



Australian Government

Commonwealth Superannuation Corporation

Supplier Code of Conduct



**Commonwealth
Superannuation
Corporation**

Promoting shared values in CSC's supplier partnerships

The Supplier Code of Conduct (Code) sets out the minimum standards of behaviour that the Commonwealth Superannuation Corporation (CSC) expects within its supplier operations and supply chains. It promotes CSC's own values as a basis for building strong partnerships with likeminded businesses.

CSC is committed to building a culture where diversity is valued, our workplaces are free from discrimination, harassment, and bullying. CSC cares about people, respects human rights and requires all employees to treat others with trust, dignity, respect, fairness and equity. Suppliers must show the same respect throughout the supply chain. CSC only wishes to work with suppliers who share these commitments and values.

Our values, your values

CSC core values are outlined below. We extend these value expectations to all our business dealings.



Highest Standards of Ethics and Integrity

Our customers expect the highest standards of ethics and integrity in everything we do. The Code supports this purpose.

CSC corporate suppliers must commit to:

- Professional integrity and ethics via sound corporate policies and practices
- Full transparency of any conflicts of interest with CSC operations including providing details of how these are managed
- Ensuring appropriate due diligence is undertaken to seek out and eradicate any modern slavery exposures from their operations and supply chains
- Complying with all relevant laws aimed at combatting bribery and corruption, money laundering, terrorism financing and modern slavery
- Safeguarding CSC information and data assets
- Promoting healthy and safe workplaces
- Lawful and fair dealings with their employees, suppliers and competitors
- Social and environmental responsibilities.

CSC's expectations are detailed in this Code and apply to all corporate suppliers of [CSC and its associated entities](#).

Application of this Code

The principles outlined in this Code apply to all suppliers, employees of suppliers and contractors engaged to provide any goods and services required throughout the supply chain, irrespective of the geographical location of their operations (together "suppliers"). This code does not apply to supplier contracts related to investment management, investment advisory services, or other costs related to investment decision-making. For investment management service providers and custodian services, separate governance assessments are conducted as applicable.

Suppliers must communicate this Code to all related entities, suppliers and subcontractors who form part of their supply chain in providing goods or services to CSC, so that they are aware of, understand and comply with this Code.

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Ensuring Business Integrity and Ethics

Compliance with Laws and Regulations

Suppliers to CSC must comply with Australian (State and Federal) and international laws and regulations, policies, procedures and good business practices in all locations where they operate, and meet required standards of operation in relation to work health and safety, and anti-trust laws, environmental management and reporting, anti-bribery, anti-corruption, anti-money laundering, labour and child labour, as well as freedom of association and movement. Suppliers must not engage in human rights violations in their operations and supply chains, as outlined in the [United Nations Guiding Principles on Business and Human Rights](#).

CSC is regulated by the National Anti-Corruption Commission which is focused on maintaining the integrity of the Commonwealth public sector. As such, our suppliers can also be investigated by the commission and must therefore uphold the highest standard of ethical conduct.

Note: this Code does not supersede or alter the suppliers' legislative, policy, regulatory, or other contractual obligations.

Professional Integrity and Conduct

Suppliers must not engage in, either directly or indirectly, fraudulent, corrupt, exploitative, collusive or otherwise unethical activities. Suppliers are expected to conduct themselves in a manner that is fair, professional, free from bias and that will not bring CSC or its associated entities into disrepute. Suppliers must exercise due care and responsibility. This includes employing robust processes and controls that enable due diligence to be undertaken on their own suppliers and third parties.

Suppliers must not use, or seek to use, information gained in connection to working with CSC for financial gain or non-financial gain or for any other purpose other than what the information was provided for. Suppliers must adhere to confidentiality agreements where these exist.

Conflicts of Interest

Conflict of interests include any personal interest or duty of the supplier or its employees that conflict with their diligent and proper delivery of goods and services to CSC's benefit. Suppliers must disclose to CSC any situation that could constitute a conflict of interest, such as CSC members or employees having significant professional, private or financial advantages or interests in any of the supplier businesses. Suppliers should also proactively manage conflicts or potential conflicts arising from employees' previous engagement in the Commonwealth sector. CSC may seek to terminate its contract with a supplier where they fail to disclose a conflict of interest, or where a conflict cannot be managed to CSC's reasonable satisfaction.

Whistleblower Protections

Suppliers must establish and maintain whistleblower policies to encourage and provide means for employees to report concerns/complaints of unethical and potentially unlawful activities in the workplace. These concerns must be documented, investigated and all valid complaints addressed. Suppliers must ensure the individual's anonymity throughout any complaints process and take steps to protect complainants from threats of reprisal, intimidation and harassment.

