



supplier code of conduct 2021



message from our chief risk officer

At nib, we are driven by our mission and vision of people enjoying better health. Through our success, we aspire for more prosperous and sustainable communities, not only the creation of enterprise value.

We recognise that how we go about our business across the nib Group, including the examples we set, directly and indirectly impacts the communities in which we operate and their own sustainability.

We're mindful of the downstream impacts of our procurement decisions, third-parties' labour conditions, as well as the need for our members and customers to have access to and choice of world class healthcare.

We've reinforced our commitment to operating sustainably across our supply chain through the development of our Supplier Code of Conduct (Code) which sets out the commitments and principles we expect of all our supply chain partners.

It is essential that when doing business with nib, our supply chain partners review this Code and ensure that their organisations and their supply chain act in accordance with this Code at all times.

Please read the code carefully. If you require further information, assistance, or are uncertain about the application of this Code, please contact nib's Procurement department by emailing procurement@nib.com.au

Roslyn Toms

Group Executive Legal & Chief Risk Officer



nib supplier code of conduct

Purpose of the Code of Conduct

This Code was developed to outline the minimum standards we expect from third parties to ensure the sustainability of nib's total end-to-end supply chain and its impact on the environment and society in which the total supply chain operates.

The purpose of this Code is to ensure nib's supply chain partners comply with internationally recognised principles on human rights, labour rights, the environment and anti-corruption and put in place management systems to identify and address adverse impacts on same principles.

Application of the Code of Conduct

This Code applies to all supply chain partners of nib, including business partners, vendors, contractors, and, importantly, the hospitals and healthcare providers that deliver services required by our members.

This Code applies to nib's suppliers' workers, irrespective of the nature of the contractual relationship – this means that it applies to workers who are engaged informally, on short-term contracts, and on a part time or casual basis.

Compliance with the Code of Conduct

It is essential you are familiar with this Code and always act in accordance with these rules. You should also encourage your own suppliers to adhere to the Code.

Beyond this Code, there is an expectation that all supply chain partners of nib abide by all laws, regulations, administrative practices and other standards as well as conduct their business in a manner that is of the highest ethical and moral standards in all dealings when producing goods or providing services for nib.

When there is a difference and/or a conflict between this Code and the local laws or standards, suppliers are expected to adhere to the higher requirement and immediately inform nib.

In case of non-compliance with this Code, nib will treat the matter seriously and in the first instance work with the supplier to focus on suppliers' capacity to remedy the non-compliance and demonstrate continuous improvement. Where a breach of this Code is on-going and a supplier does not remediate its conduct or performance within a reasonable time, nib will evaluate its options for ending the working relationship with the supplier.

Suppliers or partners that have any compliance related concerns are encouraged to contact nib's Legal or Compliance & Governance departments for advice by calling +61 2 4914 1100.

COMMITMENTS AND PRINCIPLES

Ethics

nib expects its suppliers to conduct their business in an ethical manner and to act with integrity.

Corruption and bribery

nib expects its suppliers to have a zero-tolerance policy toward any form of corruption, bribery, kickback, extortion, embezzlement and facilitation payments.

Gifts, entertainment and hospitality

Suppliers are expected to keep any business gift, entertaining or hospitality reasonable and only for the purpose of maintaining good business relations.

Reporting mechanisms

nib's suppliers are expected to have policies and processes to address ethical issues so that employees and other parties as relevant can raise compliance concerns in a confidential way and without fear of retaliation.

Labour and human rights

nib's suppliers are expected to respect universally recognised principles on human rights and labour rights including but not limited to the United Nations Global Compact's ten principles, the United Nations Universal Declaration of Human Rights and the International Labour Organisation Core Conventions.

Modern Slavery

Human rights abuses are not permitted in any form in our supply chain. Suppliers must not commit or be involved in the committing of any human rights abuses, including forced or involuntary labour, human trafficking, discrimination, sexual exploitation or other exploitative practices.

Suppliers must ensure they do not employ, directly or indirectly, workers under the local legal age of employment. If the local legislation is silent on the minimum age for employment, 15 years old is the minimum age for the purpose of this Code.

Workers under the age of 18 shall only perform work in accordance with legal requirements such as working hours, wages and working conditions) and subject to any requirement requiring education and training.



