

# Supplier Code of Conduct



This Supplier Code of Conduct communicates MLC Life Insurance’s expectations of our suppliers and their supply chains in providing goods and services to our business.

Sustainable supply chain management represents an opportunity for us to deliver positive social, environmental, governance and economic impacts through our procurement practices. We view sustainable practice as a responsibility that extends to all suppliers of MLC Life Insurance and seek to engage with suppliers so that they acknowledge this responsibility and take appropriate action to comply with this Code. Suppliers are expected to self-monitor their compliance with this Code and your MLC Life Insurance Partner Manager may request evidence of compliance.

## General expectations of suppliers

MLC Life Insurance expects that all suppliers will comply with the commitments and values listed in this Code. We expect our suppliers to work with us to meet their obligations. In the event a supplier is unable to comply with the expectations set out in this Code, the supplier should contact their MLC Life Insurance Partner Manager to address these concerns.

MLC Life Insurance expects all suppliers will comply with all applicable laws and regulations and promptly respond to any breaches.

## About us

At MLC Life Insurance, we truly have a noble intent, communicated through our Purpose, ‘A promise for life’. We provide over 1.3 million Australians with reinsurance that they and their loved ones will be supported when they need it most.

MLC Life Insurance is committed to helping our customers and communities thrive in life and health. To deliver on our commitment, we seek to build relationships with chosen suppliers who operate in a fair, ethical and responsible manner.

We believe these behaviours form the foundations of sustainable practice in business. By integrating sustainable practice into our procurement process we can generate positive opportunities and manage risks for sustainable social, environmental and economic development. We will seek to continuously improve our procurement practices, with the objective of identifying, mitigating and eliminating risk, so as to deliver sustainable life insurance to our customers and partners.

## Application and scope

This Code applies to all suppliers who provide products or services to MLC Life Insurance and is incorporated by reference in the contract documents for each supplier. The application of this Code does not extend to MLC Life Insurance’s group and retail insurance partners, or debt protection partners who are governed by separate arrangements.

MLC Life Insurance reserves the right to update this Code as required. It also applies to MLC Life Insurance’s supplier selection process. The Code operates alongside and is subject to existing laws and regulations and in no way limits suppliers’ rights and obligations under such laws and regulations, in Australia or abroad.

## Labour Rights

### Protections for employees

MLC Life Insurance expects that responsible employment and workforce practices are applied consistently across an organisation's operations. Suppliers must ensure any applicable local and national laws are recognised and applied, including in relation to employment practices, human rights, anti-discrimination, health and safety and modern slavery. In respect of their own operations as well as those forming their supply chain, we expect our suppliers to:

- Ensure reasonable steps are taken to facilitate a fair and equitable working environment free from any form of harassment or discrimination based on, but not limited to, age, race or ethnic origin, disability, gender, nationality, marital or relationship status, sex, sexual orientation, gender identity, pregnancy, family or carer responsibilities, political or union affiliation.
- Ensure all employees are legally entitled to work and that no form of modern slavery is used including human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage or the worst forms of child labour. In the event a supplier becomes aware that the above has occurred, the supplier must notify their MLC Life Insurance Partner Manager.
- Ensure compliance with minimum wage payments and maximum working hours. In the event there is no legislation or other requirements governing these matters, ensure wages and hours correspond with experience and industry standards.
- Ensure employees are provided with freedom of association and, where supported by relevant legislation, the right to collectively bargain. Where no such legislation exists locally, appropriate channels should be made available to employees for discussion and recourse on employment related issues.

## Information Security

### Information Security and Data Privacy

MLC Life Insurance is committed to maintaining the security of our customer's data. We expect our suppliers, where applicable, to comply with all applicable data protection laws, obligations and contractual requirements to keep our data secure from unauthorised access and use.

Our suppliers must:

- Contractually agree to adhere to information security standards equivalent to MLC Life Insurance's, which may include annual security assessments;
- Promptly notify MLC Life Insurance within 72 hours of a data breach, cyber incident, unauthorised disclosure or within 10 days of a known security control weakness/failure in accordance with the terms of their contract; and
- Notify MLC Life Insurance if any information (including backups) is to be stored offshore or is accessible by offshore entities, including by providers and partners.

