

Supplier code of conduct



This Supplier Code of Conduct communicates Acenda's expectations of our suppliers and their supply chains in providing goods and services to our business.

General expectations of suppliers

Nippon Life Insurance Australia and New Zealand Limited, trading as Acenda, expects all suppliers to comply with the commitments and values listed in this Code, and to work with us in meeting these obligations.

Acenda expects all suppliers to comply with all applicable laws and regulations and promptly respond to any breaches. If a supplier is unable to comply with the expectations set out in this Code, they must contact their Acenda representative.

About us

Acenda combines over 135 years of Australian heritage with ambitious plans for future growth. With the strong support of Nippon Life Group, one of the world's largest life insurers, we're committed to growing to meet the changing needs of you and your clients, giving more Australians the confidence to take life on.

To deliver on this commitment, we seek to build relationships with suppliers who operate in a fair, ethical, and responsible manner. We believe these behaviours form the foundations of sustainable business practice. By integrating them into our procurement processes, we can manage risks and promote positive social, environmental and economic outcomes for the broader community.

We will seek to continuously improve our procurement practices, with the objective of identifying, mitigating, and eliminating risk to deliver sustainable life insurance to our customers and partners.

Application and scope

This Code applies to all suppliers who provide products or services to Acenda and is incorporated in the contract documents for each supplier. In the event of any inconsistency, the terms of the relevant contract shall apply. The application of this Code does not extend to Acenda's group and retail insurance partners or debt protection partners, who are governed by separate arrangements.

Acenda reserves the right to update this Code as required. It also applies to Acenda's supplier selection process. The Code operates alongside, and is subject to, existing laws and regulations, and in no way limits suppliers' rights and obligations under such laws and regulations, either in Australia or abroad.

Sustainable supply chain management

Sustainable supply chain management represents an opportunity for us to deliver positive social, environmental, economic, and governance impacts through our procurement processes.

We view sustainable practice as a responsibility that extends to all our suppliers, and seek to ensure they acknowledge this responsibility and appropriately self-manage their compliance with this Code. Acenda may request evidence of compliance.

Labour rights

Protections for employees

Acenda expects that responsible employment and workforce practices are consistently applied across an organisation's operations. Suppliers must ensure that any applicable local and national laws are recognised and applied, including in relation to employment practices, human rights, anti-discrimination, health and safety, and modern slavery.

In respect to their own operations, as well as those forming their supply chain, we expect our suppliers to:

- Ensure reasonable steps are taken to facilitate a fair and equitable working environment that's free from any form of harassment or discrimination based on, but not limited to, age, disability, nationality, racial or ethnic origin, gender, sex, gender identity, sexual orientation, pregnancy, marital or relationship status, family or carer responsibilities, or political or union affiliation.
- Ensure all employees are legally entitled to work and that no form of modern slavery is used, including human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage, or child labour. If a supplier becomes aware that any of the above has occurred, they must notify their Acenda representative.
- Ensure compliance with minimum wage payments and maximum working hours. If no legislation or other requirements governing these matters are in place, a supplier must ensure wages and hours correspond with experience and industry standards.
- Ensure employees are provided with freedom of association and, where supported by relevant legislation, the right to collectively bargain. Where no such legislation exists locally, appropriate channels should be made available to employees for discussion and recourse on employment-related issues.

Information security

Information security and data privacy

Acenda is committed to maintaining the security of our customers' data. We expect our suppliers, as applicable, to comply with all relevant data protection laws, obligations, and contractual requirements to keep our data secure from unauthorised use and access.

Our suppliers must:

- Contractually agree to adhere to information security standards equivalent to Acenda's, which may include annual security assessments.

- Immediately notify Acenda of any information security breach, cyber incident, or unauthorised disclosure upon becoming aware of the event. Suppliers must also notify Acenda of any known security control weakness or failures as soon as possible and no later than 72 hours from the time of discovery.
- Notify Acenda if any information (including backups) is to be stored offshore or be accessible by offshore entities. This extends to supplier partners and providers.

