

Westpac Group Supplier Code of Conduct

May 2026

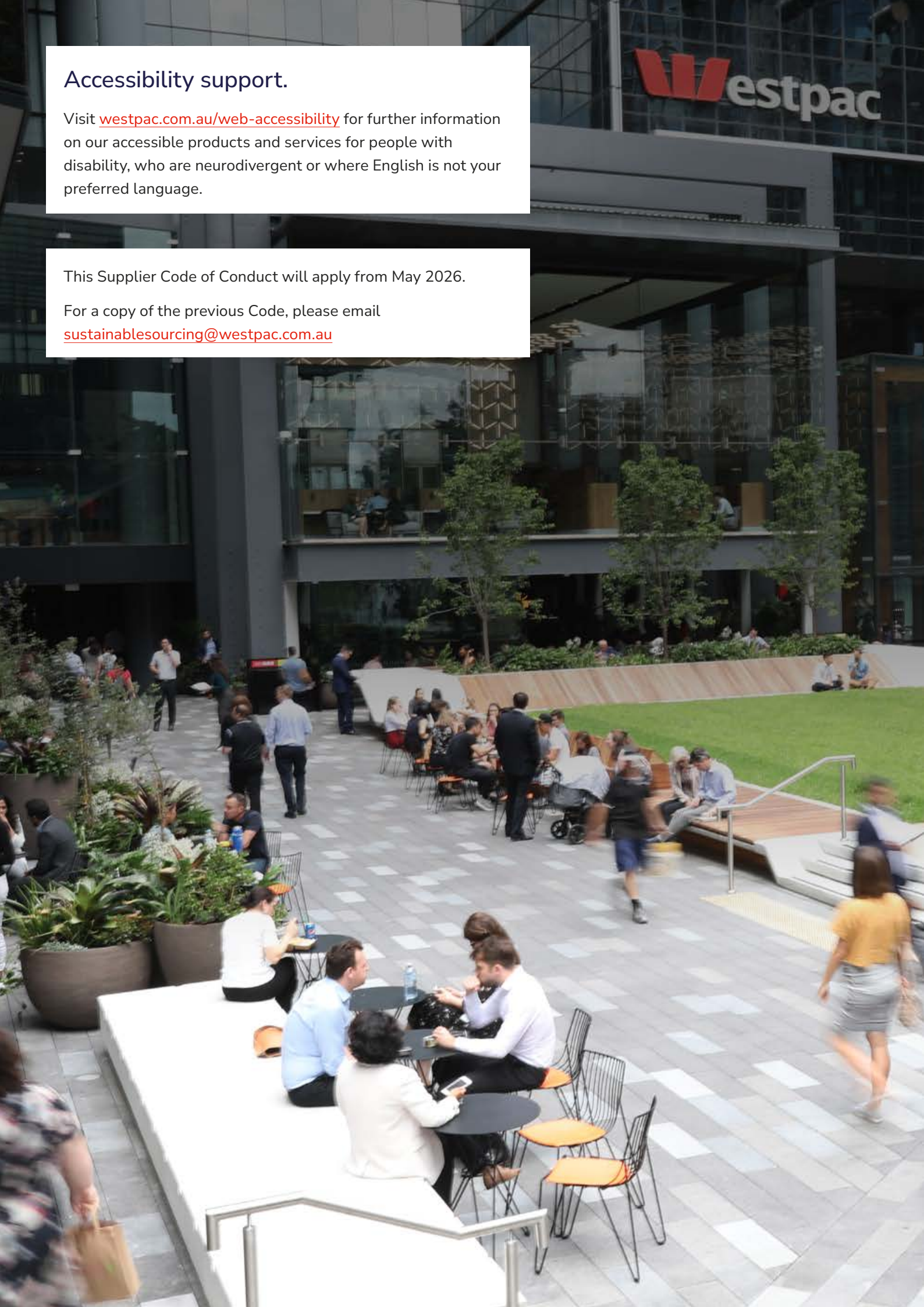


Accessibility support.

Visit westpac.com.au/web-accessibility for further information on our accessible products and services for people with disability, who are neurodivergent or where English is not your preferred language.

This Supplier Code of Conduct will apply from May 2026.

For a copy of the previous Code, please email sustainablesourcing@westpac.com.au



SUPPLIER CODE OF CONDUCT

Westpac has been backing people, businesses, communities and ideas for more than 200 years. We continue to adapt and evolve and are committed to delivering on our **Purpose** of **Taking action now to create a better future**.

