

**TEACHERS MUTUAL  
BANK LIMITED**

# SUPPLIER CODE OF CONDUCT

Date: 30 November 2024



TABLE OF CONTENTS

**Supplier code of conduct** ..... 3

1. APPLICATION OF THIS CODE ..... 3

2. COMPLIANCE WITH LAW AND REGULATIONS ..... 3

3. ETHICS & INTEGRITY ..... 3

4. RISK MANAGEMENT AND OUTSOURCING ..... 4

5. DATA SECURITY, PRIVACY AND CONFIDENTIALITY ..... 4

6. SUSTAINABILITY AND ESG ..... 5

**Reporting your concerns** ..... 6

**Corrective action process** ..... 6

# SUPPLIER CODE OF CONDUCT

## Our Commitment

At Teachers Mutual Bank Limited (TMBL), our purpose is banking for good, for those who do good. Our vision is to improve the financial wellbeing of our members and communities. We recognise that our suppliers play a crucial role in helping us achieve our purpose and vision. This Supplier Code of Conduct outlines the principles and standards we expect our suppliers to follow when conducting business with us or on our behalf.

We aim to deliver ethical and sustainable business practices that create value for our members, employees, and communities. We expect our suppliers to share this commitment and to implement these principles throughout their own operations and supply chains.

This Code applies to all suppliers, contractors, and third parties providing goods or services to TMBL, including their employees, agents, and subcontractors (collectively referred to as "suppliers").

If you have questions regarding this Code, or about our expectations of our Suppliers, please contact us at [VendorGovernance@tmbl.com.au](mailto:VendorGovernance@tmbl.com.au)

## 1. Application of this Code

The purpose of this Code is to set out TMBL's expectations for its suppliers. This Code applies to all suppliers of goods and services to TMBL, including their employees, agents, subcontractors, and affiliates. We expect our suppliers to align their business practices with this Code and to influence their own supply chains accordingly.

TMBL may report on suppliers' adherence to this Code through our annual report and Modern Slavery Statement.

Any supplier who suspects or becomes aware of unlawful, improper, or unethical behaviour can report it to:

- The relevant TMBL contact or contact us at [enquiry@tmbl.com.au](mailto:enquiry@tmbl.com.au) or [VendorGovernance@tmbl.com.au](mailto:VendorGovernance@tmbl.com.au); and/or
- The Australian Federal Police, if the behaviour involves bribery or corruption.

## 2. Compliance with Law and regulations

TMBL is committed to maintaining the highest standards of ethical conduct and legal compliance throughout our supply chain.

To support this commitment, we require our suppliers to adhere to the following principles:

- Comply with all applicable laws and regulations, including those related to bribery, corruption, money laundering, modern slavery, and prohibited business practices;
- Conduct business ethically, avoiding conflicts of interest that could bring TMBL into disrepute;
- Cooperate openly and honestly with audits, assessments, or reviews by governing bodies or TMBL;
- Identify and assess potential risks, develop emergency plans, and ensure business continuity; and
- Perform periodic evaluations of their facilities, operations, and those of their subcontractors as required.

## 3. Ethics & Integrity

To support this commitment, we require our suppliers to adhere to the following principles:

### **Ethical Business Conduct and Integrity**

- Conduct business ethically, fairly, and professionally, avoiding bias or unfair advantage;

- Maintain zero-tolerance for bribery and corruption, and promptly disclose conflicts of interest;
- Protect TMBL's intellectual property, maintain confidentiality, and keep accurate records; and
- Engage in responsible marketing and adhere to acceptable business practices with other suppliers.

#### **Ethical Leadership and Accountability**

- Establish policies committing to ethical conduct and implement processes to manage conflicts of interest;
- Take industry leadership in promoting ethical standards and practices; and
- Maintain confidential channels for reporting unethical behavior, ensuring protection from retaliation.

#### **4. Risk Management and Outsourcing**

TMBL expects suppliers to implement robust risk management processes and adhere to high standards when providing outsourced services, particularly for material business activities. This commitment ensures the resilience and reliability of our operations.

##### **Material Business Activities**

- Suppliers involved in critical operations as defined by APRA's Prudential Standard CPS 230 are expected to:
  - Implement effective risk management frameworks to identify, assess, mitigate, and monitor service-related risks;
  - Demonstrate robust governance, accountability, and proactive risk communication;
  - Ensure staff are appropriately skilled and qualified; and
  - Maintain comprehensive documentation of outsourcing arrangements and business continuity plans.

##### **Collaborative Risk Management**

We work collaboratively with our suppliers to enhance risk management practices. Suppliers are encouraged to:

- Engage openly on risk-related matters and seek guidance when needed;
- Participate in regular reviews and assessments of risk management processes; and
- Contribute to continuous improvement of risk management strategies in regular reviews and assessments of risk management processes.

