecom to contravene the privacy policies applicable to the services it provides to customers or the *Privacy Act 1988*.

1.4.2 Business Continuity

Suppliers will establish, maintain and review their Business Continuity strategies and plans in accordance with all laws, regulations and industry standards (e.g. ISO22301).

1.5 Business Integrity

1.5.1 Anti-Bribery, Anti- Corruption and Gifts

Suppliers must comply and conduct all business in a lawful and ethical manner, in all markets and jurisdictions in which they operate, and in accordance with applicable laws and regulations, including but not limited to the Australian *Criminal Code Act 1995*, the U.K. *Bribery Act 2010* and the U.S. *Foreign Corrupt Practices Act of 1977*

Each Supplier must act consistently with TPG Telecom's Anti-Bribery and Anti-Corruption Principles and implement adequate policies and procedures for its employees to comply with and to monitor compliance with the applicable laws.

Suppliers must not, directly or indirectly, engage in any form of corruption, including offering or accepting any bribes, furtive or unwarranted commissions, facilitation payments or illicit or other inappropriate benefits in order to improperly influence or gain an unfair business advantage.

Suppliers will not offer, promise or provide to any TPG Telecom employee a kickback, favour, gratuity, entertainment or anything of value to obtain favorable treatment from TPG Telecom. TPG



Telecom employees are similarly prohibited from soliciting such favours from Suppliers. This restriction extends to any family members and relatives of both the Supplier and TPG Telecom employees.

1.5.2 Unfair business practices

Suppliers will comply with all applicable competition laws and in particular not fix prices, rig bids, allocate customers or markets or exchange current, recent, or future pricing information with their competitors.

1.5.3 Conflicts of Interest

TPG Telecom requires its Suppliers to be free from any conflicts of interest. A conflict of interest describes any circumstance that could cast doubt on a Supplier's ability to act with total objectivity with regard to TPG Telecom's interests. Conflict of interest situations may arise in many ways. If a Supplier feels that it has an actual or potential conflict with TPG Telecom or any of its employees, the Supplier must disclose such conflict to TPG Telecom management or by email to compliance@tpgtelecom.com.au.

1.5.4 Confidentiality and Intellectual Property

Suppliers and their contractors and employees must maintain confidentiality with regard to all TPG Telecom confidential and business sensitive information they have access to, in accordance with their obligations under contract or applicable laws. Suppliers must protect all intellectual property belonging to TPG Telecom, our customers, other Suppliers and individuals and comply with any relevant licensing or other usage requirements.

1.5.5 Economic Sanctions and Trade Controls

Suppliers must comply with all economic, trade and financial sanctions laws and export and trade control laws and regulations in place in Australia, the United Kingdom, Hong Kong, the European Union, the United States, the United Nations and any other country with jurisdiction over TPG Telecom or the Supplier.

Suppliers must not take any action which may cause TPG Telecom to breach Sanctions and/or Trade Control Laws and must keep TPG Telecom apprised at all times of such information as it may need in order to comply with all Sanctions and/or Trade Control Laws.

1.6 Environmental Management

1.6.1 Comply with all applicable environmental laws

Each Supplier must comply with all applicable environmental laws and regulations such as waste management, carbon emissions and recycling. TPG Telecom expects Suppliers to provide visibility to environmental compliance.

1.6.2 Environmental impacts

Suppliers must be conscious of their impact on the environment and work to minimising negative environmental impact.

Suppliers will encourage the development and use of environmentally friendly technologies and practices and the reduction of negative environmental impacts throughout their supply chain.



2. COMPLIANCE

TPG Telecom expects its Suppliers to work with it based upon the compliance management principles set out below:

2.1 Supplier Standards of Conduct acceptance

Before a new Supplier is engaged or an existing Supplier is requested to provide further services or equipment to TPG Telecom, Suppliers must review the Code and formally commit to comply with the requirements in it and at no charge to TPG Telecom.

2.2 Supply information request and assessment

TPG Telecom may at any time audit a Supplier's compliance with the Code. TPG Telecom expects its Suppliers to provide it with reasonable access to all relevant information and documents and, if necessary, access to their premises (at agreed times and subject to reasonable conditions of access), so that we can assess performance of the Supplier and its subcontractors.

Suppliers must notify TPG Telecom as soon as practicable upon becoming aware of a breach of the Code. Suppliers must correct any breach of the Code promptly in consultation with TPG Telecom.

2.3 Enforcement

TPG Telecom takes compliance with the Code seriously and reserves the right to cease business relationships with a Supplier if satisfactory agreement cannot be reached in areas of risk, if the Supplier fails to comply with TPG Telecom's requests for information, or if it cannot meet the requirements set out in the Code.

2.4 Speak-up / Whistleblowing

If in the process of providing products or services to TPG Telecom, a Supplier observes or suspects any improper conduct in their dealings with TPG Telecom or by TPG Telecom employees or agents, the Supplier should report this to their TPG Telecom primary contact, or TPG Telecom's Whistleblowing Protection Officer (the WPO) at wpo@tpgtelecom.com.au. A copy of TPG Telecom's Whistleblowing policy is found at https://www.tpgtelecom.com.au/sites/default/files/PDF/TPG_Telecom_-_Whistleblower_Policy.pdf. Where a Supplier wishes to remain anonymous, they may contact TPG Telecom's external independent Whistleblower service using any of the following methods:

- calling the hotline number 1800 500 965*
- submitting a form via a secure online facility at <https://www.kpmgfaircall.kpmg.com.au/tpgtelecom>
- by post to The FairCall Manager, KPMG Forensic, PO Box H67, Australia Square, Sydney NSW 1213

* From overseas call the hotline number using tollfree methods (for example: WhatsApp, Skype, Viber, Google voice, Facebook Messenger).

TPG Telecom expects a Supplier to provide its workers, and those of its suppliers that are engaged in the delivery of goods and services for TPG Telecom, with an accessible and confidential means to report breaches of the Code to the Supplier's management or TPG Telecom without fear of reprisal.

Version	Version Effective Date
1.0	21 December 2020