



## SUPPLIER CODE OF CONDUCT

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## Introduction

The Qantas Group is committed to ensuring that its procurement practices are transparent, fair and responsible, and uphold high standards of integrity and honesty.

With a multi-billion dollar annual procurement spend and thousands of suppliers, we are a major purchaser of a wide range of goods and services, and recognise that our responsibility extends to the focused and professional management of our supply chain.

This document establishes our expectations of suppliers, and their supply chain, in providing goods and services to the Qantas Group.

## Qantas Non-Negotiable Business Principles

The Qantas Group's corporate governance framework, comprising of our Non-Negotiable Business Principles and Group Policies, guides how we do business. The Principles are:

1. We are committed to safety as our first priority
2. We comply with laws and regulations
3. We treat people with respect
4. We act with honesty and integrity, upholding ethical standards
5. We are committed to true and fair financial reporting
6. We are committed to environmental sustainability
7. We have a responsibility to safeguard the Qantas Group's reputation, brands, property, assets and information
8. We proactively manage risk

The Qantas Group Non-Negotiable Business Principles inform our expectations of suppliers, and form the basis for this Supplier Code of Conduct.

## Safety

The Qantas Group Safety and Health Statement commits the organisation to creating a healthy and safe workplace by preventing injuries, illness, accidents and incidents through effective safety management systems and risk controls, quality processes and a safety culture. The Statement is available to external parties, including regulatory authorities, suppliers, contractors, contingent workers and workplace visitors.

The [Qantas Group Safety and Health Policy and Statement](#) can be found here.

The standards the Qantas Group maintains as a corporation are key to our business success. Every supplier needs to be aware of these standards and the conduct required of their contractors.

The Qantas Group and its suppliers and their contractors are bound by relevant state and federal legislation in relation to standards and conduct.

### **We expect that suppliers to the Qantas Group will:**

- Adhere with our Qantas Group Management System (GMS) Standards and meet our Work, Health and Safety (WHS) legislation requirements
- Report, monitor and manage WHS risks and incidents, aligned to applicable state laws and standards
- Comply with all Qantas site-specific safety requirements.

## Corporate Governance and Ethics

Good corporate governance is core to ensuring the creation, protection and enhancement of shareholder value. The Qantas Board maintains, and requires that Qantas Management maintain, the highest level of corporate ethics. The [Qantas Group Code of Conduct and Ethics](#) sets out the expectations and requirements with respect to a number of areas, including compliance with laws, regulations and ethical standards, managing conflicts of interest, maintaining accounting records, treating people with respect, ensuring equal employment opportunity and the [Qantas Group Whistleblower Policy](#). We are committed to working with partners and suppliers who share our commitment to ethical and sustainable business practices, and operate in a way that aligns with our values and expected behaviours.

### We expect that suppliers to the Qantas Group will:

- Comply with all applicable laws and regulations in all locations where the supplier conducts its business
- In addition to complying with applicable laws and regulations, act in accordance with high standards of business ethics and this Code of Conduct
- Communicate the Qantas Group Whistleblower Policy to their workers, and maintain their own Whistleblower policy and accessible reporting processes and mechanisms for workers to report misconduct, violations, grievances or other concerns or information without fear of detriment
- Communicate the expectations outlined in this Code of Conduct in a manner that can be understood, to people providing products and services to the Group, including subcontractors.

## ANTI-CORRUPTION

### We expect that suppliers to the Qantas Group will:

- Adopt a zero tolerance approach towards bribery and corruption
- Ensure that its directors, employees and third parties acting on its behalf do not offer, pay, accept or take bribes or be involved in any form of corruption, including facilitation payments
- Not engage in any form of kickback scheme or otherwise offer any incentive to Group employees or their family or friends in order to obtain or retain any business
- Not provide any hospitality, gifts or expenses to a Group employee in a situation in which it might influence, or appear to influence, the employee's decision making in relation to the supplier
- Maintain accurate and auditable financial and business records, in accordance with all applicable legal and regulatory requirements
- Avoid situations where there is a conflict of interest between the supplier and the Group and ensure that the personal interests, commercial activities or affiliations of workers and subcontractors, do not conflict or improperly influence their responsibilities to the Group
- Disclose all actual or potential conflicts of interest in relation to its relationship with the Group.

