Westpac’s Sustainable Supply Chain Management Code of Conduct

Policy owner: Group Procurement, Group Property, Operations and Procurement
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1. Introduction

The Westpac Banking Corporation (Westpac) has a long and proud history. Established in 1817, Westpac is Australia’s first and oldest bank, and its first and oldest company.

Our suppliers are important in our sustainability performance and should be viewed as partners in our sustainability journey. We take great care in selecting those who supply us directly with products and services, and expect each of them to share our commitment to best practice and continuous improvement as well as operate to internationally recognised standards and appropriate codes of practice.

For this reason we ask our suppliers to comply with our Sustainable Supply Chain Management (SSCM) Code of Conduct (the Code). The Code sets out Westpac’s expectations of suppliers. This is the second, updated version of our Code, first published in 2008.

The Code draws on overarching principles of the United Nations Global Compact (to which Westpac is a signatory), the Global Reporting Initiative’s reporting guidelines (GRI), Dow Jones Sustainability Index review criteria, subject matter experts, non-government organisations (NGOs), suppliers and literature on best practice. The Code encompasses a number of social, economic and environmental topics. These cover public reporting, labour/workplace management, Occupational Health and Safety (OHS), risk management, environment, carbon, corporate governance and ethics, supply chain, community, accessibility and indigenous inclusion.

Westpac considers SSCM as a roadmap or checklist that helps us to identify where our suppliers stand in terms of their sustainable business practices. This helps Westpac to work with our suppliers to make progressive improvements that are appropriate for their business. The Code provides a basis for how we plan to work with suppliers who make genuine efforts to improve their performance over time. We also encourage our suppliers to influence their own supply chains in a similar manner.

It is important to recognise that the Code is a living document, and over time as leading practices becomes the expected standard, our expectations of suppliers are likely to similarly evolve.

a. Tailoring our Code of Conduct to our suppliers

The SSCM Code of Conduct is implemented through a SSCM due diligence process, comprising of an SSCM Scoping Survey and an SSCM Assessment. Westpac has a wide range of suppliers and our SSCM due diligence process tailors the requirements that we expect of our suppliers’ particular characteristics. This helps to ensure that questions are mapped to the level of a supplier’s specific sustainability risk.

For example, smaller vendors assessed as having low sustainability risk are either not required to complete an online SSCM Assessment, or may be asked to answer only a minimum set of questions. Larger vendors assessed as having higher sustainability risk and no reporting against recognised frameworks will be answering a larger and broader set of questions.

In addition to tailoring our topic areas to suppliers, we also recognise that every supplier is different. Therefore, our goal is to work collaboratively with our suppliers to make progressive improvements that are appropriate for their organisation.
To assist this process, we have chosen to assign differing levels of priority to our questions. We have grouped questions according to whether they are ‘Mandatory Actions’ or ‘Preferred Actions’.

Our ‘Mandatory Actions’ include actions that we consider important to address before we enter into a contractual relationship with a supplier, or within the first year of the contract. Our ‘Preferred Actions’ are not mandated but we strongly encourage our suppliers to adopt best practice over the course of the contract:

**Westpac’s Code of Conduct: Action priority**

![Diagram of action priority levels]

- **Complying with Westpac’s SSCM Code of Conduct**

We embed SSCM into our supplier relationships using contractual arrangements. We ask suppliers to comply with a number of minimum requirements. This relates to local and national laws and regulations pertinent to their operations, in all jurisdictions from which they provide goods or services to Westpac, and relevant international standards. Westpac will not enter into an agreement with suppliers who do not satisfy these requirements from the outset of contract negotiations.

Suppliers must comply with the Code which is implemented through an SSCM due diligence process.

Suppliers must within 30 days of a written request from Westpac complete the SSCM Scoping Survey and, where applicable, the SSCM Assessment.

During the term of any supplier agreement with Westpac which is limited to no more than once per calendar year, Westpac may request the Supplier to complete subsequent SSCM Scoping Surveys and, where applicable, the SSCM Assessments.

If there are areas identified for improvement through the SSCM assessment, Westpac may require the supplier within such reasonable time as Westpac may specify, to submit to and obtain Westpac’s approval for, a plan which sets out remediation steps to be undertaken by
the supplier to achieve compliance with any requirements specified in the SSCM Assessment by agreed dates (Action Plan).

