



Credit Corp Group

**SUPPLIER
CODE OF
CONDUCT**

October 2024

SUPPLIER CODE OF CONDUCT

Our Values

Credit Corp is Australia's largest provider of sustainable financial services in the credit-impaired consumer segment, and has offices located across the globe including the United States, New Zealand, and the Philippines.

We are committed to providing sustainable and responsible financial solutions for our customers with the goal of improving their financial situation. We are committed to conducting all aspects of our business in a sustainable and ethical manner. We aim to achieve this by consistently applying our values.

Our values include *doing the right thing, accountability and transparency*. These values support our commitment to ethical and sustainable dealings, including respecting and advancing human rights to support an environment in which all customers, communities and people can prosper. We consistently apply our values across all jurisdictions in which we operate.

We choose to partner with suppliers who share our values. Through this Supplier Code of Conduct ('code'), we share our values and commitments with our suppliers, and clearly articulate the standards of conduct we expect suppliers to adhere to within their operations and supply chains.

We will work collaboratively with suppliers to develop a clear understanding of our values and expectations to support suppliers' consistent adherence to the code.

We reserve the right to verify compliance with the code. Suppliers must cooperate and provide information and supporting evidence which we consider is reasonably necessary to evidence compliance.

Notwithstanding any term of a supplier contract, we reserve the right, in the case of serious or repeated contraventions of the code, to terminate the supplier contract upon reasonable notice, without penalty. We will act reasonably at all times in exercising such a right.



Our Values

This is what we believe in



Discipline

Doing the right thing

Discipline means setting standards and adhering to our controls to ensure that those standards are always achieved.

Accountability

Making it happen

Accountability is all about delivering the right results by taking responsibility for setting targets and measuring outcomes.

Transparency

Being open and honest

Transparency means being open and honest in all that we do, drawing attention to challenges and problems in our business, so that we can overcome them.



Social

Human Rights and Labour Practices

Credit Corp is committed to respecting and advancing human rights for all workers and contractors, as well as all individuals and communities who are affected by our activities and those of our supply chain.

We recognise that human rights are universal and fundamental rights that preserve the inherent freedoms, dignity and equality of all human beings.

We expect all suppliers to share our commitment to protecting and advancing human rights, irrespective of where in the world they operate. All suppliers must:

- Comply with all applicable human rights related laws in respect of employees and business operations in every jurisdiction in which Credit Corp or the supplier operates.
- Conduct business activities in a way which respects human rights, and is in accordance with the *Guiding Principles on Business and Human Rights*¹ published by the United Nations.
- Treat all employees and contractors with respect, providing a safe and fair working environment in which employees are free from discrimination, harassment, abuse, bullying and victimisation, and which respects the right of freedom of association and collective bargaining.
- Not tolerate or support the use of any forced, bonded or compulsory labour and any other form of modern slavery within their operations or supply chains.
- Not tolerate or support child labour within their operations or supply chains that deprives a child of their childhood, potential or dignity, or which may cause detriment to their physical or mental health or development. All employees and contractors of the supplier must meet the minimum age for employment requirements set out under the International Labour Organisation ('ILO') standards.²

¹ Available at https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr_en.pdf

² Available at <https://www.ilo.org/global/standards/introduction-to-international-labour-standards/lang--en/index.htm>



Credit Corp Group

- Provide all workers with a clearly written contract of employment outlining the worker's pay, method of pay, terms of employment and key employee rights, prior to entering the employment relationship.
- Permit all workers to leave their employment upon giving reasonable notice.
- Not charge workers recruitment fees, require workers to lodge deposits or identity papers or make threats of denunciation to immigration authorities.
- Provide workers with fair pay, leave entitlements, benefits and working conditions that, at a minimum, meet the requirements under any applicable legislation in the relevant jurisdiction.
- Not require workers to work excessive hours, provide leave and adequate breaks and ensure that regular working hours do not exceed 48 hours per week.
- Immediately report any contravention of these obligations to Credit Corp.

Work Health and Safety

We are committed to providing an environment that supports the health and safety of our workers, contractors, customers, visitors and suppliers.

All suppliers must:

- Comply with all applicable legislation relating to work health and safety in the relevant jurisdiction in which they operate.
- Meet good industry practice with respect to work health and safety. As a minimum, suppliers must provide training to all employees and contractors to enable them to perform their work safely, provide a safe and hygienic working environment, and implement and maintain controls that support accident prevention and minimise health and safety risks.
- Ensure that first aid and other emergency equipment is in place and that necessary training and resourcing is provided to effectively manage safety incidents.
- Maintain any insurance to cover employees in relation to work health and safety incidents in line with any legislative or contractual obligations.
- Immediately report any contravention of these obligations to Credit Corp.



