

BENDIGO AND ADELAIDE BANK LIMITED

Supplier Code of Conduct

Acknowledgement of Country

We respectfully acknowledge the Traditional Owners of lands across Australia and pay our respects to their Elders, past and present. Our head office in Bendigo, Victoria is located on Dja Dja Wurrung land.

About Bendigo and Adelaide Bank Limited

We have a long and proud history. For more than 160 years, We have actively listened and responded to the needs of Our customers and their communities. Over this period, more than 80 different organisations have come together to become the organisation that We are today – an Australian owned, top 100 ASX listed company and with more than 110,000 shareholders.

Our vision is to be Australia's bank of choice, driven by Our purpose to feed into the prosperity of Our customers and communities. This purpose underpins everything We stand for and the action We take. We believe Our success is driven by helping Our customers, and the communities in which they operate, to be successful. Through Our Community Bank model, We work with Community Bank companies across Australia to provide banking services, while sharing in the profit with the local communities.

We have assets under management of more than \$76.2 billion and market capitalisation of around \$5.7 billion. We are Australia's better big bank, with more than 7,000 staff helping more than 2.1 million customers to achieve their financial goals. Our principal activities are the provision of banking and other financial services including lending, deposit taking, leasing finance, superannuation and funds management, insurance, treasury, and foreign exchange services (including trade finance), and trustee services.

We source goods and services from over 2,000 Suppliers, with an annual procurement spend of close to \$700 million. Our Suppliers are a critical part of our success, and we diligently select and retain Suppliers who share similar values to Ours.

DOING BUSINESS WITH BENDIGO AND ADELAIDE BANK LIMITED

Supplier in this document means any person, business or entity that provides products and/or services to Bendigo and Adelaide Bank.

In this supplier Code of Conduct, Bendigo and Adelaide Bank, "We", "Us", "Our" or "Ours" refers to Bendigo and Adelaide Bank Limited ABN 11 068 049178 and any affiliate entity within the Bendigo and Adelaide Group of companies.

We expect all Suppliers to operate in a manner that meets or exceeds Our minimum requirements as set out in this document. When circumstances dictate, Our contracts may have more stringent requirements which set the expectations for a specific relationship.

Minimum requirements

OUR APPROACH

We carefully select Our Suppliers, as Suppliers can directly impact Our business and reputation in the wider community.

We expect Suppliers to comply with all applicable national and international laws, regulations, standards, and codes of practice. This expectation includes the Supplier's ethical, environmental and social conduct in the course of operating its business.

We expect Suppliers to make available to Us, upon reasonable request, and in the required format any compliance or performance data reporting regarding the Supplier's business with Us, in reference to the Supplier's compliance with any aspect of this Code.

If a Supplier is unable to demonstrate compliance with the Code or fails to meet minimum requirements, We may pursue appropriate action, including remediation or termination of the business relationship with the Supplier, as set out in Our contract with the Supplier.

Existing and potential Suppliers who can demonstrate compliance with the Code will be considered for inclusion in Our procurement activities. Where relevant, requests for goods and services will reference this Code as part of their selection criteria.

ETHICAL CORPORATE GOVERNANCE

Our approach to corporate governance is drawn from Our vision, strategy, values, and purpose. We are committed to high standards of corporate governance – both in Our framework and in Our policies and practices.

Acting with integrity in the conduct of Our business is an important element of Our success. We publish Our Corporate Governance Statement annually (available on Our Investor Centre) which outlines Our approach to corporate governance.

Our Approach

- Our minimum requirements are informed by applicable laws, international and industry standards, business needs and stakeholder expectations;
- We assess all new and existing Suppliers' compliance with this Code on an ongoing basis, to drive continuous improvement along Our supply chain; and
- We will consider a Supplier's performance in accordance with this Code when making sourcing decisions and in managing Our relationships with Suppliers.

Suppliers must ensure ethical business practice and corporate governance by:

- conducting their business in an ethical, fair and professional manner, free of bias, unfair advantage or any other type of conduct which may cause financial or reputational loss;
- complying with all laws, regulations, standards, and best industry practices relating to anti-bribery, anti-corruption and fraud; and;
- adhering to acceptable business practices in their own Supplier arrangements, including the provision of timely payment and reasonable contractual conditions.

