



Telstra Group Supplier Code of Conduct

Effective 25 March 2024



Telstra Group views its suppliers as partners and cares about the way our suppliers do business.

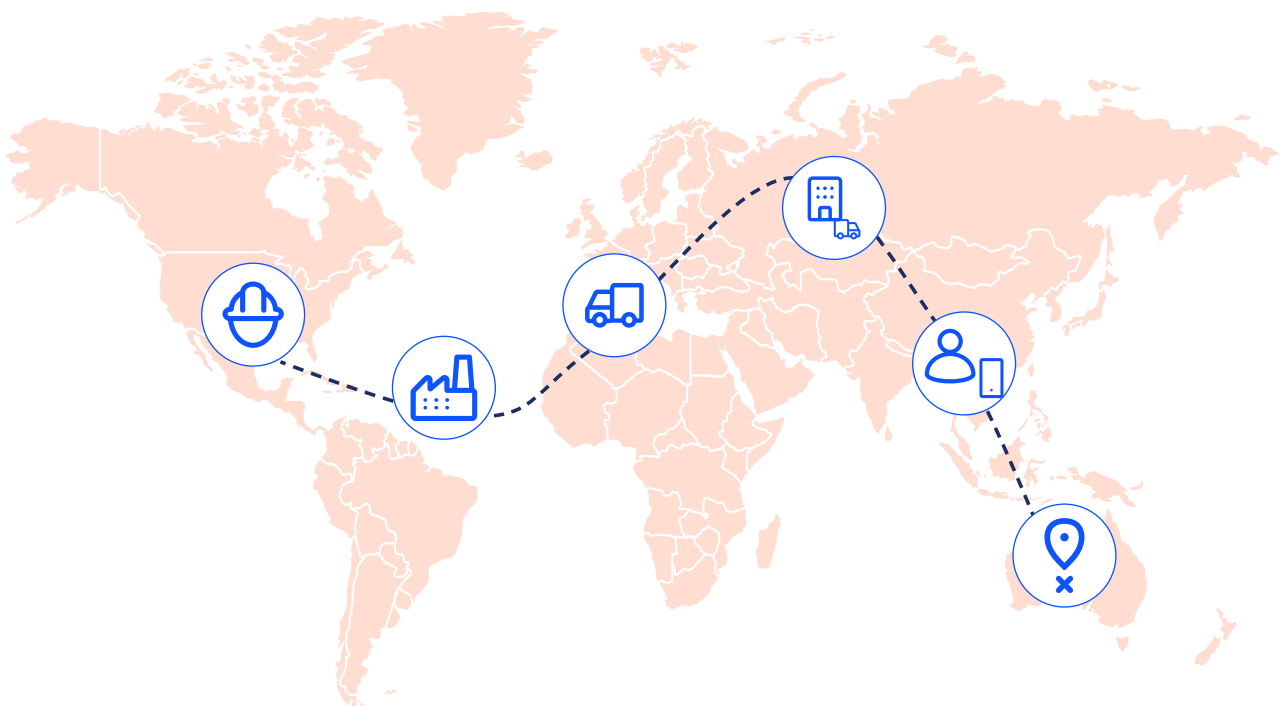
This Supplier Code of Conduct ('Code') sets out the minimum standards of behaviour that Telstra Group expects its suppliers to meet in the areas of labour and human rights, health and safety, environment, business integrity, cyber security and privacy, and supplier diversity.

This Code is aligned with the United Nations (UN) Global Compact ten universally accepted principles, Responsible Business Alliance (RBA) Code of Conduct, Joint Audit Cooperation (JAC) Supply Chain Sustainability Guidelines and other internationally recognised standards. This Code also reflects our commitment to support the UN's Sustainable Development Goals which address the world's most significant development challenges.

Suppliers must read, understand and ensure that their business and supply chain meet these standards. Suppliers must communicate this Code to related entities, their own suppliers and subcontractors who support them in supplying to Telstra Group, so that they are aware of, understand and comply with this Code.