#### **5. Data Security, Privacy and Confidentiality**

We expect our suppliers to protect the privacy and security of personal and sensitive information of our members, employees, and other stakeholders. This commitment to maintaining security, privacy, and confidentiality is crucial to our operations.

Suppliers must adhere to the following principles:

##### **Data Protection and Privacy**

- Comply with all applicable data protection and privacy laws and regulations;
- Only collect, use, and retain personal information for legitimate business purposes;
- Maintain the confidentiality of any non-public information regarding members, employees, and other stakeholders; and
- Ensure that any subcontractors or third parties engaged by the supplier adhere to the same data protection and privacy standards.

## Security Measures

- Promptly notify of any actual or suspected data breaches or security incidents involving the bank's data within 72 hours of discovery;
- Develop and maintain a comprehensive information security management system (ISMS); and
- Regularly conduct risk assessments and security audits to identify and address potential vulnerabilities.

## Transparency and Compliance

- Provide transparency regarding data handling practices and compliance measures; and
- Demonstrate ongoing commitment to data protection and privacy through regular reporting and audits.

## Confidentiality

- Suppliers must not improperly use any private, confidential, or commercially sensitive information in their possession relating to or in connection with their dealings with the bank. This includes refraining from sharing such information with unauthorized parties or using it for purposes outside the scope of the business relationship.

## 6. Sustainability and ESG

TMBL is committed to conducting business in an environmentally and socially responsible manner. We expect our suppliers to share this commitment, to collaborate with us and to implement sustainable practices in their operations and supply chains.

Suppliers must:

- Comply with all applicable environmental laws, regulations, and standards;
- Implement measures to reduce their environmental footprint, including energy consumption, greenhouse gas emissions, water usage, and waste generation; and
- Upon reasonable request, provide data on various sustainability and ESG issues, and specifically B Corp Certification requirements

### Labor Practices and Human Rights

TMBL expects suppliers to respect human rights in their operations and supply chains. Suppliers must:

- Prohibit the use of child labor, forced labor, and any form of modern slavery;
- Ensure fair working hours, pay (including meeting minimum wage requirements), and benefits;
- Provide safe work environments and allow freedom of association;
- Comply with modern slavery legislation, including any applicable local or national laws and promptly notify of any breaches; and
- Conduct human rights due diligence in their own supply chains.

### Environmental Responsibility

We encourage our suppliers to:

- Comply with environmental laws and maintain necessary permits and registrations;
- Implement measures to reduce environmental impact, including energy use, emissions, water usage, and waste; and
- Responsibly manage hazardous materials and support reporting of greenhouse gas emissions and energy consumption data.

### Diversity and Inclusion

We encourage our suppliers to:

- Foster an inclusive culture, promote diverse hiring practices, and create a discrimination-free environment;

- Support community engagement, commit to pay equity, and respect First Nations rights; and
- Consider subcontracting to stimulate First Nations business and economic development.

### **Conflict of interest**

TMBL believes that all business activities should be undertaken with impartiality and Suppliers must:

- Declare to the relevant Relationship Owner, under their contract, in relation to the goods or services being provided, any situation that raises an actual, potential or perceived conflict of interest related to or in connection with its dealings with TMBL; and
- Avoid financial, business or other relationships which may compromise the performance of their duties under their business arrangement with the TMBL. Under the TMBL Employee Code of Conduct, employees are expected to avoid actual, perceived and potential conflicts of interest wherever possible. Any conflicts of interest that cannot be avoided are expected to be declared and managed appropriately.

## **REPORTING YOUR CONCERNS**

You must promptly report any conduct that may not comply with this Code, regulations or internal policies to your Vendor Relationship Manager or the Vendor Governance team. All suspected non-compliance will be treated seriously and investigated by TMBL. It is expected that reports of non-compliance are truthful and contain accurate facts. If an investigation reveals non-compliance, appropriate corrective action will be taken.

You can report your concerns to your Vendor Relationship Manager, or send an email to the Vendor Governance team, [VendorGovernance@tmbl.com.au](mailto:VendorGovernance@tmbl.com.au).

## **CORRECTIVE ACTION PROCESS**

Suppliers are expected to self-assess their compliance with the Code and take timely action to correct any deficiencies or breaches reported or identified by an audit, assessment, inspection, investigation or review. Suppliers are encouraged to raise any concerns, discuss and seek clarification accordingly to any elements of the Code please contact us at [VendorGovernance@tmbl.com.au](mailto:VendorGovernance@tmbl.com.au)

If requested Suppliers must provide evidence and confirmation of their compliance with the Code, including the provision of documents and records that support their compliance. Suppliers are expected to support TMBL in reviewing compliance with the Code.