Responsible practices

Human rights and modern slavery

Acenda recognises that human rights are universal and fundamental rights that preserve the inherent freedom, dignity, and equality of all human beings.

Our suppliers must respect the International Bill of Human Rights and other international standards. Suppliers must take action to identify, manage, and eliminate modern slavery practices from their operations and supply chains.

Workplace safety and wellbeing

Acenda expects our suppliers to share our commitment to wellbeing and safety. This includes working in ways that minimise and reduce the impacts to health while actively promoting wellbeing for all employees and others who could be affected by their activities.

Diversity and inclusion

Acenda strives to be a leader in, and advocate for, workplace diversity and inclusion. We seek to integrate diversity and inclusion into the way we work, and expect our suppliers to do the same. We engage with suppliers who actively promote and support these values in their own workplaces and supply chains.

Supply chain diversity

Acenda seeks to engage a diverse supplier base that includes Indigenous-owned businesses, women-owned businesses, and social and disability enterprises. We encourage our suppliers to share this commitment in their own supply chains.

Environmental protections

Acenda requires our suppliers to adhere to relevant laws, regulations, and standards relating to environmental protections. We expect our suppliers to actively manage the environmental impact of their operations, demonstrating a commitment to following environmentally sustainable practices and minimising negative environmental outcomes.

Corporate governance

Acenda recognises corporate governance to be about promoting fairness by setting out responsibilities of our board, shareholders, employees, and suppliers. A robust corporate governance structure is critical for mitigating sustainability impacts to our organisation.

Economic and trade sanctions

We expect our suppliers to ensure that their activities comply with regime sanctions implemented under Australian sanctions law; these currently include Australia's Autonomous Sanctions Regime and the United Nations Security Council (UNSC) Sanctions Regime. Our suppliers must ensure that their activities do not involve, either directly or indirectly, a prescribed sanctioned person, entity, or country under such a regime.

Conflicts of interest

We expect our suppliers, their employees, and related parties to avoid any situation which could create, has the potential to create, or could be perceived to create, an incentive for that individual or party to act in a way that is not in the best interests of Acenda, our customers, or shareholders.

If a supplier considers that an actual, potential, or perceived conflict of interest may exist, they must immediately disclose the matter to their Acenda representative and document how the conflict will be appropriately controlled or avoided. We will assess the conflict, form a view on how the conflict should be managed, and communicate this to the supplier.

Bribery and corruption

Acenda has zero tolerance for bribery, corruption, or any criminal and unethical behaviour, irrespective of jurisdiction. We expect our suppliers, their employees, and related parties to comply with all applicable international, Commonwealth, and state-based laws and regulations in relation to anti-bribery and anti-corruption.

Bribes, kickbacks, pay-offs, secret commissions, and any like payments (including facilitation payments) are strictly prohibited. Suppliers must not engage in any behaviour that may be perceived as avoiding or bypassing anti-bribery and anti-corruption laws.

Efficient invoicing and payment

Acenda seeks to support efficient invoicing and payment for our suppliers.

We expect our suppliers to issue invoices within the agreed timelines, to ensure the content of invoices is true and correct (including Purchase Order numbers), and to respond to any queries raised by us as quickly as possible.

Reporting breaches of the Code

Acenda expects suppliers to notify their representative, or the Acenda Confidential Alert Line, of any instances of non-compliance with, or suspected breaches of, this Code.

Where a notification is made through the representative, they will liaise with the supplier to understand the nature of the breach and use best commercial efforts to work towards achieving an acceptable remediation.

Suppliers wishing to make a notification through the Acenda Confidential Alert Line may do so using the details below:

1800 953 954

SpeakUp.Acenda@coreintegrity.com.au

More information

If you would like further information, or to provide feedback, please contact **procurement@acenda.com.au**