



# **Singtel Group Supplier Code of Conduct (SCC)**

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## 1. Introduction

As a leading telecommunications organisation, the Singtel Group recognises that the social and environmental performance of our business, our customers and our suppliers, play a significant role in our long-term success. We are committed to understanding and minimising the social and environmental consequences of our business operations. This commitment extends to the procurement of products and services.

The Singtel Group looks to collaborate with transparent, ethical, environmentally and socially responsible suppliers. Although we recognise our suppliers are independent entities, their conduct has the potential to reflect on the Singtel Group. Due to the nature of our relationship with our suppliers, it is Singtel's expectation that our suppliers will adhere to the minimum standards set out in this Singtel Supplier Code of Conduct (SCC).

The provisions of this SCC set forth the expectations of all suppliers with whom the Singtel Group does business. Singtel expects these principles apply to licensees, retailers, suppliers, parent entities and subsidiary or affiliate entities, as well as all others with whom they do business including employees, subcontractors and other third-parties. The Singtel Group expects all suppliers to communicate this SCC to their employees, subcontractors and other relevant third parties, in the local language, and in a manner that is understood by all.

The Singtel Group expects suppliers will establish and maintain appropriate management systems, the scope of which are related to the content of this SCC. The Singtel Group also expects suppliers to be proactive, as they review, monitor and modify their management processes and business operations, to ensure alignment with the principles set forth in this SCC.

The Singtel Group will work with suppliers to ensure we achieve an improved performance in each of the areas outlined below. All procurement decision making will favourably consider suppliers that have adopted these areas, or can demonstrate they will work with us, to achieve the minimum standards set out in this document.

The SCC is designed to:

- improve the environmental and social performance of Singtel procurement activities;
- reduce the environmental and social risks associated with Singtel business activities;
- clearly detail the minimum standards we have for our supply chain;
- outline the measures the Singtel Group is taking to prevent the occurrence of Modern Slavery, breaches to labour laws and other human rights breaches, in Singtel's operations and supply chain;
- ensure Singtel procurement activities are inclusive, allowing opportunity for business development with small to medium enterprises associated with regionally recognised social minority groups; and
- work with our suppliers to enhance their sustainability performance.

Singtel expects its suppliers to encourage and work with their own suppliers and subcontractors to ensure they also strive to meet the principles of this SCC or equivalent set of principles.

## 2. Corporate Governance - critical areas

The Singtel Group embraces the core areas outlined in the UN Global Compact of human rights, labour standards, the environment and anti-corruption. We have incorporated in the guideline critical areas of Supplier operations that are central to our environmental and social performance.

For each of these areas we have a set of minimum requirements for our suppliers. Compliance with these minimum standards, where they are relevant to the type of goods and/or services provided, is essential if the Singtel Group is to successfully minimise its social and environmental impact and achieve our stated objectives. The critical areas detailed in this SCC are:

- Human Rights
- Anti-Modern Slavery
- Workplace Health and Safety
- Environmental Management
- Materiality
- Supplier Management

The Singtel Group expects that a Supplier's environmental and social risks and opportunities are integrated into its organisation's governance policies and risk management frameworks.

## 3. Human Rights and Modern Slavery

### 3.1 GENERAL

The Singtel Group expects its suppliers to comply with all local and national laws and international standards in connection with environmental practices, labour and human rights, including Modern Slavery.

The Singtel Group prohibits the use of all forms of slavery, servitude, forced labour, trafficking in persons (including orphanage trafficking of children), forced marriage, child labour, debt bondage, and other slavery like practices (**Modern Slavery**) in our business operations and supply chains. The Singtel Group is committed to operating in a manner consistent with national and international anti-Modern Slavery laws.

The Singtel Group recognises that its suppliers should uphold equal opportunities, freedom of association and the effective right to collective bargaining for its employees.

Where work is done internationally, suppliers must have systems to demonstrate compliance with:

- the International Labour Organization (ILO) Conventions on Labour Standards (<http://www.ilo.org/declaration/lang--en/index.htm>),
- the United Nations (UN) Universal Declaration of Human Rights (<http://www.un.org/en/documents/udhr/index.shtml>), and
- the UN Convention on the Rights of the Child (<http://www.unicef.org/crc/>).

### **3.2 LABOUR RIGHTS**

The Singtel Group expects its suppliers to prohibit any use of forced, bonded, indentured or involuntary labour, and embrace employment practices consistent with ILO conventions pertaining to forced labour and Modern Slavery laws. All work, including overtime work, must be voluntary and workers should be free to leave upon reasonable notice. Suppliers must provide their employees adequate housing/living conditions according to applicable laws, and Supplier should also not mandate that workers hand over government-issued identification, passports or work permits as a condition of employment.