Working Conditions

nib's suppliers are expected to ensure that all work is freely chosen and provides fair remuneration, working hours and work conditions for all workers.

Suppliers must not require workers to provide money as a condition of their employment, and workers must be allowed to maintain control of their identification documents.

Freedom of Association

Suppliers are expected to respect their employees' right to associate with an organisation in accordance with local legislation and recognise their right to collective bargaining.

Discrimination and Harassment

Suppliers must ensure there are no forms of discrimination in respect of employment and occupation in its business, or the supplier's own supply chain. Harassment, verbal or physical, should not be tolerated in the suppliers' workplace.

Health and Safety

We work with suppliers who are committed to providing a safe and healthy work environment to all of their workers, customers and site visitors.

nib expects suppliers to:

- Ensure the wellbeing of employees and all other people that enter the supplier's premises.
- Develop, communicate, implement and maintain policies and systems for work health and safety that are consistent with recognised standards.

Member Empowerment and Welfare (Service Providers – Hospital and Ancillary)

In an effort to contribute towards making healthcare systems in which we operate more accessible, affordable and cost effective, we work with suppliers who:

- Empower our members to make more informed decisions about their health and healthcare choices with transparency, systems and data;
- Provide our members with information in plain language;
- Inform our members what the Providers' processes are for resolving any concerns that they may have; and
- Ensure that all information that passes between our members, the nib Group and nib Group's Providers is protected in accordance with nib's privacy and confidentiality policies.

Community

Strong community spirit, cohesion and harmony are good for the psychological and physical wellbeing of communities. We believe essential to that is a strong sense of identification with the community, social justice, tolerance and respect for our differences. nib aims to work with suppliers who are invested in making a positive contribution to the communities where they operate.

Natural Environment

The quality of the natural environments in which we live are influential on people's health. Clean air and water, biodiversity and climate stability are all fundamental elements we seek to embellish. We have a particular interest in neutralising our carbon footprint given its known impact upon global warming. nib expects suppliers to:

- Comply with all relevant environmental laws, regulations and standards. Where such laws do not adequately protect the environment, we expect standards will developed by suppliers to minimise any adverse environmental impacts resulting from their operations, products and services;
- Promote a culture that values the environment and acts to protect the environment in which they operate;
- Prevent, reduce, re-use, recycle, recover and/ or dispose of waste in an environmentally sustainable way;
- Efficiently use water and implement water resource management plan; and
- Efficiently use energy and identify, monitor and minimise greenhouse gas (GHG) emissions.

GOVERNANCE & MANAGEMENT SYSTEMS

The importance of having the highest standards or ethical practice and good governance in business and public institutions is increasingly evident. The risks associated with our business operations and the potential consequences for communities and all stakeholders of failing to manage these is well understood by us.

We're especially aware of how the behaviour of companies like ours can influence others operating in our communities. nib expects its suppliers to:

- comply with all laws that apply to the jurisdiction of the supplier, as well as comply with regulations and compliance obligations that relate to their operations regarding all products and services they provide to nib;
- maintain conflict of interest policies and procedures and notify nib of any actual or potential conflicts of interest that may arise;



- provide processes and procedures to assist their employees in complying with anti-bribery and corruption laws;
- respect the privacy of employees and customers and complying with all laws in the collection, use and protection of personal information;
- actively manage risks within the supplier's business and bring any risks related to products and services they provide to nib's attention in a timely manner;
- cooperate with reasonable auditing processes that are conducted or commissioned by nib in connection with this Code;
- provide training to their employees to empower them to understand the content of this Code and appropriately implement it principles;
- continuously improve performance against this Code; and
- upon reasonable request, make available to nib any compliance or performance data report regarding the supplier's business with nib Group, in reference to the supplier's compliance with any aspect of this Code.

Reporting a breach

At nib we're committed to ensuring that we observe the highest ethical standards of behaviour, honesty and integrity in all our business activities.

Suppliers or partners that have any questions or concerns regarding this Code are encouraged to contact nib's Procurement department by emailing procurement@nib.com.au

Our Whistleblower Policy has been put in place to ensure Disclosers can raise concerns regarding any misconduct or improper state of affairs or circumstances (including unethical, illegal, corrupt or other inappropriate conduct) without being subject to victimisation, harassment or discriminatory treatment.

For more information on nib's Whistleblower Policy and services, please <u>click here</u>.