If supplier fails to complete a remediation step set out in the Action Plan by the dates specified in that Action Plan, Westpac may give supplier a notice identifying the relevant failure and requiring supplier to complete the remediation step within 30 days (Rectification Period).

If supplier does not complete the relevant remediation steps within the Rectification Period, Westpac may notify supplier that it is prepared to grant an extension of the Rectification Period, subject to such terms as Westpac may reasonably specify, including by:

a. requiring that further discussion of progress against the Action Plan take place between the parties’ relationship managers or senior management; and

b. ceasing to order further products and/or services from the supplier pending receipt of evidence reasonably satisfactory to Westpac that supplier has implemented the relevant remediation steps.

Within 5 days of the end of each quarter or at such other intervals as may be agreed between the parties, supplier must submit a report to Westpac on the actions it has taken to implement the remediation steps in an Action Plan.

Westpac may verify a supplier’s compliance with the SSCM Code of Conduct. Westpac may use external and internal auditors to verify our suppliers’ operational practices.

Westpac may use supplier compliance with SSCM to inform the supplier’s potential as a Westpac business partner.

### Demonstrating compliance with the Code of Conduct

A number of Code of Conduct actions ask for management systems that measure, improve and communicate to interested parties the environmental, safety, health and labour performance of the organisation’s operations in a systematic way. Management systems may include the following:

- **Policies.** A policy is a statement of the aims and principles of an organisation in relation to its overall performance, and gives rise to objectives and targets. A good policy is comprehensive (covering all significant issues and impact areas); commits the company to principles supported by the Board/executive; sets out its scope clearly (e.g. Australia/global); and may reference how the organisation will meet any relevant legislative requirements.

- **Performance objectives, targets and implementation plans, and measures/processes for assessing the organisation’s performance against the objectives.

- **Identification of an organisation’s representative(s) responsible for implementation of the relevant programs.

- **Systems to track, communicate and train employees on relevant laws and regulations.

- **Procedures for periodic assessments to ensure compliance with applicable legislation, and to correct any deficiencies identified.

- **Process(es) for clearly communicating the organisation’s work practices and expectations to workers, suppliers and Westpac upon request.

When we request evidence of compliance with the Code, we look for documentation that supports this. **Examples** include:

- Certificates evidencing achievement of a standard

- Sustainability reports
d. More information


Useful sites to refer to about corporate citizenship and sustainability include:
- UN Global Compact: www.unglobalcompact.org
- World Business Council for Sustainable Development: www.wbcsd.com
- Network for Business Sustainability: http://nbs.net/
- Business in the Community: www.bitc.org.uk
- Forum for the Future: http://www.forumforthefuture.org/

e. Contact us

SSCM Team
Email: sscm@westpac.com.au
2. Public Reporting

Preferred Actions

We encourage suppliers to undertake public reporting of sustainable business practices. A reporting process signals to stakeholders and the market the importance the organisation places on transparency and disclosure. Organisations are provided with a unique opportunity to inform stakeholders about their approach to sustainability issues and update them on the progress made in the management of sustainability issues.

Westpac recognises that different sized organisations, in different industry sectors, may have constraints that determine the nature of these reports. However, to meet the requirement for public reporting, information must be available externally, and (preferably) be validated independently. Even small companies can look to publicly report through additional information in Annual Reports, annual or bi-annual Stakeholder and Social Impact Reports, and online reporting.

We encourage adoption of the Global Reporting Initiative (GRI) which has developed globally applicable sustainability reporting guidelines for voluntary use by organisations for reporting on economic, environmental, and social dimensions of activities, products, and services.

We tailor the questions we ask of suppliers depending on their practices in the following:
- Reporting to GRI G3/3.1 to a B+ or A+ level
- Reporting to GRI G4 at a comprehensive level with an auditor assured report. We ask suppliers if they report on economic, environmental, social, labour practices and decent work, human rights, society and product responsibility as material aspects.
- Externally reporting sustainability data that is verified by an independent assessor
- Externally reporting sustainability data that is in an integrated report within the annual report or a sustainability report and certified or assured to a recognised framework or standard, eg. AA 1000, ISAE3000.