### **3.3 CHILD LABOUR**

Child labour is strictly prohibited. Suppliers shall not employ children. The minimum age for employment or work shall be the minimum age for employment in that country, or the age for completing compulsory education in that country, whichever is higher. The Singtel Group expects its suppliers not to engage in any practice inconsistent with the rights set forth in the Modern Slavery laws, Convention on the Rights of the Child, the ILO Minimum Age Convention (C.1381973) or the Prohibition and Immediate Elimination of the Worst Forms of Child Labour Convention (C. 1821999).

### **3.4 ANTI-HARASSMENT & ABUSE**

The Singtel Group expects its suppliers to support and respect the protection of internationally proclaimed human rights and to ensure that they are not complicit in human rights abuses. The Singtel Group expects its suppliers to create and maintain an environment that treats all employees with dignity and respect, and will not use any threats of violence, sexual exploitation or abuse, verbal or psychological harassment or abuse. No harsh or inhumane treatment, coercion or corporal punishment of any kind is tolerated, nor is there to be the threat of any such treatment.

### **3.5 ANTI-CORRUPTION**

Suppliers must have an internal system to remunerate employees fairly and responsibly, and a complaints management process for employees, suppliers and customers. The Singtel Group expects its suppliers to adhere to the highest standard of moral and ethical conduct, to respect local laws and not engage in any form of corrupt practices, including extortion, fraud or bribery.

### **3.6 ANTI-DISCRIMINATION**

It is expected that supplier do not discriminate in respect to employment in relation to race, colour, sex, religion, political opinion, age, sexual orientation or disability. Employment should negate these discrimination characteristics and be awarded on merit or the inherent requirements of the job.

### **3.7 DUE DILIGENCE AND RISK MANAGEMENT**

The Singtel Group has measures throughout its procurement procedures, including in supplier contracts and invitations to tender, to ensure respect for human rights. Suppliers will not be contracted if they are alleged to have committed, or have committed, offences in relation to Modern Slavery and human trafficking, or if they are alleged to have breached or have breached, any anti-Modern Slavery and anti-human trafficking laws.

To the extent that a supplier has any concerns with the requirements of this SCC, or believes that they could potentially be in breach of any aspect, it is the supplier's obligation and responsibility to proactively inform the Singtel Group of these risks or issues.

The Singtel Group is taking steps to conduct due diligence of our business and of some of our suppliers, to assess human rights and Modern Slavery risks. This includes auditing new and existing suppliers to ensure that they comply with our anti-Modern Slavery requirements. These audits are focused on the areas of highest risk to human rights and Modern Slavery.

As part of risk management, employees, temporary employees, contractors and consultants engaged by any entity in the Singtel Group must identify any Modern Slavery risks that may arise through the Singtel Group's business activities (including in the supplier engagement process) and to mitigate, or wherever possible eliminate, such risks.

## 4. Workplace Health and Safety

### 4.1 WORKFORCE POLICIES AND LABOUR PRACTICES

The Singtel Group's approach to Health, Safety and Security proactively supports the physical, emotional and financial wellbeing of our staff. Our commitment to creating a safe and healthy work environment for all staff is described in our occupational health and safety policy. We have a comprehensive Health and Safety Management system that includes annual Health, Safety and Environment Operational plans.

### 4.2 WELLBEING

The Singtel Group has principles, policies and practices that create a positive environment for our staff, customers and the communities in which we operate. We value open communication and seek to establish relationships that are based on integrity and trust.

## 5. Environmental Management

### 5.1 GENERAL

The Singtel Group asks our suppliers to work with us to ensure the Group utilises best practice approaches in environmental management, which consider cost effective solutions, take into account use of raw materials, and reduce waste. The Singtel Group also encourages suppliers to give consideration to, and adopt, effective environmental management practices.

### 5.2 PRECAUTIONARY PRINCIPLE

The Singtel Group expects its suppliers to comply with existing legislation and regulations regarding the protection of the environment in the countries where they operate. Suppliers should adopt a precautionary approach to environmental matters, undertake initiatives to promote greater environmental responsibility and encourage the diffusion of environmentally friendly technologies implementing sound life-cycle practices.

### 5.3 CARBON EMISSIONS

All efforts should be made by suppliers to reduce greenhouse gas outputs through performance and efficiency measures. Upon request (and where practicable) suppliers must provide reporting data on third party transportation and distribution of products, including between a company's tier 1 suppliers and its own operations, and between the point-of-sale and the end-consumer (including retail and storage).

## **5.4 WASTE AND PACKAGING**

Suppliers must comply with local, national and international laws (i.e. Basel, Stockholm and Rotterdam Conventions) in relation to hazardous wastes, persistent organic pollutants and hazardous chemicals. In the production, maintenance and disposal of goods, and within the standard business practices of the Singtel Group and its suppliers, the Singtel Group seeks to reduce and minimise waste of all types, and encourage and promote the recycling and re-use of materials. The Singtel Group expects its suppliers to use the minimum packaging that is consistent with safe, hygienic and protective transport of goods. Having met those requirements, it is expected the Supplier will identify and use packaging that will be recyclable and efficient.