Suppliers' ability to meet or exceed standards detailed in this Code will be a key consideration when Telstra Group makes procurement decisions as we expect all suppliers to adhere to this Code. This will happen regardless of whether or not the Code has been formally incorporated into a particular contract with the supplier. This Code does not preclude Telstra Group from including additional social, environmental, ethical, privacy or cyber security requirements into procurement contracts to address specific risks of an agreement.

In this Code, supplier means any individual or entity (including consultants and channel partners) that supplies goods or services to Telstra Group or its related companies (collectively 'Telstra Group') anywhere in the world. In this Code, workers refer to employees, contractors, agencies, migrants, students and temporary staff of the supplier and of its related entities.



Comply with Laws

Suppliers must comply with the law in the countries where they operate.

Labour and Human Rights

At Telstra Group, we respect and support human rights as set out in the International Bill of Human Rights, the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work and the ten principles of the UN Global Compact, in line with the UN Guiding Principles on Business and Human Rights. We expect suppliers to respect and support the protection of human rights of workers, as well as individuals and communities affected by their activities.

When suppliers become aware of a labour incident within their company or supply chain which is in breach of this Code, they must disclose it using the [Supplier Self-Disclosure Form](#).

Non-Discrimination

Suppliers must not engage in or support discrimination in hiring and employment practices, including on grounds of gender, age, religion, ethnicity, race, cultural background, disability, physical features, marital relationship status, sexual orientation, gender identity and expression, pregnancy or potential pregnancy, family responsibilities, political beliefs, industrial activity, union membership, irrelevant criminal record, nor personal association with a person who possesses or is thought to possess any of these attributes. Suppliers must work towards identifying and removing gender pay gaps that may exist in their workplace.

Bullying, Harassment and Disciplinary Practices

Suppliers must not use violence, threats of violence or other forms of physical coercion or harassment. Corporal punishment, mental, physical or verbal abuse, sexual harassment or sexual abuse, and harsh or inhumane treatment are prohibited. Suppliers must clearly define and communicate to workers disciplinary policies and procedures in support of these requirements.

Freedom of Association

Suppliers must respect workers' freedom of association, recognise and protect their right to collective bargaining and to form, join and administer workers' organisations.

Suppliers must protect against acts of interference with the establishment, function, or administration of workers' organisations in accordance with applicable laws. Where the right to freedom of association and collective bargaining is restricted under the law, suppliers must allow workers to freely elect their own representatives.

Suppliers must not discriminate, harass, intimidate, or retaliate against workers for being members of a union or participating in trade union activities, and provide worker representatives with access to their workplace.

Working Hours

Studies of business practices clearly link worker strain to reduced productivity, increased turnover, and increased injury and illness. Suppliers must not require workers to exceed prevailing work hours set by local law. Also, in line with International Labour Organisation (ILO) standards, workers must not be required to work more than 60 hours per week (including overtime), except in extraordinary business circumstances with their consent. All overtime work must be voluntary. Employees must be allowed at least one day off per seven-day week.

Wages and Benefits

Suppliers must make conditions of employment clear when hiring by providing employees with written documentation which outlines the basic terms and conditions of employment in a language they can understand. Foreign migrant workers must receive the conditions of employment prior to the worker departing from their country of origin and there shall be no substitution or change allowed in the employment agreement upon arrival in the receiving country unless these changes are made to meet local law and provide equal or better terms.

Suppliers must comply with applicable laws relating to wages and benefits (including minimum wage, overtime pay, allowances and piece rates). Suppliers must not use deductions from wages as a disciplinary measure and must pay workers in a timely manner. For each pay period, workers must be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labour will be within the limits of the local law.

Forced and Compulsory Labour

Suppliers must not use any form of forced, bonded, or compulsory labour, slavery, or human trafficking in any part of their business operations. Suppliers must not require workers to surrender any government-issued identification, passport or work permit or other personal document as a condition of employment. Workers shall not be required to pay employers' or agents' recruitment or any other fee for their employment.