More information

Useful sites to refer to about public reporting of sustainable business practices include:
- Global Reporting Initiative (GRI): www.globalreporting.org
- Integrated reporting: http://www.theiirc.org/
- Accountability (AA1000): www.accountability.org.uk
- Social Accountability International: http://www.sa-intl.org/
- ISO26000 on social responsibility: http://www.iso.org/home/standards/iso26000.htm
- Global Social Compliance Programme: http://www.gscpnet.com/
- CDP reporting: https://www.cdp.net
- CSR Reporting: http://www.csreporting.com/
- International Corporate Sustainability Reporting: www.enviroreporting.com
3. Labour/workplace management

The OECD has argued that strengthening core labour standards,¹ and promoting labour participation from within currently underrepresented groups,² can increase economic efficiency by raising skill levels and by creating an environment that stimulates innovation and higher productivity. Westpac aims to action these values internally through its 2017 Sustainability Strategy³ and also, with the willing support of suppliers, throughout its supply chain.

Westpac considers that providing workers with core labour standards, inclusive employment policies, a safe and healthy working environment and practices which ensure fair treatment are fundamental human rights.

Westpac expects our suppliers to share our commitment to human rights and fair employment practices in accordance with existing international standards such as the UN Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the ILO Declaration on Fundamental Rights at Work, the UN Convention on the Rights of the Child and UN Women’s Empowerment Principles.

Mandatory Actions

Our suppliers must ensure that they do not participate in child labour, forced or involuntary labour or otherwise breach employment laws and regulations including laws regarding minimum wages, discrimination, harassment and bullying.

The supplier must provide Westpac with relevant information relating to any regulatory enforcement action for non-compliance with employment laws.

Suppliers must take action in the following areas within the first year of contractual relations:

- Provide evidence if the organisation’s labour/workplace practice is in line with ISO26000, SA 8000 or similar and independently audited/certified.
- Have written labour/workplace management policies and standards in place.
- Strive to provide a workplace free of direct or indirect discrimination, harassment or bullying on the grounds of gender, age, race, nationality or ethnic origin, disability, family responsibilities or parental status, marital status, the occupation of spouse or partner, medical or irrelevant criminal record, political convictions, pregnancy or potential pregnancy, religious beliefs or activities, sexual preference or sexuality, industrial activity or union membership, physical appearance, social origin or carers responsibilities.
- Provide fair pay and working conditions, including adequate rest periods and leave entitlements (including annual leave, sick leave and parental leave), comply with local laws and match prevailing working conditions.
- Give consideration to the needs of, risks to and requests made by employees, as a stakeholder in the operation of the business.

Preferred Actions

We encourage our suppliers to take action in the following areas:

- Provide an anonymous process for "concern reporting" by employees
- Commit to relevant training, learning and development opportunities for employees.
- Put a documented policy and system in place to manage:
  - Workforce diversity and flexibility. This may include age diversity and the participation of youth and employees aged 50+; people with disability; Indigenous Australians; gender equity; and LGBTI inclusion, supported by workplace flexibility
  - Grievances raised by employees regarding their employment
  - Equal remuneration for women and men
  - Retention and deployment/secondment
  - Temporary employees (for example contractors, casual employees etc.)
  - Flexible work practices.

More information on labour

Useful sites to refer to labour and human rights include:

- ILO conventions (including prohibition of child labour, forced labour and the ILO Declaration of Fundamental Principals and Rights at Work): [www.ilo.org](http://www.ilo.org)
- UN Global Compact: [www.unglobalcompact.org](http://www.unglobalcompact.org)
- Australian Council of Trade Unions (ACTU): [www.actu.asn.au](http://www.actu.asn.au)
- New Zealand Council of Trade Unions: [www.union.org.nz](http://www.union.org.nz)
- Amnesty International Australia: [www.amnesty.org.au](http://www.amnesty.org.au)
- Social Accountability International: [http://www.sa-intl.org](http://www.sa-intl.org)
- ISO 26000 - Social responsibility: [http://www.iso.org/iso/home/standards/iso26000.htm](http://www.iso.org/iso/home/standards/iso26000.htm)
4. Occupational Health and Safety (OHS)

Westpac expects suppliers to commit to maintaining and improving the work environment so that it is safe and healthy for all staff, contractors and visitors, with policies and programs that go beyond legislated requirements.