## **5.5 PRODUCT STEWARDSHIP**

The Singtel Group expects its suppliers to consider the end-of-life treatment of products and provide information on: supplier take-back scheme(s), feasibility and cost of removal/destruction of product; raw materials; smart design; fuel and water consumption; and emissions and energy in products.

Throughout the end-to-end manufacturing, transportation, operation and maintenance of their product, suppliers are asked to undertake the manufacturing of goods with due consideration to environmental responsibility in the:

- raw material extraction and use;
- smart design of the product(s);
- consumption of fuel and water;
- amount of carbon emissions created; and
- energy required to extract, create, transport, operate and dispose of products.

# **6. Materiality**

## **6.1 CONFLICT MINERALS**

The Singtel Group will work to try and ensure that it takes all steps within its powers to ensure that metals from conflict areas do not enter its supply chain. Conflict minerals in the eastern DRC are generally defined as cassiterite (tin), coltan (tantalum), wolframite (tungsten) and gold, or derivatives of these minerals (per the OECD due diligence guidance for responsible mineral supply chains).

## **6.2 DATA PRIVACY**

The Singtel Group takes the privacy and data security of our customers and staff very seriously and we expect our suppliers to protect data and respect our privacy requirements and obligations. Throughout our whole value chain, the expectation is that data privacy is of the highest priority and that any breaches will be reported immediately and transparently.

## 7. Supplier Management

### 7.1 PERFORMANCE REPORTING

Reporting on its environmental and social performance to key internal and external stakeholders in a transparent and honest manner, in keeping with best practice reporting standards and applicable regulatory requirements, is an expectation the Singtel Group has for all its supply chain. Suppliers' standard business operations are encouraged to incorporate management of, and reporting on, the progress of their internal sustainability plans, diversity initiatives and workplace practices and policies. These reports should be provided to the Singtel Group if available, and upon request.

### 7.2 INFORMATION SHARING

The Singtel Group's expectation of its suppliers in the context of sustainability is that they use their influence to engage with their own suppliers to achieve the objectives outlined in this SCC.

The Singtel Group has a framework in place to assess the social and environmental performance of our suppliers. We ask suppliers to provide us with information about how they manage the social and environmental issues associated with their business as a standard part of our tender process and conduct regular contract reviews. This includes how suppliers identify and manage risks to their business, whether they have systems to minimise their environmental impact, details of their employment, health and safety practices and whether they engage with their internal management, customers and community.

The Singtel group expects that suppliers will embed similar principles to manage their own supplier's environmental and social performance, and to ensure they meet the minimum requirements as detailed in this document. To the extent that a supplier has any concerns with the requirements of this code, or believes that they could potentially be in breach of any aspect, it is the supplier's obligation and responsibility to proactively inform the Singtel Group of these risks or issues.

### 7.3 MONITORING AND EVALUATION

In line with our own commitments, suppliers to the Singtel Group are required to engage and manage their own suppliers regarding their social and environmental impacts and performance. When requested, suppliers must provide honest and transparent responses to the Singtel Group Supplier Self-Assessment. The Singtel Group may, from time to time, conduct onsite evaluations and inspections of its supplier's facilities, and those of their subcontractors supporting Singtel Group's operations, to review progress by the supplier against this SCC.

The Singtel Group undertakes to conduct on-site evaluations no more than once in any two years period.

## 7.4 WHISTLEBLOWER HOTLINE

If suppliers wish to raise concerns, or report any incident of actual or suspected unethical conduct, by Singtel, Optus, a supplier, or any third party with whom they do business relevant to their supply relationship with Singtel and/or Optus, then it can be reported to the normal contact in Singtel or Optus. Alternatively, if the person making the report does not feel comfortable with that option then reports can also be made to the independent whistleblower hotline that is appropriate to their location and supply relationship. The whistleblower hotline provides a safe way to report any wrongdoing, including fraudulent, corrupt, illegal or inappropriate conduct:

Mechanism	Singtel Group ( <u>except</u> entities in Australia)	Australia
External Whistleblower Hotline (Phone / email / internet)	Independently operated by an external service provider (Deloitte) at:  Tel: +8000 9447853  or via the internet at <a href="http://deloittewhistleblowerhotline.tipoffs.asia">http://deloittewhistleblowerhotline.tipoffs.asia</a>	Independently operated by an external service provider (PKF) at:  Tel: 1800 500892  or by email to <a href="mailto:optushotline@pkf.com.au">optushotline@pkf.com.au</a>  or via the internet at <a href="http://www.talkintegrity.com/optus/">www.talkintegrity.com/optus/</a>  <u>OR</u>  <a href="http://whistleblower.optus.com.au">whistleblower.optus.com.au</a>

## 7.5 FURTHER INFORMATION

To assist the Singtel Group with its compliance obligations, including reporting on management of suppliers and compliance with this SCC, please contact Singtel Procurement ([g-grpproc@singtel.com](mailto:g-grpproc@singtel.com)) for policy direction, and update information on any internal initiatives the supplier has implemented, or will implement.