A future where ethical and sustainable business practices are embedded across our operations and supply chain, and where diverse and traditionally under-represented groups are supported to reach their full potential.

Westpac's Code of Conduct guides everything we do. It describes the standards of conduct we expect and outlines how we make decisions every day to deliver on our Purpose including asking the question "Should we"?

We are also guided by our Sustainability Strategy, our Positions and our Action Plans. We seek to support the delivery of the UN Sustainable Development Goals and align to the UN Global Compact, OECD Guidelines for Multinational Enterprises amongst other frameworks and initiatives.

We value suppliers who share our Purpose and strengthen our commitments to operate in an ethical, social and environmentally responsible manner.

This Supplier Code of Conduct ('Code') outlines our expectations of suppliers and subcontractors providing goods and services to, or on behalf of Westpac.

IMPLEMENTATION

Our goal is to collaborate with our suppliers to help them meet the requirements of this Code and to seek continuous improvement.

Suppliers are required to ensure their employees and supply chain engagements meet the expectations outlined in this Code and notify Westpac of any suspected or actual breaches within their operations or supply chain.

Suppliers are required to comply with Westpac's screening and due diligence activities which may include providing relevant documentation of policies and processes, providing reasonable access to service provider premises, completing audits and acting promptly to address any issues identified.

We acknowledge that environmental, social and governance risks vary depending on a supplier's industry and structure and understand that compliance with the Code will be in accordance with their specific level of risk. Where we identify that a supplier's practices are inconsistent with our expectations, where appropriate, we seek to use our leverage and influence, including through engagement with the supplier, to address the issue and improve outcomes for people and the environment. Westpac is committed to working with our suppliers to enable them to implement the most suitable measures.

EXPECTATIONS



Compliance with laws & regulations.

- Comply with all relevant local, national and international laws and regulations, including in relation to:
 - Bribery and corruption
 - Human rights and labour rights, including modern slavery and the direct or indirect employment of children
 - Work, health and safety management and reporting
 - Environmental management and reporting

Ethical and transparent business practices.

- Act ethically and transparently, avoid conflicts of interest with Westpac and have a policy or process which commits employees to ethical conduct. Westpac has a zero-tolerance approach to bribery and corruption and requires suppliers have processes in place to report unethical behaviour.
- Have ethical and fair conduct within their own supply chain including issuing timely payments and not enforcing unfair contract terms on suppliers.



Gifts & Hospitality.

- Suppliers should not offer or accept gifts or hospitality that could be perceived as influencing decisions and must conduct themselves with honesty, integrity and transparency.



Operational Resilience.

- Identify, mitigate and manage risks, vulnerabilities and compliance including risks to people and the environment.
- Relevant service providers*, are expected to:
 - Have documented and regularly reviewed and tested business continuity and technology recovery plans to maintain and recover business operations in the event of a disruption
 - Manage risk in their supply chains
 - Provide applicable information to support Westpac's governance and reporting activities
- Consider the climate resilience of their operations, supporting Westpac's ambition of building a climate-resilient bank.



Data Privacy and Information Management.

- Protect our business and customer information and handle information in accordance with all applicable legal and regulatory requirements.
- Ensure appropriate management systems and effective security measures commensurate to the criticality and sensitivity of the information are in place to protect business and customer information against loss, unauthorised access and misuse.

* Relevant service providers are material service providers as identified and notified by Westpac and are expected to support Westpac's operational resilience objectives including applicable regulatory obligations such as CPS230 – Operational Risk.



Human Rights.

- Respect all human rights, including labour rights, in its operations, supply chain and other business relationships and address any adverse human rights impacts. This includes respect for internationally recognised human rights as set out in the International Bill of Human Rights (consisting of the UN Universal Declaration of Human Rights and the two main instruments through which it has been codified, being the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights) and the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work.
- Allocate adequate resources to identify, manage and remediate human rights and modern slavery risks and impacts as guided by the UN Guiding Principles on Business and Human Rights (UNGPs).

Occupational Health and Safety.

- Develop and maintain a health and safety statement or policy and have appropriate systems and processes to monitor, manage and record health and safety risks and incidents for your direct and indirect employees, customers and stakeholders.

Employment practices and labour rights including Modern Slavery.

Employment Practices.

- Take all reasonable steps to ensure all employees in its operations and supply chain are legally entitled to work and provided with fair working conditions and legally required wages and entitlements.
- Ensure any outsourcing or subcontracting arrangements, visa holder employment or recruitment agencies used within the supply chain, respect human rights, promote fair working conditions and are not complicit with modern slavery.

