

Supplier Code of Practice

2020

Introduction

Suppliers play an important role in helping the AMP group achieve its business objectives and meet community expectations. Suppliers and their employees or contractors need to adhere to values that are consistent with AMP's own policies and standards. The purpose of this Supplier Code of Practice is to communicate AMP's policies and standards as they relate to our dealings with suppliers.

Application and scope

This Code applies to AMP entities that provide services to other AMP entities and external suppliers. The principles this Code apply in addition to specific obligations set out in the contract documents for each supplier, which have been negotiated to address risks and requirements specific to each arrangement. If there is any inconsistency between the terms of the relevant contract and this Code, the terms of the contract prevail to the extent of the inconsistency.

AMP typically updates this Code annually to incorporate new regulations and legislative changes, as well as ongoing continuous improvement.

Governance

General expectations of suppliers

AMP expects that, in delivering the goods and services required by AMP, suppliers will comply with the principles and values set out in this document. These include an expectation that all AMP suppliers will:

- Meet their contractual obligations to us and their own suppliers;
- Comply with all applicable laws and regulations in relevant jurisdictions and promptly respond to any breaches;
- Manage their risk, governance and compliance appropriately, with senior management responsibility and accountability for legal compliance;
- Encourage the principles outlined in this Code in their own workplace and ensure supporting practices become standard business practice;
- Influence their own supply chain and related third parties to adopt and to demonstrate commitment to these or similar principles;
- Share these principles with all employees involved in providing services to AMP, including training and guidance if required; and

- Verify compliance on request, through self-assessment, by providing supporting information and evidence and facilitating site visits or audits.

In the event that a supplier is unable to comply with any of the expectations in this document (eg due to a conflict with any current or future regulations), the supplier should contact AMP immediately and work with us to address the conflict.

Ethical business practices

AMP expects suppliers to:

- Act professionally with honesty and integrity;
- Respect and value differences and create a safe working environment;
- Raise concerns as and when they arise;
- Avoid conflicts of interest that are likely to be detrimental to AMP and avoid those that cannot be adequately managed through internal controls and/or appropriate disclosure;
- Respect and maintain privacy and confidentiality;
- Comply with legal and regulatory obligations; this Code of Practice and its referenced policies; and
- Not receive, offer or give bribes, kickbacks or make facilitation payments, nor gifts, hospitality, expenses or benefits that might appear to create an obligation, affect impartiality, or inappropriately affect a business decision.

Information security

AMP is required by regulations to ensure that its 'information assets' (systems, data and other technology facilities) are protected by appropriate information security controls, including AMP information held or used by suppliers.

AMP expects suppliers to:

- Where required, implement and maintain appropriate technical and organisational measures to protect the confidentiality, integrity and availability of AMP data, including any personal data;
- Where required, only process personal data as instructed by AMP, unless required by law. Processing includes any

collection, use, disclosure, storage or the deletion/archiving of personal data; and

- Notify AMP immediately of any material information security incident or control failure impacting their systems or issues or complaints relating to AMP data.

Record Retention

AMP is required by law and industry codes to retain certain Records for a particular length of time. These requirements extend to suppliers that may hold records on behalf of AMP. AMP expects suppliers to:

- Where required, maintain records during their active use and retain thereafter for the minimum period stated in any applicable legislation, regulation or industry code or as required for commercial or legal reasons; and
- Ensure Records are securely destroyed when they are no longer required by AMP or for regulatory reasons.

Business continuity management

AMP expects suppliers to have appropriate and effective Business Continuity Management plans and processes in place, so that in the event of a disaster, disruption or pandemic, all critical business and IT services provided to AMP can be maintained or recovered in a timely fashion.

On an annual basis, AMP asks relevant suppliers to provide details about its disaster recovery and business continuity arrangements by completing a questionnaire.

Supply association

AMP expects suppliers to:

- Not publicly disclose their supply association with AMP in any form without prior express written permission from an authorised AMP representative; and
- Not use any AMP image or brand elements without prior express written permission from an authorised AMP representative and then strictly in accordance with any conditions specified by AMP.

Reporting on breaches or suspected breaches of this Code

AMP expects suppliers to:

- Report non-compliance with this Code or AMP policies to their AMP relationship manager;
- Have arrangements in place for their employees and suppliers to report conduct which is illegal, unacceptable or undesirable and arrange the investigation into such reports, and take action as appropriate; and
- Notify AMP if any conduct impacts in any way the provision of services to AMP.

AMP Whistleblowing Policy

AMP has established a Whistleblowing Policy to encourage and support the reporting of disclosable matters by providing assurance to whistleblowers that it is safe to do so.

