



Telstra Supplier Code of Conduct

Effective 28 February 2019



Telstra 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 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.

Telstra expects suppliers to read, understand and ensure that their business and supply chain meet these standards. Suppliers must communicate this Code to related entities, suppliers and subcontractors who support them in supplying to Telstra, 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 taken into account by Telstra when making procurement decisions. 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 from including additional social, environment, ethical, privacy or cyber security requirements into procurement contracts to address specific risks of an agreement

By supplier, Telstra means any entity that supplies goods or services to Telstra Corporation Ltd or its related companies anywhere in the world. Where this Code refers to workers, this includes employees, contractors, agency, migrant, student 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, we respect and support human rights as set out in the Universal Declaration of Human Rights and the ten principles of the UN Global Compact. 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.

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.

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 are restricted under the law, the company shall allow workers to freely elect their own representatives.

Suppliers shall 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.

Wages and Benefits

Suppliers must comply with applicable laws relating to wages and benefits (including minimum wages, overtime pay, and piece rates). Suppliers must not use deductions from wages as a disciplinary measure and must pay workers in a timely manner.

Working Hours

Suppliers must not require workers to exceed prevailing local work hours. Also, in line with International Labour Organisation (ILO) standards, workers shall not be required to work more than 60 hours per week (including overtime), except in extraordinary business circumstances with their consent. Employees should be allowed at least one day off per seven-day week.

Forced and Compulsory Labour

Suppliers must not use any form of forced, bonded, compulsory labour, slavery or human trafficking. 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. 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 shall not be employed for any hazardous work or work that is inconsistent with their individual development.

Health and safety

At Telstra, no job is so important or urgent that it cannot be done safely. Our suppliers play a significant role in our business and our commitment to keep each other, our workers, customers and the public safe.

Suppliers must identify and comply with relevant workplace and product health and safety laws and ensure their workers understand and follow health and safety policies, standards and procedures that apply to their work.

Suppliers must provide a safe and healthy workplace and care for their workers and anyone that could be impacted by their activities by:

- taking reasonable steps to identify workplace hazards and minimise the risk of workplace injury, illness and disease for workers;
- providing appropriate equipment, resources, instruction, education and training for workers to safely carry out their duties, including personal protective equipment;
- engaging with workers, customers, members of the community, and Telstra to manage health and safety risks;
- implementing effective systems to ensure products and service delivery meet relevant standards and legislative requirements, and safety considerations are taken into account throughout the product lifecycle;

- ensuring facilities and amenities for workers (including any accommodation provided) are clean, safe and meets their basic needs. Basic needs includes 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;
- monitoring the health of workers and the conditions at the workplace for the purpose of preventing illness or injury of workers arising from the suppliers' business activities; and
- supporting workers to raise health and safety issues or concerns without fear of disciplinary action, dismissal or discrimination.

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

Suppliers must have systems, training and emergency equipment in place to effectively respond to and manage incidents and emergencies.

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 EMAS.

Environmental Laws, Permits and Reporting

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

Pollution Prevention and Resource Efficiency

Suppliers must identify, monitor, minimise and treat hazardous pollutants released to air, water and soil. This includes management of wastewater such as discharges and spills entering storm drains and release of air emissions such as volatile organic compounds, chemicals with ozone depleting potential, particulates and combustion by-products.

Suppliers shall work to reduce the use of raw materials and resources in their operations, as well as the elimination, substitution, re-use and recycling of materials and solid waste. Packaging supplied to Telstra shall be sustainably sourced, made from recycled content and recyclable where possible.

Climate Change and Energy Consumption

Suppliers must identify, monitor and minimise greenhouse gas (GHG) emissions and energy consumption from their own operations.

Product Content

Suppliers shall deliver electrical or electronic equipment in line with relevant regulations in the regions of operation and of intended equipment use (e.g. RoHS and REACH in the European Union (EU)). Suppliers shall develop products or services that achieve improved environmental performance across the whole lifecycle including low energy consumption, delivering GHG emissions reductions and product reuse or recycling.

