

Supplier Code of Conduct



Helia Supplier Code of Conduct:

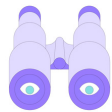
- Is the framework that fosters and maintains Helia's relationship with suppliers*
- Outlines the standards and practices expected by the community of Helia and its suppliers
- Is the ongoing commitment that Helia and its suppliers are held to account
- Forms part of our corporate social responsibility approach
- Suppliers must ensure the obligations in this Code are flowed down to all subcontractors and third parties engaged in delivering goods or services to Helia.

About Helia

As a leading market provider of risk and capital management solutions in residential mortgage markets, Helia is committed to implementing the highest professional and ethical standards in our business practice. To uphold and support these standards our people are accountable for demonstrating our values in everything they do:



Own it



Rethink the everyday



Grow together

Helia’s values underline our company culture and help form the standard of behaviour we expect from our people.

Commitments

Helia recognises the key role of Helia and suppliers in positively contributing to the social, economic and environmental wellbeing of the communities that we are part of.

As such, Helia believes mutual commitments between Helia and suppliers, to operate in accordance with community expectations of businesses, create a more sustainable value for all stakeholders. Helia will work collaboratively with suppliers to foster a relationship that aligns with the standards in this code and the interests of stakeholders.

Helia is committed to:

- Ethical and sustainable business practices
- Upholding human rights
- The highest workplace standards.

Helia expects all suppliers to share in Helia’s commitments and adhere to these standards when they conduct their business. Suppliers must continually review and comply with the Code and communicate this with their employees and supply chain**. Suppliers must notify Helia of any breaches or material shortcomings in relation to the code and must reasonably seek to address, remediate and prevent the recurrence of these issues.

Principles

1. Ethical and sustainable business practices

Proper business practices, with community standards and expectations in mind, are the foundation to building and preserving relationships among different stakeholders that allow Helia to create sustainable value for all of Helia’s stakeholders.

Accordingly, Helia expects all suppliers to comply with guidance set out in the following key focus areas:

a. Governance and culture

Helia strives to maintain a strong corporate governance and culture to ensure the business is conducted in a lawful, ethical and socially responsible manner, which includes its suppliers.

Helia expects all suppliers to comply with applicable laws, regulations and industry standards and to reinforce a culture of lawful and ethical behaviour across all parts of their business. Beyond that, suppliers should continually reinforce these business practices having a culture of acting lawfully and ethically, and regard to their relationships with all of their stakeholders. As such, suppliers must have a written policy that outlines proper and appropriate conduct and standards for employees.

b. Data Protection and Cyber Security

Suppliers must implement reasonable technical and organisational measures to protect Helia data and personal information from unauthorised access, disclosure, loss or misuse. Suppliers must comply with privacy laws (including the Privacy Act 1988 (Cth)) and notify Helia without undue delay of any data breach affecting Helia information.

c. Anti-bribery and corruption

Helia’s non-tolerance and attitude against improper payments or benefits to or in relation to its employees is detailed in its comprehensive Anti-bribery and Corruption Policy.

Helia’s Anti-bribery and Corruption Policy can be found under the Corporate Governance Section at: [key policies](#)

We expect suppliers, at a minimum, comply with anti-bribery and corruption laws and have adequate internal processes to address actual or suspected cases of bribery and corruption in their business. These processes will include but are not limited to rejecting any improper business practices; not misusing authority or position for financial gain; declaring any personal interests or other conflicts of interests that may affect impartiality in dealings like the receipt of gifts or other benefits; and not breaching any confidentiality of information received.

Additionally, suppliers must not engage with persons, countries or organisations sanctioned by the United Nations Security Council, Australian Government or associate themselves with criminal activities.

*Supplier means any entity providing goods or services to Helia (including subsidiaries, affiliates and subcontractors).

**Supply chain includes upstream contractors and third-party service providers.

d. Whistleblower Policy

Helia maintains a strong Whistleblower Policy and procedure that promotes proper and ethical professional conduct in the workplace.

