

People First Bank Supplier Code of Conduct

01 June 2026

1. Purpose

People First Bank is committed to conducting business in an ethical, environmentally, and socially responsible manner. This commitment extends to our supply chain, where we maintain sustainable and responsible procurement practices.

The People First Bank Supplier Code of Conduct establishes the requirements for businesses partnering with us and outlines the expected standards of integrity, risk management, compliance, and social responsibility. By setting these clear benchmarks we enhance our commitment to our customers and communities, ensuring the promotion of fairness, human rights, and environmental stewardship throughout our operations.

2. Regulatory & Standards Framework

This Code reflects applicable Australian laws and international standards, including:

- UN Guiding Principles on Business and Human Rights
- International Labour Organization Core Conventions
- OECD Guidelines for Multinational Enterprises on Responsible Business Conduct
- Modern Slavery Act 2018 (Cth)

Suppliers must comply with all applicable laws in the jurisdictions they operate and conduct business consistently with internationally recognised labour, human rights, environmental, and ethical standards.

3. Scope and Application

This Code has been updated and applies to all suppliers and procurement activities from 1 July 2026.

Suppliers are required to:

- Understand and communicate the principles of this Code to employees, contractors, and subcontractors
- Implement reasonable measures to ensure compliance and remediate identified issues promptly
- Notify People First Bank of any matters that may affect compliance with this Code

Failure to comply with these standards may lead to corrective action plans or, where necessary, termination of the business relationship.

4. Governance & Risk Management

People First Bank may conduct risk assessments and reviews to ensure suppliers meet the standards outlined in this Code.

Suppliers are expected to:

- Maintain appropriate governance and internal controls
- Respond to information requests in a timely and transparent manner
- Remediate any identified issues promptly and disclose significant risks that may impact People First Bank

5. Information Security

Suppliers must ensure the confidentiality, integrity, and availability of all data and systems accessed or managed on behalf of People First Bank. This includes adherence to applicable data protection laws, privacy legislation, and contractual security obligations.

Suppliers are expected to:

- Safeguard sensitive and proprietary information, using robust encryption, secure storage, and rigorous access controls
- Access information solely for approved purposes and prevent unauthorised disclosure, specifically ensuring that subcontractors meet equivalent security and privacy standards
- Implement strong cybersecurity practices, including unique credentials, least-privilege access, secure configurations, regular patching, monitoring, and logging
- Promptly report any security incidents, breaches, or suspected vulnerabilities to the organisation
- Ensure subcontractors adhere to equivalent security and privacy standards
- Retain information only as necessary and dispose of data securely when no longer required
- Provide regular information security and privacy training to staff

Suppliers should take proactive steps to protect systems and data, including encrypting sensitive files, using multi-factor authentication, and reporting lost or stolen devices immediately.

6. Ethical Business Practices

a. Record Keeping and Documentation

Suppliers must maintain adequate records of financial transactions and business activities, labour, health, safety, and environmental practices to comply with applicable laws and regulations. Any disclosure of information – whether required by contract or law - must be transparent and free from falsification or misrepresentation.

b. Manage Conflicts of Interest

Suppliers must identify, disclose and record any actual or perceived conflicts of interest as soon as possible. Once disclosed, these conflicts must be managed in a manner that ensures the integrity of the business relationship.

c. Gifts and Hospitality

Suppliers must operate within a strict ethical framework, regarding gifts and hospitality. You are required to avoid offering or accepting any inducements, including entertainment or travel, that could improperly influence, or appear to influence, business decisions.

d. Fraud, Bribery and Corruption

People First Bank maintains a zero-tolerance approach to fraud, bribery and corruption. Suppliers must not engage in, or be associated with, fraudulent or corrupt activities, including bribery, kickbacks or money laundering. Any action that brings People First Bank into disrepute may result in immediate contract termination. It is expected that Suppliers will immediately notify People First Bank in the instance that any internal fraud, bribery or corruption is identified.

e. Quality and Compliance Standards

All goods and services provided must meet relevant regulatory requirements and the applicable Australian Standard (or equivalent international standard). In building and construction this explicitly includes the use of conforming products and materials.

f. Use of Company Name, Branding and Logos

Suppliers must not use People First Bank's name, logos, or branding in any external materials without prior written consent. Any approved use must comply with People First Bank's requirements and must not imply endorsement or affiliation beyond the contractual relationship. People First Bank may withdraw consent at any time, and the Supplier must immediately cease use upon notice.

g. Payment Terms to Subcontractors

Suppliers are expected to ensure that subcontractors are paid on fair and reasonable terms that are broadly consistent with the payment terms agreed with People First Bank, and in all cases in accordance with applicable law.

