

# Telstra Group Supplier Code of Conduct

Effective 31 March 2025



# 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.

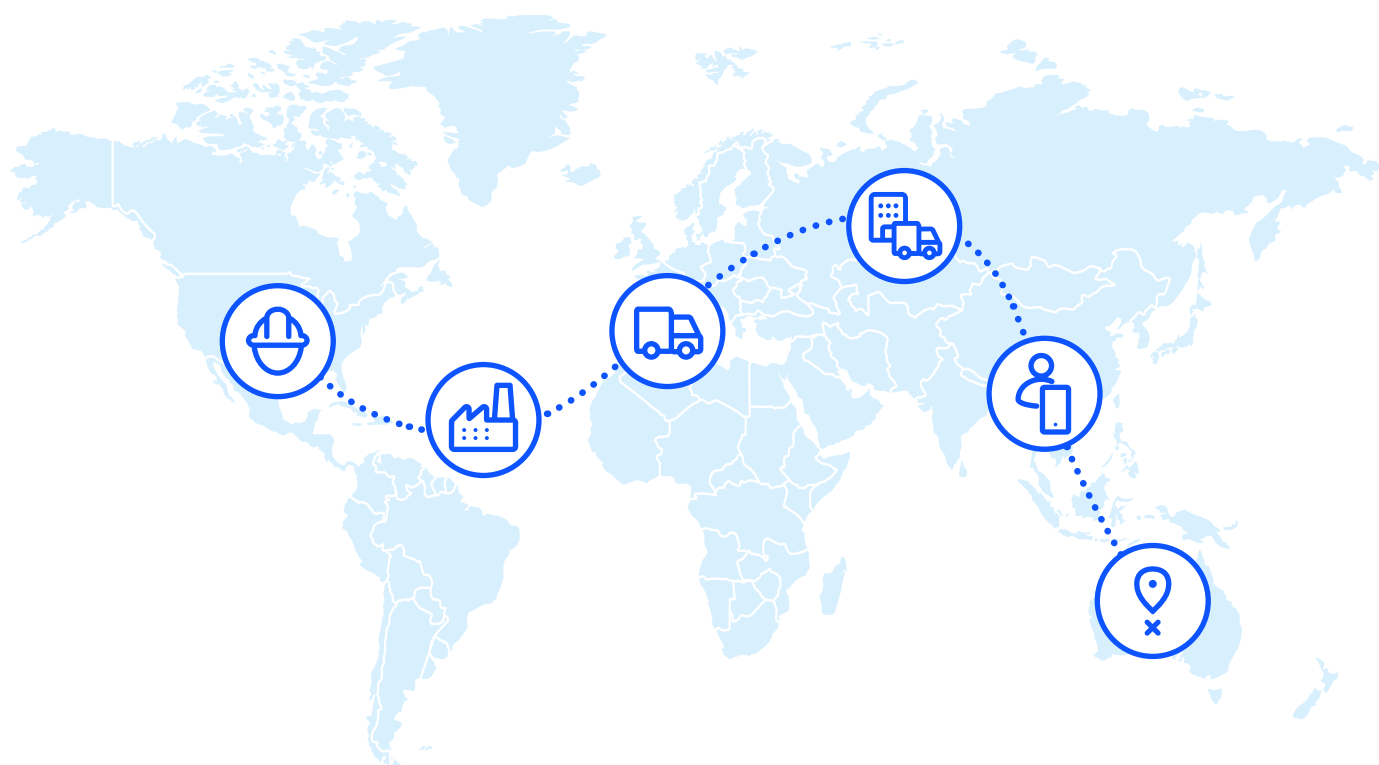
This Code is aligned with the United Nations ('UN') Global Compact's ten universally accepted principles, Responsible Business Alliance Code of Conduct, Joint Alliance for Corporate Social Responsibility Supply Chain Sustainability Guidelines and other internationally recognised standards. This Code 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 operations and supply chain meet these standards. Suppliers must communicate this Code or requirements consistent with 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 or requirements consistent 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. This applies whether or not the Code is part of a supplier contract.

Telstra Group may add other social, environmental, ethical, privacy or cyber security requirements in procurement contracts to address specific risks.

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 refers to employees, contractors, agencies, migrants, students and temporary staff of the supplier and of its related entities.



# Compliance with Laws

Suppliers must comply with the laws in the countries where they operate. Where the Code imposes a higher standard than applicable laws, then suppliers should comply with the higher standard outlined in the Code, provided that they must always comply with applicable law. Suppliers must also have adequate policies and procedures in place to monitor compliance with such laws and this Code.

## Labour and Human Rights

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

### Non-discrimination

Suppliers must not engage in or support any form of discrimination in hiring or employment practices, including on grounds of gender, language, age, religion, ethnicity, race, cultural background, disability, physical features, marital status, sexual orientation, gender identity and expression, pregnancy or potential pregnancy, family responsibilities, political or other opinion, national or social origin, property, birth, industrial activity, union membership, irrelevant criminal record or other recognised status. 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, corporal punishment, mental, physical, sexual or verbal abuse or harassment, harsh or inhumane treatment, threats of violence or other forms of physical coercion or harassment. 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, and right to collective bargaining, including to form and join workers' organisations.

Suppliers must protect against 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 and join alternative lawful forms of worker representations.

Suppliers must not discriminate, harass, intimidate, or retaliate against workers or their representatives for being members of workers' organisations or participating in workers' organisation activities. Suppliers must provide worker representatives with access to their workplace.

### Working Hours

Suppliers must not require workers to exceed working hours set by applicable law or the relevant ILO standards, whichever provides the lower working hours. In line with 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 provide employees with written documentation at the time of hiring 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 departing from their country of origin and there must be no substitution or change allowed in the employment agreement upon arrival in the receiving country, unless these changes are made to meet applicable law, provide equal or better terms, and are explained to the worker in a language they understand.

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 if any are made they must not breach applicable law and be communicated to workers in advance. Suppliers 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 applicable law.

## Forced and Compulsory Labour

Suppliers must not use any form of modern slavery, including forced, bonded, or compulsory labour, slavery, servitude, deceptive recruitment, or human trafficking in any part of their business operations.

Employment must be freely chosen. Suppliers must not require workers to surrender any government-issued identification, passport or work permit or other personal document as a condition of employment.

Suppliers must not require workers to pay employers' or agents' recruitment or any other fee for their employment. Suppliers must not unreasonably restrict workers' freedom of movement, including on site and at any provided accommodation.

## Child and Underage Labour

Suppliers must not use child labour. 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 in line with ILO standards.

Young workers under the age of 18 must not undertake hazardous work or work that is inconsistent with their individual development, including night shifts and overtime. In the absence of applicable law, the wage rate for student workers, interns, and apprentices must be at least the same wage rate as other entry-level workers performing equal or similar tasks. If child labour is identified, suppliers 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 and 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 or injury to workers arising from the suppliers' business activities;
- take proactive action to prevent sexual abuse and 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, and provide 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 applicable law, whichever is more stringent.

# Diversity

Telstra Group values diversity and inclusion. Diversity means differences in all forms, both visible and invisible. This includes, but is not limited to, 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.

## Emissions and Energy Consumption

At Telstra Group, we expect our suppliers to assist us to achieve our commitment to climate change (see our [Climate Change page](#)).

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:

- 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;
- provide carbon footprint life cycle assessments, undertaken in line with recognised standards such as ISO 14040 and ISO 14044; and
- provide updates on progress towards their own scope 1, 2 and 3 GHG emissions reduction targets (if in place) and, if not, set their own scope 1, 2 and 3 GHG emissions reduction targets within the next 2 years of commencing their supply contract with Telstra.

These should, as far as possible, be based on science and aligned with the goals of the Paris Agreement.

## Climate and Nature Impacts

Telstra is committed to assessing, managing and disclosing its material climate risks, including in accordance with the requirements for climate-related financial disclosures under the Australian Sustainability Reporting Standards. Telstra is also committed to addressing its nature risks and dependencies, guided by voluntary adoption of the Taskforce for Nature-related Financial Disclosures.

If requested by Telstra, suppliers must identify and assess the short, medium and long-term impacts of climate change on their business and value chain, including how these may affect their ability to deliver services to Telstra Group. Suppliers must consider their dependencies on natural assets, and how changes in these assets in the short, medium or long-term may impact their ability to deliver services to Telstra Group. They must also take steps to improve their resilience in the face of material climate and nature impacts.

## 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 they provide 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. On request from Telstra, the supplier will provide eco-labels certified in line with recognised standards, such as ISO 14024.

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 from Telstra, the supplier will verify claims on recycled content in line with recognised standards such as ISO 14021 and 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.
- 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](#) as soon as practicable. Disclosures are required to ensure appropriate steps are taken to manage the conflict. Failure to disclose an actual, potential, or perceived conflict of interest will be a breach of this Code by the supplier.

## Bribery and Corruption

Suppliers must not offer, pay or accept 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 such payments are 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. Suppliers must not falsify records or misrepresent conditions or practices.

## 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 any minerals they use in their supply chain (e.g., tantalum, tin, tungsten, gold and cobalt) are sourced responsibly, in line with the Organisation for Economic Co-operation and Development ('OECD'). Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas 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 require our suppliers to work with us to protect Telstra Group and our customers' data and networks. Suppliers must implement industry best practice 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, such as the use of Telstra Group approved solutions or services, restrictions on data storage, access, support locations, and security assessments, these requirements must be met. National security requirements under Australian or International laws and/or regulations may apply, depending on the nature of the services provided by the supplier and must be strictly adhered to. If a Supplier becomes aware of a data or network breach, or suspects one, or is or may be required by law to disclose any Telstra Data, then the Supplier must immediately notify Telstra in accordance with their contract. If their contract has no such details, Suppliers must immediately notify their Telstra Representative and disclose by following the instructions in the Enforcement Provision section.

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 and organisational measures 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 relevant privacy laws.

## Effective Management and Grievance Mechanisms

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

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 raise concerns about the issues covered in 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. Suppliers must ensure that workers who raise concerns are protected from retaliation.

## Enforcement Provisions

Telstra Group may at any time review or audit a supplier's and their subcontractor'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. Suppliers must ensure that their contracts with their suppliers contains a corresponding right so Telstra can exercise such audit rights.

If a supplier breaches this Code, or becomes aware of a reasonable risk of a breach to this Code, the supplier must notify Telstra Group as soon as practicable, using the [Supplier Self-Disclosure Form](#). Any identified areas of non-compliance with this Code 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 with applicable laws and continuously improve their social and environmental practices 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 [EthicsPoint: Telstra's independent Whistleblowing site](#).

For concerns that relate to, or involve, any of our services that are indirectly provided to the United States Government in our capacity as a subcontractor, you can also access the following two whistleblowing service channels: 'The United States Office of Inspector General's Department of Defense Hotline', at [Hotline \(dodig.mil\)](#) or by phone at +1-800-424-9098; and 'The Global Human Trafficking Hotline', via email at [help@befree.org](mailto:help@befree.org) or by phone at +1-844-888-FREE.

Before you make a report using these channels, you should consider the differences in privacy protection, information capture, follow up processes and / or your other rights and protections as a whistleblower in the United States compared to Australia or other countries. Refer to the [Department of Defence Whistleblower Protection Brochure](#) found at [dodig.mil](http://dodig.mil) for more information.