Under the Whistleblower Policy, anyone who is, or has been, a supplier or contractor (or their employees or subcontractors) and others may raise a concern in relation to this code with:

- their supplier relationship manager at Helia
- the Helia Ombudsman: by email to Ombudsperson@helia.com.au, by telephone on 1800 213 140 or by post to Helia, 101 Miller Street, Level 26, North Sydney NSW 2060. All reports sent by post should be clearly marked to the attention of the Ombudsperson.
- Your Call, an independent Whistleblower service provider: by telephone on 1300 790 228 or on their website at whistleblowing.com.au/ report with Helia’s ID “Helia101”.

‘Your Call’ is a service that can capture anonymised complaints and is available for use by all rights-holders (inclusive of but not limited to all employees, directors, managers, contractors, consultants, volunteers, visitors, customers, and the wider community).

More information on Helia’s Whistleblower Policy and the avenues to raise concerns can be found under the Corporate Governance section at: [key policies](#)

Helia expects its suppliers and contractors to uphold its values and workplace standards; they are strongly encouraged to report on any breaches or suspected breaches of this code by Helia employees or its suppliers and contractors or concerns about their relationship with Helia.

Suppliers should also have a Whistleblower Policy or process, or a similar system that enables employees to raise their concerns.

e. Environmental management

Helia recognises the importance of minimising the environmental impact of operations and business for both present and future generations. Helia believes that this not only reduces environmental footprint and operational costs but also demonstrates Helia’s commitment and approach towards corporate responsibility.

Suppliers must at least comply with all relevant environmental laws, regulations and mandated local authority requirements in their jurisdiction. Helia expects that suppliers will use energy, water and other resources efficiently as to reduce waste and actively promote the reduction of greenhouse gas emissions through their business practices. Suppliers should undertake best practice by continually raising awareness of environmental issues among their employees and other stakeholders in their business.

Helia may from time to time require suppliers to review and present alternative environmental management strategies if it reasonably benefits the relationship and helps to reduce our collective environmental footprint.

2. Human rights

Helia is committed to upholding the human rights of all workers and acknowledges the fundamental entitlement of all human beings to liberty and dignity. Helia endeavours, and expects suppliers, to respect the standards in the UN Universal Declaration of Human Rights, UN Guiding Principles on Business and Human Rights, International Labour Organisation on Fundamental Principles and Rights at Work in all business operations and supply chains.

a. Eliminating forced and compulsory labour; and child labour

Helia expects all suppliers to uphold core human and labour rights and to ensure these protections extend throughout their supply chains.

Labour rights	Modern Slavery indicators
• Employment is freely chosen • Freedom of association and the right to collective bargaining is respected • Working conditions are safe and hygienic • No child labour • Living wages are paid • Working hours are not excessive • No discrimination is practised • Regular employment is provided • No harsh or inhumane treatment	• No retention of identity documents • There is no forced, bonded, or involuntary prison labour • Workers are not required to lodge "deposits" or fees to ensure employment • Workers are free to leave their employer after reasonable notice

Helia will not tolerate any form and presence of human trafficking, slavery and slavery-like practices and child labour within its operations or that of its suppliers.

At a minimum, suppliers and contractors must comply with all laws in their relevant jurisdiction in relation to human trafficking, slavery and child labour in the workplace. Suppliers must also not engage in or facilitate any inhumane treatment of workers, including sexual abuse, corporal punishment, mental or physical coercion. Helia further expects that all suppliers will reach beyond this and actively ensure that these modern slavery^ practices do not occur within their business.

b. Freedom of association and collective bargaining

Helia expects that suppliers will respect the rights of workers to freely associate, collectively bargain and join or not join trade unions and other legitimate associations. We encourage suppliers to cultivate open communications and direct engagement between workers and management to facilitate an effective resolution of workplace issues.

c. Family and domestic violence

Helia expects that suppliers will adhere to the Helia Family Violence Awareness Policy when interacting with consumers on behalf of Helia. We also encourage suppliers to implement arrangements to support their employees which may be affected by family and domestic violence and to document these arrangements in a policy that suppliers make available to their employees as well as publicly available on their website.