7. Human Rights & Social Responsibility

Suppliers must uphold the high standards of human rights and social responsibility across their operations and supply chains.

a. Human Rights Obligations

Suppliers must align to the Australian Modern Slavery Act 2018, the UN Guiding Principles on Business and Human Rights (UNGPs) and ILO Core Conventions. You are required to:

- Proactively identifying and remediate risks of modern slavery, including forced, child, or involuntary prison labour, and human trafficking
- Provide fair pay and working conditions, ensuring compliance with minimum wage, rest breaks, leave entitlements and the right to unionise and collectively bargain
- Verify the legal right to work for all employees and contractors, ensuring no personal identification documents are withheld
- Monitor subcontractors and provide human rights training to staff to ensure these standards are maintained throughout your own supply chain

b. Workplace Health, Safety and Security

Suppliers must provide a safe and secure working environment that complies with applicable local and national health and safety requirements. This includes:

- Implementing proactive safety training, emergency drills, and providing appropriate protective equipment.
- Enforce a zero-tolerance policy for harassment, bullying, or violence, with clear mechanisms for reporting and responding to incidents.

b. First Nations Rights and Community Engagement

Suppliers must respect the rights, cultural protocols, and land rights of First Nations peoples. We require suppliers to:

- Seek to actively involve First Nations businesses and diverse local suppliers in your procurement activities.
- Contribute to initiatives that enhance community wellbeing, development, and reconciliation.

c. Diversity, Equity & Inclusion

Suppliers must foster an inclusive workplace and promote equal opportunity. We encourage:

- Inclusive policies governing recruitment and promotion that increases the representation of underrepresented groups.
- Ensuring products, services, and physical or digital environments are accessible to people of all abilities.

d. Grievance and Whistleblowing Mechanisms

Suppliers must maintain mechanisms that allow workers and contractors to report concerns, grievances, or suspected misconduct confidentially and without fear of retaliation. Reports must be appropriately investigated and addressed in a timely manner.

8. Environmental Responsibility

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

a. Compliance and Governance

Suppliers must comply with all applicable laws, regulations, and standards, including those relating to air quality, water pollution, waste management, hazardous materials, and climate change. You are required to:

- Obtain and maintain all necessary permits, licences, and authorisations, and to operate in full accordance with their conditions.
- Be prepared to disclose environmental compliance records or incident reports upon request.

b. Resource Efficiency and Waste Management

Suppliers are expected to implement practices to reduce the consumption of natural resources, this includes:

- Improving energy and water efficiency within operations.
- Prioritise waste avoidance, reduction and recycling over disposal.
- Ensuring the safe handling, storage, and legal disposal of all hazardous and restricted substances.

c. Climate Change and Carbon Reduction

Suppliers are expected to take measurable steps to reduce greenhouse gas emissions. We prioritise partners who:

- Track and report on carbon emissions where relevant to the contract scale.
- Implement energy efficiency initiatives and transition to renewable energy sources.
- Set ambition, commitments and targets in alignment with International and National emissions reduction targets.

d. Biodiversity and Ecosystem Protection

Suppliers must minimise their impact on natural habitats. This includes avoiding activities that harm endangered or threatened species and ensuring that products (such as timber or paper) are sourced from sustainably managed ecosystems

e. Supply Chain Sustainability

Suppliers must extend these environmental standards to their own supply chain. You are expected to assess environmental risks associated with your subcontractors and work collaboratively to improve the sustainability of the entire value chain.

9. Accountability & Reporting

Suppliers and employees may report concerns through **Stopline**;

- **Phone:** 1300 30 45 50
- **Email / Online:** pfb@stoline.com.au

People First Bank prohibits retaliation for good-faith reporting.

People First Bank may review supplier compliance through audits, questionnaires, or inspections. Suppliers are expected to take prompt corrective action where issues are identified.