Fair Competition

Suppliers will conduct their business in line with all applicable competition and anti-trust laws.

Responsible Artificial Intelligence

Artificial Intelligence (AI) is rapidly transforming how we work and operate our businesses. Our Suppliers must adopt ethical, safe and transparent approaches to AI adoption that aligns with [Australia's AI Ethics Principles](#), ensuring that they stay abreast of changes in legislation and regulatory standards. We expect our Suppliers to act responsibly when implementing AI solutions, to be accountable for their AI decisions, and to engage transparently with their customers whenever AI is used in their products and service delivery. Specifically, our Suppliers must ensure that their AI technologies do not put people's privacy at risk, nor expose them to discriminatory or biased AI generated outputs or decisions.

International Trade

Suppliers must comply with export control regulations applicable to their business and provide accurate and truthful information about it to customs/local authorities as and when required.

Good Record-Keeping

Suppliers should maintain detailed records that accurately record all financial transactions and information regarding their business activities, labour, health and safety and environmental practices in accordance with applicable laws, policies, and procedures. Disclosure of information must be undertaken without falsification or misrepresentation. The supplier must make relevant records available to CSC on reasonable request so that CSC can comply with record keeping and/or transparency obligations under Commonwealth law.

Taxation Obligations

Suppliers must comply with their tax obligations in Australia and overseas, by paying the right amount of tax and engaging with government authorities on taxation matters in a transparent, timely and complete way.

Prompt Supplier Payment

CSC is committed to the timely payment of its suppliers, especially Australian small businesses, and reports its performance under the *Payment Times Reporting Act 2020* (Cth). Suppliers should ensure that their own suppliers are paid within the agreed payment terms, that any Australian small businesses are paid within 20 days, and that they encourage any of their own suppliers to also do the same.

Valuing People & Human Rights

Modern Slavery

CSC is required to report on modern slavery risk in its operations and supply chains under the Australian Modern Slavery laws. Suppliers to CSC must implement policies and procedures aimed at identifying and reducing the risk of modern slavery and must report any concerns to CSC. Suppliers must provide all reasonable assistance to CSC to satisfy the reporting obligations of CSC, including completing and submitting a self-assessment questionnaire as requested by CSC. See the section 'Complying with this Code' for further information on our reporting requirements.

Fair Treatment of All

CSC promotes equal opportunity of employment and the equal treatment of all employees. CSC works with suppliers who value and respect all people, whether they be engaged directly or through third parties. Suppliers must promote a diverse and inclusive workplace free of discrimination including in relation to gender, age, race, nationality or ethnic origin, disability, family responsibilities, marital status, medical or irrelevant criminal record, political views, pregnancy or potential pregnancy, religious beliefs or activity, sexuality or sexual orientation, union affiliation, physical appearance, social origin or carers' responsibilities. CSC also encourages suppliers to look for opportunities to improve gender equality in the workplace and support a diverse and inclusive workforce. Suppliers must not unfairly or unlawfully dismiss employees.

Freely Chosen Employment

Suppliers' operations and supply chains must avoid any form of slavery, servitude, human trafficking, or forced or compulsory labour. This includes the use of bonded, indentured or involuntary prison labour; and practices such as withholding personal property, passports, wages, training certificates, work or any other document for illegitimate reasons.

Zero Tolerance for Child Labour

Suppliers must not use any child labour in any of their operations or supply chains. Child labour is commonly defined as work that deprives children of their childhood, their potential and their dignity.¹ It is work that is unsuitable for children because it is dangerous or exploitative. Australian and International standards and laws concerning the employment of persons under the age of 18 years should be applied across supplier operations if those local laws would set a lower standard or younger minimum age for the allowable type of work.

Lawful Payment of Wages and Benefits

Suppliers must pay workers lawful wages, including for overtime and equal pay for equal work. They must also provide fair working conditions for employees, including adequate rest periods, leave entitlements, superannuation, and freedom of association, union membership, and collective bargaining where required in accordance with local laws.

¹ See International Labour Organisation: [What is child labour \(IPEC\) \(ilo.org\)](https://www.ilo.org/what-is-child-labour).

Workplace Health & Safety

Worker health, safety and well-being is important to CSC. Suppliers are expected to provide a healthy and safe work environment and integrate sound health and safety management policies, practices and training into their businesses. Suppliers will ensure that employees understand their obligations to report incidents and hazards to protect themselves and others.