Child and Underage Labour

Child labour is strictly prohibited. Suppliers must implement appropriate mechanisms to verify the age of workers. The minimum age for employment or work is the higher of 15 years of age, the minimum age for employment in the relevant country, or the age for completing compulsory education in the relevant country. This Code does not prohibit participation in workplace apprenticeship programs or light work as defined by the ILO. Children under the age of 18 must not be employed for any hazardous work or work that is inconsistent with their individual development, including night shifts and overtime. In the absence of local law, the wage rate for student workers, interns, and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks. If child labour is identified, you must immediately stop using child labour and ensure there is a remediation plan in place which puts the best interests of the child first and allows the child to access appropriate education until no longer a child.

Health and Safety

Our suppliers play a significant role in our business and we share a commitment to keep each other, our customers, and communities safe, secure, and well.



Safety Laws and Systems

Suppliers must identify and comply with relevant workplace and product health and safety laws regulations. We expect suppliers to implement a health and safety management system consistent with recognised standards such as ISO 45001 and ensure their workers understand and follow health and safety policies, standards, and procedures that apply to their work.



Provide a Safe and Healthy Workplace

Suppliers must provide a safe and healthy workplace for their workers and anyone that could be impacted by their activities. As a minimum, suppliers must:

- Take reasonable steps to identify workplace hazards and minimise the risk of workplace injury, illness and disease for workers;
- Provide appropriate equipment, resources, instruction, education, and training for workers to safely carry out their duties, including personal protective equipment;
- Engage with workers, customers, members of the community, and Telstra Group to manage health and safety risks;
- Implement effective systems to ensure the delivery of products and services meet relevant standards and legislative requirements, and safety

considerations are taken into account throughout the product life cycle;

- Ensure facilities and amenities for workers (including any accommodation provided) are clean, safe, and meet their basic needs. Basic needs include providing ready access to clean toilet facilities, potable water, and where accommodation is provided, hot water for bathing, adequate heating and ventilation, reasonable personal space and reasonable permission to enter and exit facilities;
- Prioritise the physical and mental health and wellbeing of workers and monitor the conditions at the workplace for the purpose of preventing illness of or injury to workers arising from the suppliers' business activities;
- Take proactive action to prevent sexual harassment in the workplace; and
- Support workers to raise health and safety issues or concerns without fear of disciplinary action, dismissal, or discrimination.



Incident Reporting and Response

Suppliers must prepare for, respond to, manage, and report workplace incidents, injuries, and emergencies, providing medical assistance to impacted parties as required.



Emergency Management

Suppliers must have systems, training, and emergency equipment in place to effectively respond to and manage incidents and emergencies. Emergency drills must be conducted at least annually or as required by local law, whichever is more stringent.

Diversity

Telstra Group values diversity and inclusion. Diversity means differences in all forms, both visible and invisible. This includes differences that relate to gender, age, cultural background, disability, religion, and sexual orientation, as well as differences in background and life experience, and interpersonal and problem-solving skills. In line with this, Telstra Group prefers suppliers who promote diversity in their supply chain, including:

- Those who publicly commit to First Nations procurement targets or engage with social enterprises and minority-owned organisations in the delivery of goods and services;
- Those with strong female gender representation, improved gender equality, active promotion of women and targeted action to address overrepresentation of women in departures, and gender pay equity gaps; and
- Those that initiate procurement activities aimed at improving the lives of people with disability or who are disadvantaged.

Environmental Considerations

Suppliers must minimise the adverse environmental impacts of their operations, products, and services. We expect suppliers to implement an environmental management system in line with recognised standards such as ISO 14001 or the EU Eco-Management and Audit Scheme (EMAS).

Environmental Laws, Permits and Reporting

Suppliers must comply with applicable environmental laws, standards, and notices from regulators. Suppliers must obtain, maintain, keep current and comply with necessary environmental permits, approvals, and registrations.

Product Content

Suppliers must deliver electrical or electronic equipment in line with relevant regulations in the regions of operation and of intended equipment use (e.g., Restriction of Hazardous Substances Directive (RoHS) and Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) in the European Union (EU)). Suppliers shall develop products or services that achieve improved environmental performance across their life cycle and at the end of useful life, including low energy consumption, delivering greenhouse gas (GHG) emissions reductions and optimising product reuse or recycling.