Diversity and Inclusion

Credit Corp is committed to creating an environment in which all people feel valued and respected and have the best possible chance to succeed. We recognise the benefits of a diverse workforce, valuing employees and utilising their talents, expertise and experience to the fullest, and ensuring that all employees respect individual differences.

In line with this commitment, we are driven to provide employees with a fair, flexible and safe working environment that includes a workplace free from harassment, bullying and discrimination. We expect our suppliers to share our commitments.

All suppliers must:

- Implement and maintain policies, procedures and training to ensure compliance with relevant legislation in relation to anti-discrimination and anti-harassment, and equal employment opportunity.
- Treat employees fairly and ensure that all recruitment, performance evaluation, remuneration, promotion or access to opportunity, is based wholly on merit.
- Promote an inclusive and respectful workplace in which race, religion, gender, age, sexual orientation, pregnancy or potential pregnancy, maternity and/or disability are no impediment to recruitment, promotion, ongoing employment, or other opportunities.
- Be committed to monitoring and eliminating gender pay gaps where they exist within its operations.
- Immediately report any contravention of these obligations to Credit Corp.

Indigenous Rights

Credit Corp is committed to protecting and promoting the rights of indigenous peoples within each jurisdiction that we operate. We expect our suppliers to share that commitment.

All suppliers must:

- Respect and protect the rights of indigenous peoples.
- Respect traditional knowledge and cultural expression belonging to Aboriginal and Torres Strait Islander people.
- Ensure that their operations and supply chains do not result in the forced removal of indigenous populations from their lands, territories or waters.
- Recognise the right to Free, Prior and Informed Consent ('FPIC')¹ as recognised by the United Nations declaration of the Rights of Indigenous Peoples, where supply chain decisions may effect indigenous people or their territories.
- Immediately report any contravention of these obligations to Credit Corp.

¹ See <https://www.un.org/development/desa/indigenouspeoples/publications/2016/10/free-prior-and-informed-consent-an-indigenous-peoples-right-and-a-good-practice-for-local-communities-fao/>

Environment

Environment

Credit Corp is committed to reducing its environmental footprint and playing its part in limiting climate change. This commitment includes selecting suppliers who share those aims and procuring goods and services that have the least possible negative environmental impact.

All suppliers must:

- Meet all applicable environmental protection laws, regulations and standards.
- Take active steps to minimise the negative impact of its operations, goods and services on the environment, including minimising pollution, waste and carbon emissions.
- Seek ways to maximise the efficient use of energy, water, resources and raw materials.
- Immediately report any contravention of these obligations to Credit Corp.

Compliance and Governance

Compliance with Local Laws

Credit Corp takes its compliance obligations seriously and values its reputation for compliance and sustainability that we have cultivated. We are committed to comply with all applicable laws, relevant guidelines and industry standards. We expect our suppliers to share those values.

All suppliers must:

- Comply with all applicable laws, regulations and relevant guidelines or industry standards by which it or Credit Corp is bound in relation to the goods and services supplied.
- Closely monitor compliance with its obligations to detect and remediate breaches.
- Immediately report any contravention of these obligations to Credit Corp.

Responsible Sourcing

Credit Corp takes all reasonable steps to ensure that participants in its supply chain act ethically and in accordance with all applicable laws. Credit Corp expects its suppliers to share this commitment.

All suppliers must conduct appropriate due diligence as is necessary to reasonably ensure that raw materials contained in the products they produce do not directly or indirectly assist organisations or individuals connected with human rights abuses, money laundering, terrorism or other illicit or unethical activities.



Integrity and Conflicts of Interest

To support Credit Corp's commitment to ethical conduct and to protect both Credit Corp's and the supplier's reputation, all suppliers must act ethically, honestly and transparently in their dealings.

Suppliers must implement and maintain policies and controls to eliminate unethical practices, including bribery, corruption or other illegal activities.

The supplier must comply with all applicable laws related to anti-corruption, including, without limitation, the *Australian Criminal Code Act 1995 (Cth)*, the *United States of America Foreign Corrupt Practices Act 1977*, the *United Kingdom Bribery Act 2010*, the *Philippines' Anti-Money Laundering Act 2001*, *New Zealand's Crimes Act 1961*, and any other applicable law or rule which has the objective of preventing corruption.

No supplier may offer, give, nor receive gifts, entertainment, sponsored travel nor any other benefit or inducement which could improperly influence, or be perceived to improperly influence, the outcome of any business transactions between the supplier and Credit Corp, or be perceived to create a conflict of interest, or secure any improper advantage of any kind.