Mandatory Actions

Before entering into any contractual relationship, we ask our suppliers to ensure that they are compliant with all relevant local and national laws and regulations with respect to occupational health and safety and the provision of health related benefits to employees. The supplier must provide information if they have been fined or convicted of an occupational health and safety offence within the past five years, and information if currently subject to any regulatory enforcement action for non-compliance with safety legal requirements.

Preferred Actions

We encourage our suppliers to take action in the following areas:

- Certify the supplier’s health and safety management system by a recognised independent authority (eg. SafetyMAP, AS/NZS 4801, OHSAS 18001, OSH 2001)
- Have written safety and health policies and standards in place
- Have a documented system to reduce work-related injury and illness including regular health and safety inspections at all worksites
- Provide all employees with income or health benefits. This could include, (but is not limited to):
  - Superannuation/pension plans
  - Health insurance
  - Medical care for employee families
  - Accident insurance
  - Disability insurance
- Report (at least annually) on health and safety performance to external stakeholders, via formal reports (Annual, Sustainability or Stakeholder Impact), internet based information, or another written report format readily available on request

More information

Useful sites to refer to on health and safety requirements in Australia and New Zealand:

- New Zealand Government Occupational Safety and Health Service: [www.osh.govt.nz](http://www.osh.govt.nz)
5. Risk Management

A sound risk and compliance management framework and effectively managing risks is core to Westpac. As such, we need to ensure key suppliers are effectively managing their risks which could impact on the services provided to us. We work with our material and major suppliers closely on these issues to ensure compliance with regulatory requirements. More generally, Westpac expects suppliers to develop a robust and documented risk management framework which incorporates social, ethical and environmental risks.

Preferred actions

We encourage our suppliers to take action in the following areas:

- Have in place a written and periodically tested Business Continuity Plan (BCP) in place to minimise business impacts in the event of a major disruption.
- Have in place a written and periodically tested Emergency Response Plan (ERP) in place to minimise harm to employees, the local community and local environment (including buildings) in the event of a site disaster.
- The supplier has measures in place to ensure the security of customer information.

More information

Useful sites to refer to on risk management, BCPs, ERPs and security of customer information:

- AusCERT - Australia's National Computer Emergency Response: www.auscert.org.au
- Centre for Disease Control and Prevention (US): www.bt.cdc.gov
6. Environment

Westpac’s suppliers are expected to provide products or services to Westpac and to conduct their business operations in a way that protects and sustains the environment. We therefore expect our suppliers to equally engage in an environmentally responsible and efficient manner of working, and to make best efforts to minimise adverse impacts on the environment, in order to jointly make a difference to our environment.

We encourage suppliers to set environmental targets, report publicly on environmental indicators, conduct independent audits against appropriate standards or certification schemes and offer environmental friendly alternatives. We encourage suppliers to take responsibility for their products, processes and services throughout their lifecycle, including product stewardship and extended product responsibility.

Mandatory actions

Westpac requires our suppliers to ensure, before we enter a contractual relationship, that they are compliant with all relevant local and national laws and regulations with regard to land and water management, waste and recycling, the handling and disposal of toxic substances, discharges and emissions, noise, transportation of products, waste etc.

The supplier must provide any information if they are currently subject to any regulatory enforcement action for non-compliance with environmental legal requirements.

Preferred actions

We encourage our suppliers to take action in the following areas:

- Hold an Environmental Management System certified to ISO14001, EMAS or an equivalent standard
- Have a written environment policy
- Have a written environmental management plan to identify, measure, monitor and minimise the impact of their activities on the environment. The plan may consider (but is not limited to): paper sourcing, business travel, environmentally friendly information and communication technology (ICT), recycling, energy use and source, carbon emissions, waste and recycling, employee commuting, use of materials in the manufacturing process, take back programs etc.
- Have current actions, strategies and future plans for managing resource scarcity issues such as biodiversity, water scarcity and food security. This includes procuring agricultural commodity inputs (such as soy, palm oil and timber) from sustainable, and where possible certified sources, demonstrate a focus on resource efficiency, especially energy efficiency and consider carbon neutrality if appropriate to a recognised independent standard.
- Report (at least annually) on environmental performance to external stakeholders, via formal reports (Annual, Sustainability or Stakeholder Impact), internet based information, or another written report format readily available on request.
7. Carbon