Climate Change and Energy Consumption

At Telstra Group, we expect our suppliers to assist us to achieve our commitment to climate change (see www.telstra.com.au/climate).

Suppliers must identify, monitor, and minimise GHG emissions and energy consumption from their own operations and value chain (scope 1, 2 and 3).

On request, suppliers will work with Telstra Group to:

- Set their own scope 1, 2 and 3 GHG emissions reduction targets within the next 2 years, which should, as far as possible, be based on science and promote renewable energy; and
- Support Telstra Group in providing verified data on scope 1, 2 and 3 GHG emissions and energy consumption (including energy efficiency ratings and carbon footprint life cycle assessment), for products and services provided to Telstra Group.

Pollution Prevention and Circularity

Telstra Group is committed to optimising the resources we use, reducing consumption and waste across our business, and investing in circular solutions that are designed to be sustainable across their life cycle.

Suppliers must work to reduce the environmental footprint of their operations, and the products and services the supplier provides to Telstra Group. Suppliers must adopt circular economy principles and minimise environmental impacts at all stages of the product life cycle – design, manufacturing, distribution, use, and end of life where possible.

In order to minimise environmental impacts, suppliers must embed eco-design in their products and services to:

- Use at least 50% recycled materials where possible, alternatively select simple and sustainably sourced materials. On request, suppliers must provide relevant information and data substantiating the recycled / recyclability products and services supplied;
- Use non-hazardous materials to ensure safe and efficient recyclability;
- Design for easy disassembly so all product components are easily repairable and recyclable without causing damage to the product;
- Design to minimise energy use and reduced GHG emissions across the life cycle of the product / service;
- Design for minimum required packaging made from at least 50% renewable or recycled content which is 100% recyclable; and
- Have a take back program in place for responsible end of life product disposal / management, participate in a product stewardship program or work with Telstra Group for responsible product / equipment end of life management.

Suppliers must identify, monitor, minimise and treat hazardous pollutants released to air, water, and soil. This includes management of wastewater, discharges and spills, and release of air emissions such as volatile organic compounds, chemicals with ozone depleting potential, particulates, and combustion by-products. Suppliers must seek to responsibly source and pursue opportunities to conserve water and energy usage where possible.

Business Integrity

At Telstra Group, we act with honesty and integrity and don't make or receive improper payments, benefits, or gains. Suppliers must act ethically and be honest, transparent, and trustworthy in all their dealings with others.

Conflicts of Interest

Suppliers must avoid actual, potential, or perceived conflicts of interest with Telstra Group employees. If conflicts of interest occur, they must be disclosed using the [Supplier Self-Disclosure Form](#) to ensure appropriate steps are taken to manage the conflict.

Bribery and Corruption

Suppliers must comply with applicable anti-bribery and anti-corruption laws and must have adequate policies and procedures in place to monitor compliance with such laws.

Telstra Group strictly prohibits bribes, pay-offs, "facilitation payments" (payments to speed up routine actions), secret, unjustified or inflated commissions, kickbacks and any like payments or improper benefits, whether directly or indirectly, no matter how large or small in value. This includes payments to or from any person (including public officials, foreign officials, foreign political parties, or candidates for foreign political office) for the purpose of assisting a party to obtain or retain business for or with, or to direct business to, any person. This applies even if it is legal or common practice in a country.

Intellectual Property and Fair Competition

Suppliers must respect the intellectual property rights of Telstra Group and other third parties. Any transfer of technology and knowhow must be handled in a manner that protects intellectual property rights.

Suppliers must conduct their business in full compliance with anti-trust and fair competition laws, and disclose information regarding business activities, structure, financial situation and performance in accordance with applicable laws. Falsification of records or misrepresentation of conditions or practices is unacceptable.

Trade Controls

Suppliers must comply with all applicable laws and regulations relating to sanctions, export, re-export, deemed exports, import and trade controls including but not limited to the laws enacted by Australia, the UN, the US, the EU and the UK.