Risk management

We manage risk by understanding, disclosing, and managing risks in Our supply chain, including environmental and social risks. This includes a focus on climate related risks and the potential for modern slavery within Our supply chain.

Where these risks are present, We expect Suppliers to ensure suitable risk management by:

- having a risk management framework which incorporates social, ethical, safety and environmental risks into their risk management processes; and
- having a business continuity plan to minimise business impacts in the event of any major disruption or event that would cause supply chain issues, including, but not limited to, those associated with the climate-related physical and transition risks.

Environmental performance

We are committed to climate change action.

We have made public commitments through Our [Climate Change Policy Statement](#) and Action Plan to:

- Reduce the carbon and environmental footprint of Our own operations;
- Support Our customers and communities by taking actions required to mitigate, adapt and respond to climate change;
- Optimise Our climate change risk governance and risk management framework; and
- Disclose Our climate-related performance.

Where the potential to impact Our environmental performance is present, We expect Suppliers to ensure good environmental performance by:

- establishing and maintaining internal frameworks regarding the environmental impact of the Supplier's business and management of such impact;
- disclosing, where requested by Us, the carbon and environmental footprint associated with delivering products or services and actively working to reduce this footprint, for example by installing and/or procuring renewable electricity, incorporating recycled materials, and sustainably managing water use, and;
- complying with all relevant laws, regulations, standards, internal frameworks, and best industry practices as they relate to the environmental impact of the Supplier's business.

Human rights and Supplier's employees, contractors, and subcontractors

We are committed to human rights and fair employment and engagement practices. These practices are in accordance with the UN Universal Declaration of Human Rights and the core conventions of the International Labour Organisation. We strive to reduce the risk of slavery or human trafficking within Our supply chain and Our operations as required by the Modern Slavery Act 2018 (Cth).

We expect Suppliers to engage and manage their people ethically and must comply with all laws, regulations, and standards in relation to:

- anti-discrimination, which prohibits discrimination in hiring, compensation, access to training, promotion, termination, or retirement based on race, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation;
- the engagement of its own personnel and any contractor;
- provision of employment benefits.;
- employment conditions and compensation.
- equal opportunity in the workplace, fair treatment and anti-discrimination in the workplace (including actions to strive towards gender equality, LGBTI inclusion, cultural diversity, accessibility for people with disability and inclusion of Indigenous peoples);
- workplace health and safety;
- whistleblowing; and
- human rights, not engaging in or being associated with any form of human trafficking, debt bondage, forced labour or child labour as defined by the Modern Slavery Act.

We expect Suppliers to also ensure that:

- there is no sub-contracting except as approved by Us, and
- there are adequate processes in place for properly managing approved subcontracting to ensure subcontractors comply with applicable laws and do not abuse, exploit, or provide unsafe working conditions for their employees or workers.

Compliance and governance

We expect any new Supplier to acknowledge this Code of Conduct as part of the onboarding process.

Suppliers should inform Us if they are unable to meet this Code and We may endeavour to work alongside and collaborate with them to improve their ability to meet these requirements.

Questions

This Code cannot set out every situation Our Suppliers may encounter and there will be times when Our Suppliers need to be the judge of what is the right thing to do. In these instances, We encourage Suppliers to openly talk about the issue or situation with Us. For more information about Our codes and policies, please reference the Bendigo and Adelaide Bank website. Any questions or feedback regarding this Code should be referred to your Bendigo and Adelaide Bank business contact, in the first instance.

Reportable conduct

Should Our Suppliers, people working along Our supply chain and related parties become aware of misconduct, or improper state of affairs or circumstances, such as illegality or fraud, they can report it anonymously by using Our Whistleblower Service:

Online: <https://australia.deloitte-halo.com/whistleblower/website/BendigoandAdelaideBank>

Phone: 1800 223 150

Email: speakingup@deloitte.com.au

Reply Paid Post: BEN Whistleblower Service, Reply Paid 12628. Victoria 8006



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