Business integrity

At Telstra, 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 dealing with others.

Conflict of Interest

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

Bribery and Corruption

Suppliers must comply with applicable anti-bribery and anti-corruption laws (including but not limited to the US Foreign Corrupt Practices Act 1977, as amended, and the UK Bribery Act of 2010), and must have adequate policies and procedures in place to monitor compliance with such laws.

Telstra 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 candidate 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.

Responsible Sourcing of Minerals

Suppliers are expected to exercise due diligence to reasonably assure that the tin, tantalum, tungsten and gold in the products it manufacturers does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuse in the Democratic Republic of Congo or an adjoining country. Suppliers shall not direct or indirectly support organisations and individuals associated with illegal activities, human rights abuses or terrorism.

Trade Controls

Suppliers must comply with all applicable laws and regulations relating to sanctions, export, re-export, import and trade controls (including, laws and regimes enacted by Australia, the UN, the US and the EU).

Intellectual Property and Fair Competition

Suppliers shall respect intellectual property rights of Telstra 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.

Cyber Security & Privacy

We expect our suppliers to work with us to protect Telstra and our customers' data and networks. Suppliers must implement industry best practice or standard technical and organisational security measures, including managing and monitoring their supply chain to protect Telstra and our customers' data and networks from breaches. Suppliers must treat Telstra and our customers' data as confidential information and only use that data for the purposes of providing services to Telstra. If the Supplier becomes aware of a data or network breach then the Supplier must immediately notify Telstra.

Telstra's [Privacy Statement](#) outlines our privacy commitment and explains how we collect, use, disclose and protect our customers' personal information. Privacy is a non-negotiable part of how we work. Suppliers must apply adequate data privacy and security protection to protect the personal information of our customers and employees from unauthorised access, use and disclosure. Suppliers who collect, use, store or have access to our customers' personal information must have adequate processes and procedures in place to monitor compliance with applicable privacy laws and contractual privacy obligations with Telstra. This includes suppliers not doing anything which would cause Telstra to be perceived as acting inconsistently with the Telstra Privacy Statement and the Telstra Privacy Principles.

Diversity

Telstra is committed to being a diverse and inclusive company and achieving greater diversity in our supply chain. At Telstra diversity means, difference in all its forms, both visible and not visible, and includes differences that relates 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 prefers suppliers who promote diversity in their supply chain, including:

- Those who publically commit to Indigenous procurement targets or engage with social enterprises and minority-owned organisations in the delivery of goods and services,
- Those with strong female gender representation, improve gender equality, actively promote women and, seek to address overrepresentation of women in departures and gender pay equity gaps.

- Those that initiate procurement activities aimed at improving the lives of people with disability or who are disadvantaged.

Effective management

Suppliers should develop, maintain and implement policies consistent with this Code and maintain appropriate management systems and documentation to demonstrate compliance with the Code.

Suppliers must provide workers, their suppliers, and members of the community in which they operate or provide services with a confidential means to report violations of this Code.

Enforcement provisions

Telstra may at any time review or audit a supplier's compliance with this Code. In such event the supplier should co-operate by providing information, documents and access to staff, as Telstra reasonably requires.

If a supplier becomes aware of a reasonable risk of a breach of this Code, the supplier must notify Telstra as soon as practicable. Any identified deficiencies must be corrected on a timely basis as directed by Telstra.

Where Telstra has reasonable grounds to suspect a breach of this Code by a supplier, Telstra may require the supplier to take additional steps which may include the provision of additional information or, in serious cases, submit to an independent audit at the supplier's premises at the supplier's cost. We take this Code seriously and any material non-compliance may result in the termination of the supplier's business relationship with Telstra.

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's Whistleblowing Service

It is important to us that anyone can report concerns about illegal, unethical or improper conduct.

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