If you do not feel comfortable contacting AMP directly, you can report to our independent provider, 'Your Call', who

provides a reporting service that is secure, confidential and optionally anonymous. Contact Your Call:

- by telephone at 1300 790 228 (Australia), 0800 123 508 (New Zealand) or +61 3 9895 0012 (Intl);
- by email at amp@yourcall.com.au;
- by post to Locked Mail Bag 7777, Malvern VIC 3144 Australia; or
- online at yourcall.com.au/report using AMP1849 as the Organisation ID.
- If you are deaf, or have a hearing or speech impairment, you can contact Your Call online or access Your Call's telephone service through the National Relay Service (Australia) or New Zealand Relay. Simply choose your contact method at relayservice.gov.au or nzrelay.co.nz and request Your Call's hotline.
- You can also directly access the Group Whistleblowing Program by email: whistleblowing@amp.com.au

Social

AMP is committed to human rights and good labour practices in our own operations and in our supply chains.

Workplace Health & Safety (WH&S)

AMP is required by law to ensure the health and safety of its workers and any workers carrying out services on their behalf. When doing business with AMP, suppliers are expected meet their obligations under WHS law and to contribute to creating a safe and healthy workplace. AMP expects suppliers will:

- Comply with obligations under the relevant jurisdictional WHS legislation and the current specific WHS requirements;
- Demonstrate, where requested, an effective WHS management system;
- Consult with AMP in relation to WHS duties and obligations to determine how shared responsibilities will be managed;
- Provide information, training and guidance to ensure workers and contractors carry out their work safely;
- Report all health and safety incidents and risks and provide information on how those risks have been eliminated or mitigated in work supplied;
- Comply with the contract-specific WHS requirements.

In supplying goods, AMP expects suppliers will provide products that are designed and manufactured without risk to health and safety to people and sufficient information on their safe use, storage and disposal.

Suppliers' employees who attend AMP premises must comply with AMP WHS policies and procedures.

Wages and benefits

AMP expects that suppliers will:

- Ensure all workers shall be paid at least the minimum wage required by applicable laws and shall be provided all legally mandated benefits; wage payments shall be made at regular intervals and directly to workers, in accordance with national law, and shall not be delayed, deferred, or withheld;
- Only deductions, advances, and loans authorised by national law are permitted and, if made or provided, actions shall only be taken with the full consent and understanding of workers; clear and transparent information shall be provided to workers about hours worked, rates of pay, and the calculation of legal deductions; and
- All workers must retain full and complete control over their earnings; wage deductions must not be used as a disciplinary measure, or to keep workers tied to the employer or to their jobs; workers shall not be held in debt bondage or forced to work to pay off a debt; deception in wage commitments, payment, advances, and loans is prohibited.

Forced or involuntary labour

AMP expects that suppliers will ensure workers are not subject to any form of forced, compulsory, bonded, indentured or prison labour. All work must be voluntary, and workers shall have the freedom to terminate their employment at any time without penalty, given notice of reasonable length.

Inclusion and diversity

AMP expects suppliers will ensure that the work environment is free from unlawful discrimination, harassment, victimisation, bullying and unreasonable behaviour on any grounds, including but not limited to:

- Age
- Marital or relationship status; including same sex spouses/partners
- Race, National or ethnic origin
- Religion
- Political or ethical beliefs/activities
- Family or carer responsibilities (including parenting status and the identity of a spouse or family member)
- Physical features
- Requests about employee entitlements
- Gender, gender identity and gender expression including transgender
- Sexual orientation
- Pregnancy, potential pregnancy, childbirth or breastfeeding
- Trade union or employer association activity

- Medical record or physical, intellectual, psychological or psychiatric disability or impairment
- Compulsory retirement
- Immigration status
- Employment status
- Any other protected attributes under applicable anti-discrimination laws.

Environment

AMP expects that suppliers will:

- Comply with relevant laws and regulations as to the use, management and disposal of all resources across the supply chain;
- Where required, find ways to manage their impact on the environment in the goods and services they provide to us; and
- Where required, encourage companies in their value chain to continually improve their environmental performance, reporting and disclosure.

Further information

For further information regarding AMP policies and how they relate to the principles outlined above see the table below.

Note: Policies are listed for internal reference and are available to suppliers subject to confidentiality provisions.

If you have any questions relating to AMP policies or this Code, please contact your AMP relationship manager.

AMP policies and further information	
Document owner	Strategic Sourcing
Effective date	May 2020
Referenced documents	Code of Conduct Privacy Policy AMP Capital Privacy Statement Inclusion and Diversity Policy Whistleblowing Policy Business Continuity Management Policy Business Integrity Policy Conflicts Management Policy Environment and Social Policy Group Internal Privacy Policy Information Security Policy Outsourcing Policy Service Continuity Policy Record Retention Policy Workplace Health and Safety Global Policy Statement Workplace Respect Policy