

Supplier Code of Conduct

Netwealth Group Ltd
ABN 84 620 145 404
Level 6/180 Flinders Street
Melbourne VIC 3000
PO Box 336
South Melbourne VIC 3205

Approved and adopted by:

- Netwealth Group Limited (NGL) (ABN 84 620 145 404) on 2 March 2022

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1 Document overview

1.1 Introduction

Netwealth Group Limited and its subsidiary companies (Netwealth) are committed to promoting and supporting the creation of ethical Supply Chains. We believe in the importance of working collaboratively with our stakeholders and have created this Supplier Code of Conduct to share the minimum ethical standards and behaviours expected of our Suppliers. We look forward to working alongside and engaging Suppliers who share our values.

This Code applies to all Suppliers engaged by Netwealth. Suppliers are requested to read, understand and use best endeavours to enable their business and their Supply Chains to meet the expectations listed in this Code. The expectations in this Code are not intended to alter or override any legal or regulatory requirement that the Supplier must comply with, nor to alter or override any contractual obligations between Netwealth and our Suppliers.

1.2 Definitions

Term	Definition
Improper Conduct	Includes any of the following, but is not limited to the following: <ul style="list-style-type: none"> • Illegal activities (theft, fraud, bribery, corruption, drug use, violence, sexual harassment and property damage); • Unsafe work practices (discrimination, bullying), either in Netwealth or in their underlying supply chains; • Intentional regulatory breaches • Regulatory breaches where you believe Netwealth Management or R&C or the Board are unaware of or may not be being handled correctly; • Misconduct, unethical conduct or policy violations; or • Deliberate concealment of the above.
Modern Slavery	Contemporary form of slavery where offenders exploit victims and undermine their freedom.
Netwealth	Includes Netwealth Group Limited and/or one or more its subsidiary companies.
Personally Identifiable Information (PII) Data	Any information provided by Netwealth to a Supplier which is related to an identified or identifiable natural person. Examples include, but are not limited to; <ul style="list-style-type: none"> • Full name • Date of birth • Address • Email address • Phone number • Financial information e.g. bank or credit card details • Sensitive information e.g. health, religion or political status, ethnicity/race or gender • Identity information e.g. passport, Tax File Number (TFN) or gender
Services	Activities which are offered by a Supplier without transferring the ownership of a product.
Supplier	A third party who supplies a Good or Service to Netwealth.
Supply Chain	The network which allows for the flow of Goods and Services to be produced and distributed between businesses.

Worker Includes employees, agents or contractors who work for, or with, a Supplier.

2 Supplier requirements

2.1 Human rights & modern slavery

Netwealth does not tolerate any form of exploitation through modern slavery, servitude, human trafficking or any type of forced or compulsory labour. We expect our Suppliers to uphold the human rights of their workers and local communities, and to comply with all relevant laws relating to human rights.

Netwealth expects that its Suppliers should:

- **Uphold fair, safe and decent working conditions for employees** including compliance with local occupational health and safety laws and regulations;
- **Not engage in any modern slavery practices** including the use of forced or child labour, human trafficking or debt bondage, forced marriage or deceptively recruiting workers for labour or Services;
- **Ensure all workers are engaged voluntarily** and that they are free to terminate their employment in accordance with local laws and regulations;
- **Respect freedom of association and the right to collective bargaining** by not preventing workers from joining or forming trading unions or engaging in collective bargaining as well as acting in accordance with local laws and regulations;
- **Uphold fair employment standards** by complying with all local laws and regulations relating to fair working hours and wages, superannuation, benefits, leave entitlements, public holidays and compensation insurance for workers;
- **Comply with international human rights and** not engage in any conduct which is inconsistent with established international human rights, such as the United Nations' Guiding principles on Business and Human Rights;
- **Uphold equal treatment** by ensuring they have an equal opportunity workplace that is non-discriminatory, inclusive and free from harassment and bullying. Suppliers should not discriminate on the basis of gender, race, religion, age, disability, sexual orientation, national origin or any other protected characteristics under local laws and regulations. Netwealth encourages Suppliers to promote inclusion and diversity within their own internal and external operations; and
- **Put measures in place to prevent inhumane treatment** including, but not limited to, corporal punishment, physical, mental or sexual abuse or any form of exploitation. Suppliers must ensure all workers are treated with respect and dignity.

2.2 Environment & community

Netwealth is committed to sustainable business practices and respecting communities, and we expect our Suppliers will:

- **Work to avoid environmental harm** by identifying and mitigating potential environmental hazards arising out of their business activities;
- **Comply with relevant environmental laws as applicable to their business;** and
- **Respect cultural heritage** of Indigenous communities.

2.3 Governance and ethical practices

Netwealth expects Supplier's to conduct their business in a lawful, ethical, and fair manner and to:

- **Comply with relevant laws and regulations;**
- **Put in place controls which mitigate fraud, bribery, and corruption;**
- **Avoid illegal or unethical activity;** and
- **Conduct themselves in an appropriate manner** that is fair, professional and will not bring their supplier partners into disrepute.

2.4 Data protection and privacy

Netwealth is committed to protecting the data of our clients and employees, and we expect our Suppliers to:

- **Take reasonable steps to protect the personal data** of our clients, advisers, stakeholders, and employees;
- **Comply with relevant privacy, consumer protection and data handling laws;**
- **Ensure appropriate data protection controls are in place** that are commensurate to the size of the Supplier and which are adequately implemented and managed; and
- **Communicate data breaches or weaknesses to Netwealth** so that both parties can work together to protect the interests of our clients, advisers, stakeholders, and employees.

2.5 Conflicts of interest

Netwealth requires its Suppliers to take all reasonable steps to avoid actual, potential, or perceived conflicts of interest when engaging with Netwealth. If a conflict occurs, we expect that the Supplier will contact Netwealth to work through the matter together. For such notifications, please email compliance@netwealth.com.au.

2.6 Whistleblowing & complaints

Netwealth is committed to creating open and transparent channels of communication with our stakeholders, including our Suppliers. For any questions about this document or to work through concerns that you may have, please contact our Supplier and Corporate Sustainability team:

Governance Manager
Netwealth Investments Limited
PO Box 336
South Melbourne VIC 3205
Email: csr@netwealth.com.au

If you wish to make a complaint about Netwealth (including its products and services), these can be raised by email, telephone or in writing to:

The Complaints Manager – Investor Services
Netwealth Investments Limited
PO Box 336
South Melbourne VIC 3205
Freecall: 1800 888 223 (within Australia)
Email: complaints@netwealth.com.au

Alternatively, if you have identified or are concerned about Improper Conduct within Netwealth, then we encourage you to report it to inconfidence@netwealth.com.au. If you wish to remain anonymous, please refer to the Netwealth Group Whistleblowing Policy available on our Corporate Website under 'About Us' and 'For Shareholders'.