Any breach of this clause must be immediately raised with Credit Corp's company secretary, or reported through Credit Corp's whistleblower procedures as set out in this code.

Sanctions

All suppliers shall ensure that, to the best of their knowledge, neither they, nor any of their subsidiaries, directors, officers, employees, agents, representatives, contractors or suppliers is an individual or entity that is, or is owned or controlled by, a person that is the subject of sanctions. The supplier:

- Must not engage in any activity which, to the best of its knowledge, would cause Credit Corp to be in breach of any sanction.
- Must not engage in any activity or transaction with any person, or for the benefit of any person, who is designated by a relevant sanctions authority.
- Will immediately report any contravention of these obligations to Credit Corp's company secretary, or report such contravention through Credit Corp's whistleblower procedures as set out in this code.



Safe and Responsible Artificial Intelligence

This section applies if the Supplier is the provider of products or services that use or incorporate Artificial Intelligence ('AI'), or if AI is used within the Supplier's supply chain to support the services.

As part of our commitment to ethical business practices, Credit Corp requires all suppliers to adhere to safe and responsible AI principles aligned with international standards, including the OECD AI Principles and Australia's AI Ethics Principles. These principles are designed to ensure AI technologies contribute to human, societal, and environmental well-being, benefiting individuals, society, and the environment.

Suppliers must integrate these principles throughout the lifecycle of AI systems and ensure the principles are embedded within its supply chain.

Human, societal and environmental well-being: AI systems should benefit individuals, society and the environment.

Human-centred values: AI systems should respect human rights, diversity, and the autonomy of individuals.

Fairness: AI systems should be inclusive and accessible and should not involve or result in unfair discrimination against individuals, communities or groups.

Privacy protection and security: AI systems should respect and uphold privacy rights and data protection, and ensure the security of data.

Reliability and safety: AI systems should reliably operate in accordance with their intended purpose.

Transparency and explainability: There should be transparency and responsible disclosure so people can understand when they are being significantly impacted by AI and can find out when an AI system is engaging with them.

Contestability: When an AI system significantly impacts a person, community, group or environment, there should be a timely process to allow people to challenge the use or outcomes of the AI system.

Accountability: People responsible for the different phases of the AI system lifecycle should be identifiable and accountable for the outcomes of the AI systems, and human oversight of AI systems should be enabled.

Suppliers must establish risk based governance processes to ensure that it meets the AI Principles, and impose equivalent standards on their supply chain.



Privacy

Credit Corp is committed to respecting the privacy rights of all individuals and takes those obligations seriously. We expect our suppliers to share our commitment.

From time to time, suppliers may have access to personal information about Credit Corp's customers, employees and others. When handling such information, suppliers must:

- Respect the privacy rights of all individuals and take appropriate steps to protect personal information from unauthorised access, use or disclosure.
- Comply with all applicable privacy laws by which they or Credit Corp is bound.
- Handle personal information in a transparent way and make their privacy policy freely available to individuals at no cost.
- Maintain processes and controls whereby individuals may complain about the handling of their personal information.
- Respond to complaints about privacy within the timeframe prescribed by legislation or contract.
- Notify Credit Corp of any breaches of its obligations under this clause immediately upon becoming aware of them.

Raising Concerns

Credit Corp is committed to the highest standards of ethical, moral and legal business conduct. Supporting this commitment, and Credit Corp's values, a whistleblower policy is in place, providing a process whereby company officers, employees, suppliers, supplier employees, individuals associated with Credit Corp or any relative, spouse or dependent of the foregoing may raise serious concerns in relation to misconduct or suspected misconduct, including those relating to modern slavery, whether on an identified or anonymous basis and with the reassurance that they will not suffer detriment for reporting their reasonable suspicions.

A copy of Credit Corp's whistleblower policy will be made available to all suppliers during the contracting process and may be requested by contacting Credit Corp's Company Secretary.

Training

For the code to be effective in delivering the outcomes it seeks to achieve, all suppliers must provide appropriate training to their relevant employees and contractors in the obligations of the code. Training should occur at least once annually. Such training may be incorporated as part of a broader training package, provided it covers all obligations under the code.



SUPPLIER CODE OF CONDUCT

Amendment

Credit Corp may (acting reasonably) amend this code from time to time as reasonably necessary to respond to legislative changes, areas of increased compliance risk, changes in community expectations, or to enhance consumer, community or other stakeholder outcomes.

Any changes to the code will be notified to suppliers and published on our [website](#).

Last updated – October 2024



Credit Corp Group