^Modern slavery has the meaning in the Modern Slavery Act 2018 (Cth).

3. Workplace standards

Helia makes the health, safety and wellbeing of all its employees a priority, which extends to diversity and inclusiveness in the workplace. Helia believes the continual focus on employees by providing them with a fair, respectful and safe workplace is fundamental to the ongoing success of Helia. In upholding these high workplace standards, many business practices including recruitment and work arrangement promote equal opportunities and reflect the diverse backgrounds, experiences and perspectives of Helia employees.

a. Work health and safety

Suppliers must comply with all their legal responsibilities in Work Health and Safety (WHS) legislations or similar laws.

Helia expects suppliers to ensure that all reasonably practicable steps are taken so all work activities are carried out safely with consideration of the health of workers, contractors and the general community. This means the supplier has appropriate systems and processes in places, so that injuries or harm should not occur in the workplace if reasonable measures are taken. Helia requires suppliers to publicly disclose injury frequency rates where possible. Beyond this, we expect that employees, contractors or the members of the community will be able to freely communicate with the supplier on WHS issues including safety risks, near-miss or incidents.

b. Recruitment and working arrangements

Suppliers must comply with all relevant wage and anti-discrimination laws in their jurisdiction, which includes adhering to minimum wage levels, compensating for overtime hours and providing equal employment opportunities.

Helia expects all suppliers to remunerate their employees and contractors adequately and fairly for their time, effort and skills. Remuneration should not have regard to age, gender, cultural background, family status, ethnicity, nationality, religion, sexual orientation and disability. Accordingly, suppliers should have fair and consistent recruitment and selection processes whereby all suitably qualified candidates, despite their background, will have an equal opportunity for employment.

Suppliers must also ensure all their employees and contractors have fair and reasonable working hours, levels of remuneration and leave arrangements by considering their personal circumstances, the needs of the workplace, any risks to their health and safety and legal requirements in the relevant jurisdiction. Under no circumstances should prospective employees be asked to pay a deposit.

c. Diversity and inclusion

At Helia, diversity and inclusion are part of business as we believe diverse teams working in an inclusive environment are more effective and this drives value for shareholders, customers and our people. We encourage suppliers to mirror this commitment to diversity and inclusion in their own supply chains.

Whilst complying with all relevant laws, we are also committed to promoting a workplace that recognises and embraces the skills, characteristics and experiences that people bring to Helia through, among other things, age, caring responsibilities, cultural diversity, nationality, gender, indigeneity, sexual orientation and religion. This is supported by Helia’s Human Resources policies, which include Diversity, Equity and Inclusion, Domestic and Family Violence, Flexible Work Arrangements, Recruitment and Workplace Health & Safety and Workplace Standards policies.

Helia’s Diversity, Equity and Inclusion Policy can be found under the Corporate Governance Section at: [key policies](#)

Helia expects that suppliers create a similar inclusive environment based on mutual respect, which fosters a sense of belonging and allows everyone to fulfil their full potential regardless of their background. Accordingly, suppliers should be committed to prevent workplace bullying, unlawful discrimination, and harassment so to provide an equal chance for everyone to succeed in their workplace.

Ongoing review

Helia may conduct regular assessments of the conduct and practices of suppliers and contractors with the standards of this code. These assessments may include self assessments by suppliers, requests for supporting documents, audits and other material and direct engagements with Helia. During these engagements with Helia, we expect that suppliers provide us with full and frank responses when reasonably requested.

Mutual responsibility

Helia desires to work in relationship with its suppliers and takes shared responsibility for conduct. Helia wishes to create good business practices through a collaborative and stakeholder approach.



Contact information

For any questions relating to Helia's Supplier Code of Conduct, please contact Helia’s Head of Property and Procurement at sourcingandfacilities.helia@helia.com.au