

Supplier Code of Conduct

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Introduction

Claim Central procures a variety of goods and services from a diverse supplier base and looks to partner with suppliers who not only deliver quality products, superior service and value for money but who also share our commitment to acting with honesty and integrity and ensuring that business activities are conducted in full compliance with all applicable laws and regulations.

We require all suppliers who work with or for Claim Central to respect and adhere with the minimum requirements set out in this Supplier Code of Conduct.

The application of this Supplier Code of Conduct extends to the employees, agents and subcontractors of a supplier.

Business is conducted lawfully and with integrity

Compliance with laws & regulations

Suppliers are expected to fully comply with all laws and regulations applicable to them including all applicable international laws and regulations e.g. trade sanctions, import and export controls, transfers and reporting obligations, data protection and anti-trust/competition laws.

Conflicts of interest

Suppliers must declare all and any conflicts of interest in any business dealing with Claim Central that may affect commercial arrangements. This is a continuing obligation on a supplier that applies prior to entering into a business relationship with Claim Central, and then for the term of that relationship.

If there is any ownership or business interest in a supplier's business by a government official or political party representative or any Claim Central employee or contractor (past or present), then this must be declared by the supplier prior to entry into the business relationship.

Bribery & corruption

Suppliers must comply with all applicable anti-bribery and anti-corruption laws, and there is an absolute prohibition on any and all forms of bribery, corruption, extortion or embezzlement in relation to any and all dealings that may in any way involve Claim Central.

Specifically, suppliers must not (directly or through intermediaries) offer, make, solicit or accept any gifts, benefits, bribes or kickbacks, or offer or promise any personal or improper advantage, in order to obtain or retain any preferential treatment, improper advantage or benefit.

Suppliers must have in place adequate procedures to prevent bribery and corruption in the supplier's business relationships.

Financial records & money laundering

Suppliers must ensure that all business and commercial dealings with Claim Central are transparently performed and accurately recorded in the supplier's books and records – including expenses incurred, time records, payments made to others, and in relation to services rendered. There is zero tolerance for any actual or attempted money laundering.

Care of information and privacy

Claim Central requires its suppliers to comply with all laws and regulations relating to the privacy of personal information and have in place appropriate measures for employees to understand and comply with these laws and to keep Claim Central (and that of its customers) secure against unauthorised access or use.

Suppliers must also ensure they respect and safeguard the assets and information of Claim Central e.g. by adhering to confidentiality obligations and intellectual property rights.

Suppliers must not attempt to divulge to Claim Central any information about their competitors. Likewise, Claim Central's competitive and confidential information must not be shared with any third party unless expressly permitted by Claim Central.

Suppliers are required to immediately notify Claim Central if they suspect there has been inadvertent or unauthorised disclosure of any Claim Central information or personal information.

Quality & safety

All products and services delivered by a supplier must meet all legally required quality and safety standards.

Business continuity planning

Suppliers should have a business continuity plan and/ or disaster recovery plan that is maintained and tested to minimise business impacts in the event of a major disruption.



Employment practices

Suppliers are expected to comply with all applicable laws and regulations in relation to employment practices, including those designed to promote equal opportunity and which protects employees from unlawful discrimination, bullying, harassment and modern slavery.

Protecting the human rights of workers is not confined to the supplier's own employees, agents and contractors, but also to those workers within the supplier's own supply chain.

No discrimination

Claim Central has zero tolerance for unlawful discrimination and harassment.

Suppliers must ensure they treat all employees with respect and dignity, and that there is no discrimination in employment (including hiring, compensation, opportunities, discipline and termination) on the basis of irrelevant characteristics.

Diversity & inclusion

Suppliers should be committed to diversity and inclusion in its workplace and business practices, to ensure that all employees have equal access to opportunities at work, are treated with fairness and respect, and are not judged by unlawful or irrelevant reference to their attributes such as gender, race, colour, age, disability, sexual orientation, ethnic origin and religion.

The supplier should promote gender equality in its business, including equal participation of all genders and pay equality.

Modern slavery

The use of forced labour, whether in the form of compulsory or trafficked labour, indentured labour, bonded labour or other forms is not accepted by Claim Central.

Mental and physical coercion, slavery and human trafficking are prohibited.

Suppliers shall ensure that no exploitation of child labour or any other vulnerable group (e.g. illegal immigrants) takes place within their business or supply chain.

Working conditions

Suppliers must ensure that the working conditions for their employees meet or exceed the minimum legal standards or prevailing industry standard (whichever is higher) including in relation to their total compensation package (wages, overtime pay, benefits and paid leave) and the total number of hours (regular and overtime) to be worked.

The rights of employees to freedom of association and collective bargaining must be recognised and respected, and workers are not to be intimidated or harassed in the exercise of their right to join or refrain from joining any organisation.

Employees must have grievance mechanisms available to them.

Safety & health

Claim Central is committed to promoting a culture of health and safety awareness and practice in the workplace.

Suppliers are expected to:

- comply with all health and safety law and regulations.
- provide their employees with a safe and healthy workplace and take appropriate steps to identify, assess and manage workplace risk to protect employees from risk of accident and injury.
- ensure that employees are not subject to any physical, sexual, psychological or verbal harassment, abuse or other form of intimidation.
- provide appropriate training to employees to ensure they may perform their jobs safely.

Environmental management

Claim Central expects its suppliers to:

- comply with all applicable laws and regulations for the protection of the environment.
- demonstrate a clear understanding of the environmental risks, impacts and responsibilities associated with the goods and services they provide.
- operate with respect for the environment in their business operations.

Claim Central supports and encourages operating practices that are sustainable and looks for suppliers who are continuously seeking to improve the sustainability and efficiency of their operation, including in reducing waste, energy and water usage, and considering climate-related risks in their decision making.

Reporting concerns

If a supplier is aware of any failure to comply with this Supplier Code of Conduct (including any failure by a Claim Central employee, or anyone acting on behalf of Claim Central), then this should be reported to Claim Central as soon as possible. A failure to report will itself be a breach.

Actual or suspected breaches can be reported by suppliers (including their employees or contractors) to LegalNotices@claimscentral.com.au.

Claim Central prohibits any type of retaliation against suppliers (and their employees) who speak up and report actual or suspected breaches.

Compliance with Supplier Code of Conduct

Claim Central reserves the right to:

- carry out an assessment of the practices of a supplier to ensure alignment with this Supplier Code of Conduct.
- verify a supplier's compliance with this Supplier Code of Conduct, including requiring a supplier to submit third party audits or site visits.
- require a supplier to take corrective action if it is determined a supplier is not complying with this Supplier Code of Conduct.
- to terminate any agreement or business relationship it has with a supplier who does not comply with the Supplier Code of Conduct.

Suppliers are expected to be honest and open with Claim Central in response to any request for information, and to respond in full to any enquiry.