

Supplier Code of Practice

2019

Introduction

External suppliers play an important role in helping the AMP group achieve its business objectives and meet community expectations. Suppliers 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 all suppliers who provide products or services to AMP group entities 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 the products and services provided. 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 reserves the right to update this Code from time to time 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, regulations and industry Codes of Practice eg Banking Code of Practice 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 maintain privacy and confidentiality;
- Not offer or receive gifts, hospitality, expenses or benefits that might appear to create an obligation, affect impartiality, or inappropriately affect a business decision; and
- Avoid conflicts of interest that are likely to be detrimental to AMP and avoids those that cannot be adequately managed through internal controls and/or appropriate disclosure.

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. These requirements extend to protection of suppliers' information assets that are used by AMP (or by a supplier on behalf of AMP), especially where AMP data is held on those systems. AMP is also required to ensure that suppliers' information security controls are tested periodically.

In the event of any material information security incident or control failure impacting their systems or AMP data (especially personal information), suppliers must notify AMP immediately as this must be reported to regulatory authorities within 72 hours.

Business continuity management

Similarly, AMP expects suppliers to have appropriate and effective business continuity management plans and arrangements in place, so that in the event of a disaster or disruption, 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 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 reportable conduct and protect whistleblowers from any retaliation that may arise as a result of their disclosure.
- 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 have a hearing or speech impairment, you can contact Your Call online or, in Australia only, access Your Call's telephone service through the National Relay Service (relayservice.gov.au).
- You may also report to AMP's Whistleblowing Protection Officer, Jenny Fagg, by phone at 0434 618 696 or by email at Jenny_Fagg@amp.com.au.

Social

Human rights and workplace relations

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

Workplace Health & Safety (WH&S)

To AMP, workplace health and safety means providing a workplace, tools and equipment, resources and processes that support employees to deliver on business objectives without causing harm or ill health.

AMP expects our suppliers will:

- Comply with relevant WH&S laws and regulations;
- Maintain up-to-date knowledge of significant work health and safety matters in your business to support ongoing management and training; and
- Provide information, training and guidance to ensure employees and contractors carry out their work safely.

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 labour 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.

Diversity and inclusion

AMP expects that 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, race, religion
- Gender
- National or ethnic origin
- Intersex status
- Political or ethical beliefs/activities
- Sexual orientation
- Family or carer responsibilities
- Gender identity and gender expression including transgender
- Physical features
- Trade union or employer association activity
- Pregnancy, potential pregnancy, childbirth or breastfeeding
- Requests about employee entitlements
- Medical report or physical, intellectual, psychiatric or impairment
- Compulsory retirement
- Marital or relationship status, including same sex spouses/partners
- Employment status
- Any form of unlawful harassment, discrimination, victimisation and bullying.

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;
- 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	1 March 2019
Referenced documents	AMP Privacy Policy
	AMP Capital Privacy Statement
	Code of Conduct
	Inclusion and Diversity Policy
	Whistleblowing Policy
	Conflict of Interest Policy
	Business Integrity Policy
	Business Continuity Management Policy
	Environmental Policy
	IT Service Continuity Policy
	Outsourcing Policy
	Social Responsibility Policy
	Workplace Health and Safety Policy
Workplace Respect Policy	