Responsible Sourcing of Minerals

Suppliers must exercise due diligence to reasonably assure that the minerals they use in their supply chain (e.g., tantalum, tin, tungsten and gold) do not originate from regions associated with armed conflict and do not directly or indirectly finance or benefit groups that are perpetrators of serious human rights abuse. Suppliers must also exercise due diligence to reasonably assure that the minerals they use in their supply chain are not supplied by businesses or organisations engaged in modern slavery as defined in the Modern Slavery Act (2018).

Cyber Security and Privacy

Cyber Security and Privacy are non-negotiable parts of how we work. We expect our suppliers to work with us to protect Telstra Group and our customers' data and networks. Suppliers must implement industry best practice or technical and organisational security measures that align with Telstra Group's security policies including managing and monitoring their supply chain to protect Telstra Group and our customers' data and networks from breaches and unauthorised access. Where Telstra Group requires suppliers to meet specific security requirements, including the use of Telstra Group approved solutions or services and / or restrictions on data storage or access / support locations, these requirements must be met. National security requirements under Australian law may apply depending on the nature of the services provided by the supplier and must be strictly adhered to. When suppliers become aware of a data or network breach, they must immediately notify Telstra Group.

Suppliers must treat Telstra Group's and our customers' data as confidential information and only use that data for the purpose of providing services to Telstra Group.

Telstra Group's [Privacy Statements](#) outline our privacy commitment and explain how we collect, use, disclose and protect personal information of individuals we deal with. Suppliers who collect, use, store or have access to personal information held or provided by Telstra Group must have adequate processes and effective technical security controls in place to protect personal information from misuse, interference, loss, and unauthorised access, modification, and disclosure. Suppliers must have adequate processes and controls to monitor compliance with applicable security and privacy laws and contractual obligations, including requirements such as executing a Data Protection Agreement when acting as a data processor under the EU General Data Protection Regulations or US privacy laws. Suppliers must not do anything which would cause Telstra Group to be perceived as acting inconsistently with our Privacy Statements and the Telstra Group Privacy Principles.

Effective Management and Grievance Mechanisms

Suppliers shall develop, communicate, implement, and maintain policies consistent with this Code and maintain appropriate management systems and documentation to demonstrate compliance with the Code. Management accountability and responsibility for ensuring implementation of such management systems must be clearly defined.

Suppliers must provide workers, their suppliers, and members of the community in which they operate in or provide services to with a confidential means to report violations of this Code. Suppliers must have procedures in place to allow workers to bring workplace concerns to the attention of management for resolution, and communicate these procedures to workers. The procedures, and associated communication, must be accessible, culturally appropriate and in a language workers understand. Workers must be able to openly communicate and share concerns about working conditions and management practices without fear of retaliation.

Enforcement Provisions

Telstra Group may at any time review or audit a supplier's compliance with this Code. In such an event, the supplier must co-operate by providing information, documents, and access to staff as Telstra Group reasonably requires. In addition, where Telstra Group has reasonable grounds to suspect a breach of this Code by a supplier, Telstra Group may require the supplier to provide additional information and, in serious cases, submit to an immediate audit at the supplier's cost.

If a supplier becomes aware of a reasonable risk of a breach to this Code, the supplier must notify Telstra Group as soon as practicable. Suppliers must use the [Supplier Self-Disclosure Form](#) to disclose conflicts of interest relating to Telstra Group employees and labour practice incidents. Any identified deficiencies must be corrected on a timely basis as directed by Telstra Group.

We take this Code seriously and any material non-compliance may result in the termination of the supplier's business relationship with Telstra Group.

Continuous Improvement

Suppliers are encouraged to go beyond compliance to applicable laws and take responsibility to continually improve social and environmental conditions and ethical behaviour.



Telstra Group's Whistleblowing Service

Acting ethically and with integrity is core to what we stand for, so we encourage you to report any concerns you have about illegal, unethical or improper conduct, or suspected violations of this Code.

Telstra Group's confidential and anonymous whistleblowing service can be accessed at www.telstra.ethicspoint.com.