

ACSI Supplier Code of Conduct

October 2025

Introduction

The Australian Council of Superannuation Investors (ACSI) is committed to ethical, sustainable, and socially responsible behavior and holds the listed companies with which we interact to the same high standards. Naturally, we therefore expect the same of our suppliers.

Our Supplier Code of Conduct (Code) describes the minimum expectations in the areas of integrity, ethics and conduct, conflict of interest, corporate governance, diversity, labour and human rights, health and safety, and environmental management.

Suppliers to ACSI, including employees of suppliers and contractors engaged to provide any goods and services required throughout the supply chain (together referred to as "suppliers"), are advised to review the Code and ensure that relevant areas of their business and supply chain meet our standards.

ACSI may take a range of remedial actions with suppliers who fall short of these expectations as per our contractual arrangements on a case-by-case basis.

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

1. Integrity, ethics and conduct

ACSI expects high standards of ethical conduct which is not just limited to compliance with all applicable laws. Suppliers are expected to be ethical in their business activities, including relationships, practices, sourcing and operations.

Business integrity

Suppliers are expected to comply with all anti-bribery, anti-corruption and anti-money laundering laws. Suppliers must not engage in, either directly or indirectly, fraudulent, corrupt or collusive activities.

Record keeping and documentation

Suppliers are expected to maintain adequate records that accurately record all financial transactions and information in accordance with applicable laws, policies and procedures.

Professional conduct

Suppliers are expected to conduct themselves in a manner that is fair, professional and that will not bring ACSI into disrepute.

Confidentiality

Suppliers must not improperly use any private, confidential or commercially sensitive information in its possession relating to or in connection with its dealings with ACSI. Suppliers are also expected to comply with data privacy and regulatory requirements including the Privacy Act when personal information is collected, stored, processed, transmitted, and shared.

2. Conflict of interest

ACSI believes that all business activities should be undertaken with impartiality and any conflict of interest should be raised and managed.

Suppliers must:

- a. declare to ACSI any situation that raises an actual, potential or perceived conflict of interest related to or in connection with its dealings with ACSI.
- b. avoid financial, business or other relationships which may compromise the performance of their duties under their business arrangement with ACSI. Any conflicts of interest that cannot be avoided are expected to be declared and managed appropriately.

3. Corporate governance

Commitment to sound corporate governance and management, risk and corrective action systems, are key to a reliable supply chain for ACSI. Suppliers are expected to maintain sound processes.

Suppliers should develop and maintain a process to identify, manage and control relevant risks associated with its operations. Suppliers are best placed to assess their own key areas of risk but could include areas like audit, financial controls and the structure and composition of governing bodies, business ethics, corporate culture and relevant systemic risks like climate change.

4. Diversity

Suppliers should have a diverse workforce to support the quality of their business and their product or service. In this context, diversity includes but is not limited to gender, age, ability and education, family status, sexual orientation, religion, and ethnic or national origin. The supplier's workforce includes its governing and decision-making bodies.

Suppliers should have mechanisms in place to ensure, and where deficient, improve the diversity of its workforce.

The governing bodies of suppliers should have representation from at least 40% women and 40% men. Where this is not the case, they should disclose a plan appropriate to their business to achieve that diversity.

5. Labour and human rights

ACSI believes that all workers in its supply chain deserve to be treated with dignity and respect. Suppliers are expected to provide a fair and ethical workplace, which upholds high standards of human rights and integrates appropriate labour and human rights policies and practices into its business.

We expect suppliers to act against human rights exploitations and make all reasonable efforts to actively consider modern slavery risks in their operations and supply chains and work with ACSI to consistently develop capacity to identify, manage, address and remediate modern slavery risks.

Anti-discrimination

Subject to applicable laws, suppliers are expected not to discriminate against any worker based on age, disability, ethnicity, gender, marital status, political affiliation, race, religion, sexual orientation, gender identity, union membership, or any other status protected by law, in hiring and other employment practices.

Anti-harassment

Suppliers are expected to commit to a workplace free from workplace bullying, harassment, victimisation and abuse.

Suppliers are expected not to bully workers or threaten workers with, or subject them to, unlawful or inhumane treatment. This includes, but is not limited to, abuse and harassment which can be verbal, physical, sexual or psychological.

Human rights

Suppliers are expected to provide goods and services in a manner consistent with any applicable human rights obligations.

Prevention of involuntary and underage labour

Suppliers are expected to:

- a. ensure that all work is undertaken without coercion
- b. not use any form of forced, bonded or indentured labour
- c. employ only workers who are the applicable minimum legal age.

All use of temporary and outsourced labour should be ethical and within legal requirements.

Suppliers are therefore expected to:

- a) use all reasonable endeavours to ensure that the third-party recruitment agencies it uses are compliant with the provisions of this Code and applicable law
- b) be responsible for payment of all recruitment-related fees and expenses in recruiting contract workers either directly or through third party agencies.

Working hours, wages and benefits

Suppliers must:

- a) follow all applicable laws and regulations with respect to wages, working hours and workers compensation insurance
- b) ensure that all workers receive their legally mandated minimum wages, benefits, superannuation, leave entitlements and time off for legally recognised holidays
- c) pay workers' wages as required under applicable laws in a timely manner and not be expected to use wage deductions as a disciplinary measure. All overtime is expected to be reasonable and paid at the rate and in accordance with the applicable laws.

6. Health and safety

Suppliers are expected to provide a healthy and safe work environment and integrate sound health and safety management practices into its business.

Suppliers must comply with all applicable laws relating to workplace health and safety. Suppliers are expected to:

- a. manage occupational health and safety hazards
- b. provide workers with job-related training and consult with employees in relation to the provision of information and training
- c. have written health and safety policies and standards
- d. develop and implement systems to identify and record work related injuries and illnesses.

7. Environmental management

Suppliers are expected to minimise the environmental impact of their operations and maintain environmentally responsible policies and practices.

Suppliers must comply with all applicable laws and regulations relating to the environment, including any management and reporting obligations. Where relevant, suppliers are expected to manage the environmental impact of their operations by:

- a. ensuring the safe storage, transportation and disposal of hazardous substances including hazardous waste
- b. maintaining policies and practices for the efficient use of energy, water and natural resource consumption
- c. maintaining policies and practices that reduce the risk of pollution, loss of biodiversity, deforestation, damage to ecosystems and greenhouse gas emissions.

8. Compliance

The provisions of this Code are important to ACSI, and it is equally important that Suppliers recognise, accept and adhere to these requirements as part of their ongoing relationship with ACSI.

ACSI will continue to adopt processes to ensure Supplier's comply with the provisions of this Code, including the adoption of clauses within Supplier agreements or written confirmation from Suppliers of their acceptance and compliance with this Code. Suppliers may be requested to provide evidence, participate in assessments or respond to inquiries to support their compliance with this Code.

We encourage Suppliers who are unsure or are unable to comply with the provisions of this Code to contact a member of the ACSI team. ACSI can work with you to educate and/or support you identify and remediate any matters in relation to this Code.

9. Raising concerns

Where you have serious concerns about actual or potential breaches of this Code by ACSI employees or by a Supplier, please contact one of the following Whistleblower contacts:

- CEO on 03 8677 3895; or
- CFO/COO on 61 409 417 483.

If your issue relates to ACSI Management or you believe that appropriate action has not been taken, please contact the Chair of our Finance Risk and Audit Committee on:

- ACSIconduct@acsi.org.au

If required and appropriate, ACSI, or a third party, will conduct an investigation, and may request cooperation of the Supplier.

The Supplier must provide timely, complete and accurate information upon request.