## Responsible Practices

### Human Rights and Modern Slavery

MLC Life Insurance recognises that human rights are universal and fundamental rights that preserve the inherent freedom, dignity and equality of all human beings.

Our suppliers must respect the International Bill of Human Rights and other international standards. Suppliers must take action to identify, manage and eliminate modern slavery practices from their operations and supply chains.

### Workplace Safety & Wellbeing

MLC Life Insurance expects our suppliers to share our commitment to wellbeing and safety. This includes working in ways which minimise and reduce the impacts to health while actively promoting wellbeing for all employees and others who could be affected by their activities.

### Inclusion & Diversity

MLC Life Insurance strives to be a leader in, and advocate for, workplace diversity and inclusion. We seek to integrate diversity and inclusion into the way we work, and we expect our suppliers to do the same. We engage with suppliers who will promote and actively support these values in their own workplace and supply chain.

### Supply Chain Diversity

MLC Life Insurance seeks to engage a diverse supplier base including indigenous-owned businesses, women-owned businesses, disability enterprises and social enterprises. We encourage our suppliers to share this commitment in their own supply chains.

### Environmental

MLC Life Insurance requires our suppliers to adhere to relevant laws, regulations and standards relating to environmental protections. MLC Life Insurance expects that our suppliers will actively manage the environmental impact of their operations, ensuring their conduct minimises environmental impact and demonstrates a commitment to environmental sustainability.

## Corporate Governance

MLC Life Insurance recognises corporate governance to be about promoting fairness by setting out responsibilities of our board, shareholders, employees and suppliers. A robust corporate governance structure is critical for mitigating sustainability impacts to our organisation.

## Economic & Trade Sanctions

We expect our suppliers to ensure that their activities comply with sanctions regimes implemented under Australian sanctions law which currently include Australia's Autonomous Sanctions Regime and the United Nations Security Council ("UNSC") Sanctions Regime. Our suppliers must ensure that their activities do not involve (either directly or indirectly) a prescribed sanctioned person, entity or country under either regime.

## Conflicts of Interest

We expect our suppliers, their employees and related parties to avoid any situation which could create, has the potential to create, or could be perceived to create an incentive for that individual or party to act in a way that is not in the best interests of MLC Life Insurance, its customers or shareholders.

If a supplier considers that an actual, potential or perceived conflict of interest may exist, it must immediately disclose the matter to MLC Life Insurance through your relationship manager and document how the conflict will be appropriately controlled or avoided. MLC Life Insurance will assess the conflict, form a view on how the conflict should be managed and communicate this to the supplier.

## Bribery & Corruption

MLC Life Insurance has zero tolerance for bribery, corruption or any criminal and unethical behaviour, irrespective of jurisdiction. We expect our suppliers, their employees and related parties to comply with all applicable international, commonwealth and state-based laws and regulations in relation to anti-bribery and anti-corruption.

Bribes, kick-backs, pay-offs, secret commissions and any like payments (including facilitation payments) are strictly prohibited. Suppliers must not engage in any behaviour that may be perceived as avoiding or by-passing anti-bribery and anti-corruption laws.

## Reporting breaches or suspected breaches of this Code

MLC Life Insurance expects suppliers to notify either their relationship manager or the MLC Life Insurance Confidential Alert Line of any instances of non-compliance or suspected breaches of this Code.

Where a notification is made through the relationship manager, the relationship manager will liaise with the supplier to understand the nature of the breach and use best commercial efforts to work towards achieving an acceptable remediation.

Suppliers wishing to make a notification through the MLC Life Insurance Confidential Alert Line may do so using the details below:

- 1800 956 543
- Whistleblower\_Line@mlcinsurance.com.au

MLC Limited uses the MLC brand under licence from the Insignia Financial Group. MLC Limited is part of the Nippon Life Insurance Group and is not a part of the Insignia Financial Group.

## Efficient invoicing and payment

MLC Life Insurance seeks to support efficient invoicing and payment for our suppliers. To do this, we expect our suppliers to issue invoices within the timelines agreed, to ensure the content of invoices is true and correct, including Purchase Order number, and to respond to any queries raised by MLC Life Insurance as quickly as possible.

---

### For more information

If you would like further information, or to provide feedback, please contact [procurement@mlcinsurance.com.au](mailto:procurement@mlcinsurance.com.au)

---