Measurement, management and disclosure of greenhouse gas emissions and climate change related data is an increasingly important aspect of standard business practice. Westpac is keen to work with suppliers who are committed to reducing their carbon emissions and intensity. We ask our suppliers about the legislative environment(s) applicable to the organisation, and if there are carbon related mechanisms that will impact the products/services delivered to Westpac.

Westpac is also keen to understand if suppliers are able to offer products/services which reduce emissions, have a lower carbon intensity or which address long term climate change impacts. In this case, our expectation is that our suppliers will share information on actual or potential emission reduction options available to Westpac.

Preferred actions

We encourage our suppliers to inform us if the organisation:

- Has products/services impacted as a result of operating in any jurisdictions subject to a carbon or greenhouse gas emission mechanism (eg. carbon pricing, emissions trading scheme, greenhouse gas emissions reporting requirements, emissions performance standards etc)
- Whether carbon costs incurred are passed through to customers via pricing structures or contractual arrangements
- Is likely to be subject to increasing costs as a result of the carbon intensity of the product/service offered
- Provides lower carbon intensity alternatives within their product/service offering
- Provides products/services which incorporate or address longer term climate change adaptation measures.

More information

Useful sites to refer to on environment and carbon issues:

- CDP reporting: [https://www.cdp.net](https://www.cdp.net)
- UN Global Compact: [www.unglobalcompact.org](http://www.unglobalcompact.org)
- DJSI reporting: [www.sustainability-indices.com](http://www.sustainability-indices.com)
- Programme for the Endorsement of Forest Certification: [http://pefc.org/](http://pefc.org/)
8. Corporate governance and ethics

Westpac expects suppliers to demonstrate a commitment to take account of their own responsibilities, and with an overall philosophy, approach and policies complementary to our own. We work with suppliers to establish management systems (policies, plans, accounting and reporting mechanisms, and performance measures) which provide for compliance assurance and continual improvement, have an employee code of conduct, and that report externally on social, ethical and environmental performance.

Mandatory Actions

Westpac requires our suppliers to ensure, before we enter a contractual relationship, that they are compliant with all laws and regulations on bribery, corruption and prohibited business practices.

Preferred Actions

We encourage our suppliers to take action in the following areas:

- Have written corporate governance policies/standards
- Have written corporate responsibility/sustainability policies/standards
- Have a code of conduct on ethics and business conduct (eg. covering bribery, corruption, fraud)
- Provide employee training on business ethics and conduct
- Monitor compliance with its code of conduct (or any similar policy)
- Provide a formal complaints management process for employees, suppliers and members of the communities in which they operate or provide services to
- Have an effective and transparent allocation of responsibilities between Board and management, where an applicable organisational structure exists
- Promote timely and balanced disclosure of material matters concerning services provided by the company to Westpac.

More information

Useful sites to refer to on corporate governance and ethics:
- Public Concern at Work: [www.pcw.co.uk](http://www.pcw.co.uk)
9. Supply Chain

The management of risks and opportunities in the supply chain is critical because of issues that may arise in relation to corporate reputation and trust, brand image, customer acquisition and retention, supply chain security and competitiveness.

Westpac encourages suppliers that set out social, ethical and environmental objectives and/or targets for their suppliers, and screen and monitor suppliers on this basis.

Preferred Actions

We encourage our suppliers to take action in the following areas:

- Have a system/management procedure in place to ensure similar principles to Westpac’s supplier assessment are adopted with their own key suppliers (which may include high spend, high risk or strategic suppliers)
- Adhere to acceptable business practices with their own suppliers, including providing for timely payment and reasonable contractual conditions
- Document contingency plans in the event that labour rights concerns are identified in their supply chain
- Have a supplier diversity policy and or strategy. This may include but is not limited to:
  - Indigenous enterprise
  - Disability Enterprise
  - Social enterprise
  - Women owned enterprise

We require further information if suppliers provide products to Westpac or to Westpac customers that include “conflict minerals” (cassiterite, columbite-tantalite/coltan, gold and wolframite and three derivatives: tin, tantalum and tungsten) from the Democratic Republic of Congo.

