

Supplier Code of Conduct

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Netwealth Group Limited

Approved and adopted by:

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

Ongoing approval delegated to the People & Corporate Sustainability Committee (PCSC).

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1 Document overview

1.1 Purpose

Netwealth Group Limited and its subsidiary companies (collectively, Netwealth) are committed to promoting and supporting the creation of ethical Supply Chains. This commitment is driven by the same shared values that guide Netwealth’s business: curious, optimistic, courageous, collaborative, agile and genuine¹. We believe in the importance of working collaboratively with our stakeholders and have created this Supplier Code of Conduct (the Code) to share the minimum ethical standards and behaviours expected of our Suppliers. We have developed this Code in consideration of the United Nations (UN) Declaration of Human Rights, and it supports our response to the Modern Slavery Act, 2018 (Cth).

1.2 Scope

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 meet the requirements outlined in this Code. Suppliers are required to communicate this Code to related entities, suppliers and subcontractors who support them in supplying to Netwealth, so that these parties are aware of, understand and comply with this Code.

1.3 Definitions

Term	Definition
Employee	A person who is employed by Netwealth.
Good(s)	Physical, material, and tangible property.
Modern Slavery	Modern slavery is the serious exploitation of a person’s human rights and freedoms. It is defined by a range of practices that include human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and the worst forms of child labour.
Netwealth	Includes NWL and/or one or more its subsidiary companies.
Personally Identifiable Information (PII)	Any information, or an opinion related to, an identifiable or reasonably identifiable person. <ul style="list-style-type: none"> For the avoidance of doubt, PII includes Sensitive Information, tax file numbers and government Identifiers (such as driver’s licence number, Medicare number, etc).
Service(s)	Activities which are offered by a Supplier without transferring the ownership of a product.
Sensitive information	PII that includes information or an opinion about an individual’s: <ul style="list-style-type: none"> Racial or ethnic origin; Political opinions or associations; Religious or philosophical beliefs; Trade union membership or associations; Sexual orientation or practices; Criminal record; Health or genetic information; and Some aspects of biometric information. <p>Generally, sensitive information has a higher level of privacy protection than other personal information.</p>
Supplier	A third party who supplies a Good or a Service to Netwealth.

¹ <https://www.netwealth.com.au/web/about-netwealth/our-people/>

Supply Chain	The network which allows for the flow of Goods and Services to be produced and distributed between businesses.
Universal Declaration of Human Rights	The Universal Declaration of Human Rights is an international document adopted by the United Nations General Assembly that enshrines the rights and freedoms of all human beings. https://www.un.org/en/about-us/universal-declaration-of-human-rights
International Labour Organisation (ILO) Conventions	The ILO is a United Nations agency whose mandate is to advance social and economic justice by setting international labour standards. https://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang-en/index.htm
The United Nations (UN) Guiding Principles on Business and Human Rights	The UN Guiding Principles on Business and Human Rights are a set of guidelines for States and companies to prevent, address and remedy human rights abuses committed in business operations. https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf
Worker	Includes employees, agents or contractors who work for, or with, a Supplier.

2 Supplier requirements

2.1 Human Rights & Modern Slavery

Netwealth supports fundamental human rights as set out in the Universal Declaration of Human Rights and core International Labour Organisation conventions. We recognise the responsibility of business to respect human rights in line with the UN Guiding Principles on Business and Human Rights.

Netwealth does not tolerate any form of exploitation through Modern Slavery. We require 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's Suppliers are required to:

- 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. Suppliers must 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 require our Suppliers to:

- 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 requires 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 Netwealth into disrepute.

2.4 Data protection and privacy

Netwealth is committed to protecting the data and Personal Information of our clients and Employees. Suppliers are required to:

- Take reasonable steps to protect the Personal Information 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 comply with relevant law and 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 require the Supplier to contact Netwealth to work through the matter together. For such notifications, please email csr@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:

Sustainability Analyst
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 any suspected or actual misconduct or improper state of affairs in relation to Netwealth, then you can submit a Whistleblower Disclosure report on our webpage, including anonymously, at <https://www.netwealth.com.au/web/about-netwealth/whistleblower/>. For more information, please refer to the Netwealth Group Whistleblower Policy available from this webpage.