## SANCTIONS

### We expect that suppliers to the Qantas Group will:

- Comply with all relevant national and international laws, regulations and restrictions
- Observe all relevant trade bans, restrictions, sanctions and boycotts that apply to areas in which you and your supply chain operates.

## LABOUR AND HUMAN RIGHTS

The Qantas Group is committed to the respect of Human Rights as set out in the UN Universal Declaration of Human Rights. We expect all our suppliers to adhere to the same human rights standards as we do, and to treat others with trust, dignity, respect, fairness and equity. Our objective is to ensure the working conditions of workers in our supply chain meet applicable legislation and relevant labour standards, including those set out in the Universal Declaration of Human Rights, the UN Convention on the Rights of the Child and the International Labour Organisation Declaration on Fundamental Principles and Rights at Work.

**We expect that suppliers to the Qantas Group will respect internationally recognized human rights by:**

- Conducting their activities in a manner that implements the core international business and human rights standards, including the UN Guiding Principles on Business and Human Rights
- Complying with all relevant local and national laws and regulations
- Ensuring that no forced labour, involuntary labour or other forms of modern slavery is used
- Prohibiting the use of child labour and taking measures to verify that all workers are of legal age and ensuring that no person under the age of 18 undertakes hazardous work that would likely jeopardise the physical or mental health, safety or development of the person
- Making sure that compensation paid to employees complies with applicable labour laws, including minimum wage laws, overtime wages and mandatory benefits
- Providing a safe and healthy working environment and fair work conditions for all workers including adequate rest periods, sufficient leave, freedom of association and collective bargaining
- Prohibiting the withholding of workers identity and immigration documents and the charging of recruitment fees to secure employment
- Implementing processes to identify risks to people in its operation and supply chain and where potential harm is identified, taking steps to prevent and remediate any harm
- Treating their employees with respect and dignity, preventing bullying, harassment and unfair discrimination and promoting a safe workplace free from physical, sexual, psychological or verbal harassment or abuse
- Ensuring there are channels for people to raise concerns and access remedy, and that where potential harm is identified it is investigated and addressed.

## Environmental Management

The Qantas Group is committed to:

- Doing business in an environmentally responsible manner, protecting the environment and reducing our environmental impact
- Complying with environmental law, regulatory requirements and environmental licence conditions
- Identifying and implementing strategies to effectively manage and reduce our environmental risks.

Our strategy and approach to climate change, including targets, are set out in our Climate Action Plan. We report against progress in our annual Sustainability Report.

**We expect that suppliers to the Qantas Group will:**

- Comply with environmental law, regulatory requirements and environmental license conditions applicable to their business
- Publicly report on their environmental performance (where applicable)
- Have an Environment Policy detailing key environmental risks and mitigations (where applicable).

## Business Resilience

The Qantas Group takes a holistic and coordinated approach to risk, emergency and crisis management, business continuity and recovery. This approach ensures the safety and welfare of people, protection of the Group's assets and brand and maintenance of critical services in the event of a major incident, emergency or crisis affecting the Group.

**We expect that suppliers to the Qantas Group will:**

- Have adequate emergency response plans to ensure the safety and security of their employees and operations in the event of unforeseen events such as a major catastrophe, natural events and pandemic disease, and to minimise business disruption arising from such events
- Maintain a business continuity plan that includes clear escalation processes to communicate with the Qantas Group in the event that the organisation's normal operations are disrupted in a manner that could impact supply to the Qantas Group, assurance on business continuity arrangements that contains robust controls and measures to minimise the impact from loss of critical people, facilities, systems and equipment in line with their risk profile
- Provide emergency response and business continuity plans to Qantas at their request and participate in any training, exercising or awareness sessions following an invitation to take part that would impact their ability to continue their operations
- So far as reasonably practicable, follow any Australian standards or regulations in relation to business continuity, crisis and emergency management.

## Data Security and Privacy

The Qantas Group is constantly improving our cyber and privacy capabilities as part of our overall data protection approach. Like many large organisations, we operate in an environment of ever-evolving cyber threats, where attackers continually adopt more sophisticated techniques. We recognise that protecting systems, applications and the data that they hold from these attacks — and avoiding the potential customer, financial and reputational implications associated with unauthorised access to the information we hold — is key.

