

January 2021



Zurich Australia Supplier Code of Conduct



1. Introduction and Purpose

Zurich Insurance Company Limited (“**Zurich Group**”), is a leading multi-line insurer that provides services to customers in both global and local markets. With a presence in more than 215 countries and territories, Zurich Group’s customers include individuals, small businesses, mid to large sized companies as well as multi-national corporations.

In Australia, Zurich Financial Services Australia Limited (“**Zurich**”; “**we**”; “**us**”), a company within the Zurich Group endeavours at all times, to provide its customers with the highest levels of service and professionalism – we recognise that use of suppliers and third parties is critical to this objective. Accordingly, Zurich imposes high expectations and standards of all its suppliers, and this Supplier Code of Conduct (“**Code**”) outlines Zurich’s minimum requirements and expectations of its suppliers and thirdparty providers in their delivery of products and services to Zurich.

2. Zurich’s External Commitments

When interacting with customers, employees, shareholders, suppliers, the public at large and any other stakeholders, We aim to promote the following international best practice standards to manage potential adverse human rights impact.

- [United Nations Global Compact](#) (Zurich Group became a signatory in July 2011)
- [Principles for Responsible Investment](#) (Zurich Group became a signatory in July 2012)
- [The United Nations Environment Programme Finance Initiative \(UNEP FI\) Principles for Sustainable Insurance](#) (PSI) (Zurich Group joined in 2017)
- [United Nations Sustainable Development Goals](#) (Zurich Group has publicly committed to addressing environmental, social and governance factors as part of its day to day business activity to support United Nations Sustainable Development Goals)
- [Zurich’s Global Data Commitment](#) (Zurich Group announced this commitment in September 2019)

For more information visit:

<https://www.zurich.com/en/sustainability/being-a-responsible-business/our-strategic-priorities/external-commitments>.

Zurich is committed to integrity and transparency in all dealings with its vendors and suppliers, with engagement and onboarding of suppliers being subject to a number of internal policies and frameworks. Only suppliers who share Zurich’s values and minimum standards around best practice in regards to health and safety, sourcing and risk and compliance, are engaged and selected.

3. Sustainable Sourcing

Globally, Zurich has a Sustainable Sourcing Framework and works with suppliers and communities to promote best practices. Sustainable Sourcing is the integration of social, ethical and environmental performance factors into the process of selecting suppliers and ongoing evolution through the lifecycle of the contract. The goal of Sustainable Sourcing Framework is to build strong, long-term relationships with suppliers. Improving performance in environmental, social and ethical issues is becoming a major part of the overall process.

4. Zurich’s Minimum Standards

4.1 Legal and regulatory compliance

Zurich expects its suppliers to comply with all applicable regional, national and global laws and regulations. This includes any relevant industry codes and standards that may be applicable to the supplier in any jurisdiction in which it operates.

4.2 Ethical behaviour and conduct

In addition to compliance with applicable regulatory requirements, Zurich also expects its suppliers to act with the highest standards of honesty and integrity in its interactions with us, its own staff, other suppliers and customers. For example, Zurich expects the supplier to have controls in place to detect and mitigate against staff organisational bribery and corruption, inappropriate conflicts of interest as well as unconscionable conduct in dealing with suppliers and customers.

Zurich also expects its suppliers to consider their staff's well-being, including health and safety standards, avoidance of discrimination (of any kind), and also ethical recruitment standards and working conditions.

4.3 Transparency and disclosure

Zurich endeavours to be transparent in all its interactions – it expects the same of its suppliers. We encourage open dialogue and sharing of information – including any relevant information about the supplier's supply chains. We will work closely with suppliers to resolve any concerns from a contractual or performance perspective, and will attempt to assist where possible, to achieve common objectives and outcomes.

4.4 Management and governance

Zurich strongly emphasises and promotes a robust risk management and governance culture, with internal policies and procedures holding staff and suppliers to high compliance and risk standards from both a local and global perspective.

Zurich recognises that an effective corporate governance culture is critical to the management and mitigation of supplier and outsourcing risks. We expect suppliers to have policies, procedures, and monitoring mechanisms in place to identify and manage any material environmental and social impacts.

4.5 Data protection and privacy

Australian law requires us to protect the privacy of customer's personal information – all personal and sensitive information must be treated and protected in accordance with relevant privacy laws and regulations.

Zurich has developed a number of local policies and frameworks to facilitate compliance with Australian privacy legislation. As a global organisation, Zurich must also comply with data privacy standards developed by Zurich Group Compliance.

Zurich customers expect that we will treat their information with care and we expect this same standard of care from our suppliers.

4.6 Modern Slavery and management of supply chains

Zurich opposes modern slavery and human trafficking in all its forms, and expects the highest standards from its suppliers, contractors and business partners.

As part of our initiative to identify and mitigate risks of slavery and human trafficking in business units and supply chains, Zurich has developed the Zurich Australia Modern Slavery and Human Trafficking Policy ("**Policy**"), which all staff must read and adhere to. All staff are required to meet the standards set out in the Policy, with training around the requirements being provided to key business stakeholders.

In addition, staff must comply with Zurich's Employee Code of Conduct. The Employee Code of Conduct mandates the highest standard of behaviour, with human rights and ethical behavior at the forefront of all activities which Zurich undertakes, including recruitment, treatment of staff and appointment and monitoring of third party suppliers.

We expect the same high standards of our contractors, suppliers and business partners, and require them to consider the impacts of their supply chains, implement policies and procedures to ensure the ongoing monitoring

and oversight of third party relationships and also develop processes to escalate or remediate where modern slavery risks are identified within supply chains.

Zurich also expects suppliers, contractors and business partners to have frameworks in place to enable its own staff to confidentially communicate concerns in an anonymous and safe manner; these frameworks must be effective in ensuring staff grievances are dealt with in a fair, lawful and professional manner.

5. Compliance with this Document

This Code outlines Zurich's expectations for suppliers to comply with industry best practices and to consider their own frameworks in managing these expectations. If suppliers fall short of industry best practices, they will be expected to work collaboratively with Zurich to rectify any issues.

This Code complements the terms outlined in our contractual arrangements with suppliers. To this end, Zurich expects its suppliers to review this Code and to socialise the contents with its relevant staff (and supply chains where reasonable). Where the supplier is unable or unwilling to comply with any aspect of this document, we expect the supplier to communicate this to Zurich via their relationship manager or by emailing sustainable.sourcing@zurich.com.au. Zurich will work with the supplier to understand their concerns and arrive at a solution that is suitable in the circumstances.

Queries in relation to this Code can be directed to sustainable.sourcing@zurich.com.au

Zurich Financial Services Australia Limited

www.zurich.com.au

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