More information

Useful sites to refer to on supply chain and diversity:

- Supply Nation [www.supplynation.org.au](http://www.supplynation.org.au)
- National Minority Supplier Development Council: [www.nmsdc.org](http://www.nmsdc.org)
10. Community

Westpac believes every company has a responsibility to the local communities where they have an impact and from which they profit. Westpac seeks to understand the issues facing the communities in which it operates, and we endeavour to conduct business in a way that builds social capital, and achieves a positive impact. We believe that community partnerships can drive innovation resulting in longer term social and financial benefits.

We encourage suppliers to share this philosophy, as demonstrated by engagement with community stakeholders and long term, strategic involvement in community partnerships to address key social issues.

Preferred Actions

We encourage our suppliers to take action in the following areas:

- Have a written policy for community involvement and/or positive social impact
- Ensure that the supplier’s community involvement policy aligns with core business strategy, business risks or core capabilities
- Systematically manage impacts on the local communities in which suppliers operate
- Take a systematic approach to community involvement. This may include (but is not limited to):
  - Employee programs (volunteering etc.)
  - In-kind donations of products/services
  - Partnering/collaborative programs
  - Financial contributions
- Systematically assess or measure the inputs and outputs of any community involvement/investment activity and, more critically, social impact and benefits
- Report (at least annually) on social performance to external stakeholders, via formal reports (Annual, Sustainability or Stakeholder Impact), internet based information, or another written report format readily available on request.

More information

Useful sites to refer to on community:

- LBG global standard for measuring and benchmarking corporate community investment: [www.lbg-australia.com](http://www.lbg-australia.com)
- Volunteering Australia: [www.volunteeringaustralia.org](http://www.volunteeringaustralia.org)
11. Accessibility

Westpac encourages our suppliers to grow their commitment to developing their own diverse and accessible work places, products and services, for their employees and customers.

We strongly encourage companies to provide an environment in which customers with a disability have equitable access to products and services. In addition, employees should be chosen on the basis of being the best person for the job based on merit, whether that person has a disability or not. Similar standards should be applied to our suppliers’ own suppliers.

Preferred Actions

We encourage our suppliers to develop an accessibility policy and or strategy covering employees, customers and the provision of inclusive products/services to the broader community.

More information

Useful sites to refer to on accessibility:
- The Australian Network on Disability (AND) is a not-for-profit organisation resourced by its members to advance the inclusion of people with disability in all aspects of business: [http://www.and.org.au/](http://www.and.org.au/)
12. Indigenous Inclusion

As Australia’s first bank and one of its largest corporations, Westpac believes we have a responsibility to use our skills and partnerships to help Aboriginal and Torres Strait Islander customers, communities and people to prosper and grow. As part of our Reconciliation Action Plan, we are focusing our energy in four areas where we believe we can make the most sustainable difference:

- Financial inclusion
- Strong and thriving communities
- Meaningful careers
- Recognition and advocacy.

In order for us to recognise positive steps taken towards Indigenous inclusion, we encourage suppliers to capture investment in these areas and inform Westpac of such initiatives. To support this commitment to financial inclusion and supplier diversity, we will assist our suppliers with identifying, utilising and fostering Indigenous tier 2 suppliers (those suppliers that provide products/services to our direct, tier 1, suppliers).

We believe that together, Westpac and its partners can achieve great results for Aboriginal and Torres Strait Islander people through this collaboration and ideas sharing.

We encourage our Australian based suppliers to share this focus. Developing a Reconciliation Action Plan can be helpful in setting out aspirations and practical actions to build strong relationships with Aboriginal and Torres Strait Islander customers, communities and people.

We also encourage our internationally based suppliers to take similar steps as appropriate in their country of operation.

Preferred Actions

We encourage our suppliers to identify opportunities for promoting strong and thriving communities, meaningful careers and financial inclusion of Aboriginal and Torres Strait Islander communities and people.

More information

Useful sites to refer to on indigenous inclusion: