

People First Bank Supplier Code of Conduct

01 July 2025

1. Purpose

People First Bank is committed to doing business in an ethical, environmentally, and socially responsible manner. We are dedicated to maintaining sustainable and responsible practices across our supply chain.

The People First Bank Supplier Code of Conduct sets out the expectations that the bank has of businesses that want to partner with us, and outlines what constitutes a responsible supplier. It outlines the requirements for suppliers to adhere to high standards of integrity, risk management, compliance, and social responsibility.

It enhances our commitment to our customers and the communities in which they live by outlining clear standards and expectations. Ultimately, it ensures the promotion of fairness, respect for human rights, and environmental stewardship in our business practices.

2. Application of This Code

This Code applies to all procurement activities regardless of their value from 1 July 2025. Suppliers are expected to read, understand and communicate the principles of this code to relevant management, employees and subcontractors who support them in their supply to People First Bank.

People First Bank reserves the right to only do business with suppliers who demonstrate compliance with this Code.

Suppliers are expected to proactively self-assess compliance and take action to remedy any shortcomings. Suppliers with queries on how the Code is applied in any procurement activity should contact Group Procurement: procurement@heritage.com.au.

3. Risk Assessment and Corporate Governance

We have a responsibility to conduct due diligence before entering relationships with suppliers. People First Bank reserves the right to carry out regular assessments of suppliers, by self-assessment questionnaires, requests for information or site visits.

People First Bank requires that suppliers will:

- Provide complete and transparent responses to any information requests.
- Self-monitor their compliance with this code and inform us of non-compliance.
- Demonstrate appropriate risk management and governance to ensure compliance with applicable laws and regulations and this code.

In the event of any identified risks or issues, we require that suppliers promptly communicate them with us. This transparent communication is essential to minimising the potential of any impact on our operations and services. This allows for People First Bank to remain committed to maintaining a robust and resilient supply chain.

4. Risk Management and Security

People First Bank prioritises the integrity, confidentiality and security of our operations and is committed to protecting the privacy of our customers. Suppliers must implement robust risk management and information security strategies to protect against cyber threats, data loss and unauthorized access. All suppliers must comply with legal and regulatory requirements and in accordance with applicable contract terms.

5. Ethical Business Practices

5.1 Record Keeping and Documentation

Suppliers are expected to maintain adequate records of financial transactions and information regarding its business activities, labour, health and safety, as well as environmental practices in accordance with applicable laws, policies and procedures. Where suppliers are expected to disclose information in accordance with the provisions set out in any contract between us, as required by law or regulation, disclosure of this information is expected to be undertaken without falsification or misrepresentation.

5.2 Manage Conflicts of Interest

Suppliers are expected to ensure that all conflicts of interest (whether actual, reasonably perceived or potential) are disclosed, managed and recorded as soon as possible.

5.3 Gifts and Hospitality

Suppliers are expected to adhere to a strong ethical framework, ensuring that gestures relating to gifts and hospitality comply with the law. Suppliers are expected to avoid offering or accepting gifts, entertainment or hospitality that could improperly influence, or appear to influence, business decisions.

5.4 Bribery and Corruption

People First bank maintains a zero-tolerance approach to bribery and corruption. Suppliers must not engage in fraudulent or corrupt activities including, for example, bribery or money laundering, or act in any manner which, by association, brings People First Bank into disrepute.

5.5 Meeting Required Standards

The goods and services provided must meet relevant compliance requirements and the Australian Standard (or a commensurate international standard) where specified. For building and construction this also includes using conforming products and materials.

6. Social Expectations

As part of our commitment to social responsibility, we expect suppliers to act as ethically and responsibly, contribute to the wellbeing of communities, uphold human rights, and promote fair and ethical treatment of all individuals.

6.1 Manage Workplace Health, Safety and Security

Suppliers are expected to demonstrate a safe and healthy workplace by:

- Complying with all relevant local and national laws and regulation of the country in which they operate, including those related to psychological health and safety.
- Providing a safe and hygienic work environment through proactive risk management, accident prevention, and regular role-specific health and safety training.
- Maintaining a zero-tolerance approach to sexual harassment, ensuring a safe environment for all employees and stakeholders, and taking immediate action in response to any complaints or incidents of harassment.

6.2 Human Rights

People First Bank is committed to respecting and upholding fundamental human rights across all areas of our operations and supply chain. Our expectations are guided by the Australian Modern Slavery Act 2018 or commensurate international standard.

We expect suppliers to share this commitment by:

- Embedding ethical practices that protect the dignity, safety, and rights of all workers. This includes taking proactive steps to identify, prevent, and address the risks of modern slavery and other forms of human rights exploitation.
- Ensuring their operations and supply chains are free from human rights abuses, including forced labour, child labour, involuntary prison labour, coercion, slavery, or trafficking.
- Providing fair pay and working conditions, including minimum wage, rest breaks, leave entitlements, and respecting workers' rights to unionise and collectively bargain.
- Ensuring that all workers have the legal right to work in the country where they are employed, including the appropriate verification of valid work visas or permits, and not withholding or confiscating personal identification documents.

6.3 Community

People First Bank encourages suppliers to actively engage with and support the communities in which they operate and contribute positively to their wellbeing and development. This can include fostering an inclusive and diverse supply chain by providing opportunities to suppliers from diverse backgrounds and underrepresented groups, supporting local communities through procurement from local businesses, and giving back through community and philanthropic programs.

6.4 Diversity & Inclusion

Suppliers are expected to foster diversity, equity and inclusion across their workforce and supply chain. Suppliers are encouraged to implement policies and practices that promote diversity and inclusion, and ensure equal opportunities for all employees, stakeholders, including within their supply chain.

6.5 First Nations Rights

Suppliers are expected to take reasonable steps to prevent or mitigate any adverse impact their activities may have on the rights of First Nations peoples, including but not limited to discrimination, land rights and cultural protocols.

People First Bank is committed to contributing to the advancement of reconciliation in Australia, and we encourage suppliers to explore opportunities to engage First Nations businesses in their supply chains.

6.6 Accessibility

Suppliers should take proactive steps to ensure their products, services, and environments are accessible, regardless of ability, in compliance with applicable laws and standards. This should include regular accessibility assessments and audits to identify and mitigate barriers to access.

7. Environmental Expectations

People First Bank is committed to understanding and reducing our environmental footprint. We aim to work with suppliers who share this vision and minimise the possible negative environment impacts of the goods and services we procure.

7.1 Compliance with Environmental Laws and Regulations

Suppliers are expected to comply with all applicable federal, state, and local environmental laws, regulations, and standards. This includes, but is not limited to, laws related to air quality, water pollution, waste management, hazardous materials, and climate change. Suppliers must maintain all necessary permits, licenses, and authorisations and operate in full compliance with their terms and conditions.

7.2 Resource Efficiency and Waste Reduction

Suppliers are expected to strive to minimise their consumption of natural resources, including energy, water, and materials. Suppliers are expected to implement waste reduction and recycling programs, and properly manage and dispose of waste in accordance with applicable regulations.

7.3 Climate Change Mitigation

Suppliers are expected to take steps to reduce greenhouse gas emissions and mitigate climate change impacts. This may include energy efficiency initiatives, the use of renewable energy sources, and participation in carbon reduction programs.

7.4 Biodiversity and Ecosystem Protection

Suppliers are expected to minimise their impact on biodiversity and ecosystems. This includes avoiding activities that harm endangered or threatened species, protecting natural habitats, and promoting biodiversity conservation.

7.5 Supply Chain Sustainability

We encourage suppliers to extend their environmental responsibility throughout their supply chain. We recommend that suppliers assess and manage environmental risks associated with their third-party suppliers and subcontractors and work collaboratively to improve overall supply chain sustainability.

8. Ensuring Accountability

8.1 Whistleblowing

Where suppliers or workers become aware of any breach to this Code of Conduct, they can raise it anonymously by independent hotline service, Stopline. People First Bank prohibits retaliation, intimidation, or harassment against anyone who has in good faith reported a suspected breach of the code. For more information on how reports are handled, please refer to our Whistleblowing Policy, available on our website, [Whistleblower Policy](#).

Stopline can be contacted by:

Phone: 1300 30 45 50

Email: pfb@stopline.com.au

Online: pfb@stopline.com.au