Modern Slavery.

- Ensure that policies and procedures are in place, guided by the UNGPs, to identify, prevent, mitigate, address and remediate any form of modern slavery within their operations or supply chain, including:
 - Human trafficking
 - Slavery
 - Servitude
 - Forced labour
 - Bonded labour
 - Deceptive recruitment
 - Forced marriage, and
 - The worst forms of child labour

Child Labour.

- Implement appropriate age verification, ensure no children are subject to extensive working hours or work that interferes with their education and ensure no children under the age of 18 undertake hazardous work.
- Suppliers set clear expectations within their own supply chains and subcontracting relationships regarding the prohibition of child/underage labour and children performing hazardous work.

Freedom of Association.

- Ensure workers' rights to freedom of association and collective bargaining are respected in your operations and supply chain.
- Uphold open communication between workers and management to address workplace concerns effectively.

Anti-discrimination.

- Treat all employees fairly, ethically, respectfully and with dignity and have protections against direct and indirect discrimination, bullying and harassment.



Foster an inclusive and diverse workforce and supply chain.

- Foster an inclusive workforce where all employees feel valued, respected and safe and embrace people of all ages, cultural background, disability, ethnicity, sex, gender identity, marital or family status, religious belief, sexual orientation or socio-economic background, perspective, and experience.
- Create opportunities and engage diverse suppliers in the delivery of goods and services to Westpac.
- Where applicable, suppliers should build partnerships with the communities in which they operate to support local and Indigenous communities. For more information on Westpac's approach to reconciliation, see our [Reconciliation Action Plan](#).

Accessibility.

- Design products and services that meet the accessibility needs of our customers and employees, including accessible and inclusive digital communication channels, premises, banking tools and services. For more information on Westpac's approach to accessibility see our [Access and Inclusion Plan](#).

Employee development and training.

- Provide employees and relevant contractors with appropriate training to perform their duties and to ensure the necessary skills and awareness to comply with the expectations outlined in this Code.



Environmental Management.

- Maintain an environmental management system and/or process appropriate to reduce their material environmental risks and impacts.
- Identify, measure, monitor and manage environmental impacts associated with their operations and supply chain, including:
 - Greenhouse gas (GHG) emissions
 - Biodiversity and deforestation
 - Energy use
 - Transport fuel consumption
 - Water and wastewater
 - Waste and hazardous materials
 - Product lifecycle impacts

Greenhouse Gas emissions.

- Minimise greenhouse gas emissions associated with products and services provided.
- Provide greenhouse gas emission data for inclusion within Westpac's Scope 3 inventory when requested.
- As applicable, disclose climate related data and transition strategies to net zero.

Biodiversity and natural capital.

- Be conscious of their dependency on nature and seek to minimise their impact on critical habitat.
- Identify opportunities for nature positive outcomes and regeneration.
- Identify and apply circular economy principles to products.
- Source or supply credible third-party certified products relevant to their offering. For example, sustainable forestry certification for paper and timber products.

SPEAKING UP AND WHISTLEBLOWING

Suppliers should have a confidential complaints channel for whistleblowing and/or escalation process for employee complaints and grievances within their organisation and processes for investigating and remediating any allegations and/or incidents which ensures no retaliation.

Westpac encourages our suppliers and sub-contractors to speak up where they suspect wrongdoing within any relationship with Westpac or have a concern about the conduct of any of our representatives in our operations or supply chain.

Westpac is committed to protecting anyone reporting wrongdoing. If suppliers, including their current or former employees, have knowledge of, or reason to suspect any reportable conduct which involves Westpac, we encourage them to report it as soon as possible through our dedicated whistleblowing channels.

Our confidential Speak Up reporting system can be accessed via westpac.whispli.com/whistleblowing or by calling a dedicated 24-hour independent Whistleblower Hotline: 1800 989 569 (an Australian free-call number), which is operated by a third party.

The telephone numbers for the 24-hour independent Whistleblower Hotline available in other jurisdictions are set out in our [Speaking Up Policy](#).

Need more info?

For further information on Westpac's commitments to its suppliers and how to do business with us, please visit 'Your Supplier Advocate' page at: westpac.com.au/contact-us/your-supplier-advocate

For further information on our sustainability commitments please visit: westpac.com.au/about-westpac/sustainability



Westpac acknowledges the Traditional Owners as the custodians of this land, recognising their connection to land, waters and community. We pay our respects to Australia's First Peoples, and to their Elders, past and present.