We acknowledge our responsibility to protect and maintain the privacy rights of individuals, and to maintain the security and the value of their personal information. The Group is committed to raising awareness of our privacy compliance obligations and to managing our privacy risk by implementing a culture that considers 'privacy by design' as a default position when handling personal information.

### **We expect that suppliers to the Qantas Group will:**

- Collect, share, use, store and process data (including personal information) in accordance with our instructions and applicable international and domestic laws and regulations
- Work with us to complete risk assessments and to address material cyber and privacy risks identified
- Make the appropriate investments in resources, processes and technology required to secure systems/applications and to manage data securely and effectively on behalf of the Qantas Group
- Meet the Qantas Group's expectations regarding fair, ethical and responsible data processing and use.

## Community Investment

As Australia's national carrier, the Qantas Group plays a key role supporting Australian communities and having a voice on social issues. We have a responsibility to work with and contribute to the community.

We partner with organisations that positively support the community and make a genuine contribution in the pillars of:

- Inclusion and diversity including our Reconciliation Action Plan
- Regional Australia
- Environmental and social sustainability
- Showcasing the best of Australian culture
- Building national pride through sport.

Qantas does not establish specific supplier expectations in relation to community activities. However, community engagement or community investment programs undertaken by suppliers, working to solve social or environmental issues, will be taken into consideration.

## Supplier Diversity

The Qantas Group is committed to building and fostering a culture in which diversity is valued. Qantas supports supplier diversity through engagement with minority owned businesses, including Indigenous and women-owned businesses, disability enterprises and community partners. This continues the Qantas tradition of engagement with our community and support for employment, growth and financial and social inclusion.

A key part of our vision for reconciliation is the economic inclusion of Aboriginal and Torres Strait Islander peoples. We recognise the mutual benefit of doing business with Aboriginal and Torres Strait Islander suppliers. For the Qantas Group, these suppliers bring uniquely Australian experiences and products to our customers. For Aboriginal and Torres Strait Islander suppliers, owning a business can generate wealth, foster a connection to culture and create opportunity in local communities. We encourage all suppliers to the Qantas Group to assist in our vision for reconciliation. At different intervals within the procurement lifecycle, we will request information on how our suppliers support and promote Aboriginal and Torres Strait Islander people, communities and enterprises.

The Qantas Group does not establish other specific supplier expectations regarding supplier diversity. However, suppliers' diversity policies, programmes and initiatives will be taken into consideration.

## Animal Welfare

The Qantas Group supports the ethical and humane treatment of animals, aligned with the RSPCA's Animal Policies. The Qantas Group ensures that animal transportation on our network meets and exceeds the standards of the IATA Live Animal Regulations, as recommended by the RSPCA.

**We expect that suppliers to the Qantas Group will:**

- Conduct their activities in a manner that aligns to the RSPCA's Animal Policies
- Ensure that any animals involved in the goods/ services provided to Qantas are treated humanely
- Avoid the use of animals in experiments that cause suffering or distress and are not essential to humans or animals
- Avoid cruel or inhumane use of animals in any industrial activity
- Avoid supporting cruel or inhumane use of animals in any sporting or entertainment event.

## Supply Chain Risk Management

Our Supply Chain Assurance (SCA) program standardises the way we identify, assess and manage risks in our supply chain. Our SCA program allows us to make determinations as to suppliers' standards, practices and management across a range of risks. On this basis, suppliers are evaluated on their suitability to provide products or services to the Qantas Group. The program applies a combination of questionnaires, due diligence and third-party data.

**We expect that suppliers to the Qantas Group will:**

- Ensure that this Code of Conduct is communicated to all their workers, in the local language and in a manner that can be understood
- Hold their workers to the supplier expectations contained in this Code of Conduct
- Work with their own suppliers to ensure their supply chain meets the principles of this Code of Conduct
- Respond to all information requests, including risk assessments and due diligence questionnaires, in a timely manner
- Provide open, honest and complete information
- Provide all requested supporting documentation
- Support Qantas in carrying out on-site reviews, where required
- Complete agreed remediation action plans, where required.