Workplaces Free from Harassment and Abuse

Supplier workplaces must promote anti-bullying and harassment conditions. Suppliers must ensure that their operations and supply chains are governed by policies and monitoring arrangements that sustain workplaces free of harsh and inhumane treatment, free from any sexual harassment and abuse, physical punishment or torture, mental or physical coercion, verbal abuse of employees, or the threat of any such treatment.

Responsibilities to Communities and Environments

Respect for Local Communities

CSC encourages its suppliers to contribute positively to the communities and environments in which they operate, contributing to healthy and safe living conditions. The support of local job creation, local sourcing, and education provisioning and infrastructure development is encouraged.

Indigenous Communities

CSC encourages our suppliers to extend business opportunities to Aboriginal and Torres Strait Islander peoples where possible. A list of registered companies with at least 50 per cent Indigenous ownership can be found at the Supply Nation website.

Protecting Environments

Suppliers must commit to harm minimisation measures in the natural environments in which they operate, and champion environmental stewardship and energy conservation within their operations and supply chains. Suppliers must comply with all applicable laws and regulations relating to the environment, including any management and reporting obligations. This includes ensuring the proper and legal storage, transit and disposal of hazardous substances.

Regulatory Compliance

Suppliers will conform their practices to accepted industry standards, maintain and comply with all permits, certificates, licenses and registrations required for the business' lawful operation.

Transparency and Disclosures

Suppliers are encouraged to report externally about their economic, social and environmental impact in line with the principles set forth in this Code.

Sustainable Business Practices

Suppliers should maintain environmentally responsible policies and practices and identify opportunities to incorporate sustainable environmental practices in their operations. The suppliers should, whenever possible, try to reduce emissions in their supply chain.

Working with CSC

Continuous Improvement

CSC values commitments to continuous improvement within our operations and that of our suppliers. Suppliers should set performance objectives, execute and implement plans and correct deficiencies identified by internal or external assessments, audits and performance reviews.

Information Security & Member Privacy

Suppliers must protect the confidentiality and integrity of CSC data and information they handle and notify CSC in the event of a data breach. Suppliers will adhere to all contractual requirements to safeguard CSC's confidential information and data assets including recovery point and time objectives. Suppliers must cooperate with CSC in providing information and documentation regarding their security controls to aid CSC's ability to comply with regulatory requirements.

Suppliers must comply with all Australian privacy laws and regulatory requirements where personal information is collected, stored, processed, transmitted, and/or shared. Suppliers must retain CSC's data, including our members' personal data, within Australia unless CSC has been provided with all necessary assistance to review the arrangement and has provided written consent otherwise.

Operational Risk & Business Continuity

Suppliers must proactively manage and maintain their operational risk and implement mitigating controls where weaknesses are identified. Suppliers are encouraged to implement, test and enhance business continuity plans for operations supporting CSC's businesses to protect the availability of the services. Where CSC requires these plans, the supplier must work cooperatively with CSC to identify, report and mitigate continuity risk to CSC.

Effective Risk Management

Suppliers must implement mechanisms to regularly identify, evaluate and manage risk of non-compliance with the Code. Suppliers will maintain a corporate risk management framework which includes social, ethical, safety and environmental risks into their management processes. Risks should generally be borne by the party best placed to manage them and suppliers should not inappropriately transfer risks, including down their supply chain.

Acceptable Use of Property

When accessing CSC premises and using CSC equipment Suppliers must abide by CSC's policies and procedures, including the Acceptable Use of ICT Equipment and CSC's Code of Conduct. Any property or equipment supplied by CSC must be used for legitimate CSC business activities only.

Complying with the Code

Promoting the Code

Suppliers will develop, implement and maintain appropriate training measures to allow their managers and employees to gain an appropriate level of knowledge and understanding of the laws, regulations and international standards that underpin compliance with the Code.

Monitoring Compliance

CSC will work closely with suppliers to achieve compliance with the Code and expects suppliers to remain transparent with CSC on any risk of non-compliance. CSC reserves the right to verify a supplier's compliance to this Code. CSC may carry out verifications via supplier self-assessment questionnaires, through request for further information, and site visits or audits.

Reporting Breaches & Concerns

Where the supplier becomes aware of any actual or suspected breaches of the Code within their operations or supply chain, they must immediately (within 48 hours) notify CSC in writing, cooperate and willingly participate with CSC to remedy the breach in a timely and effective manner. This includes reporting concerns of anything that could adversely affect CSC's reputation or the supplier's contractual obligations to CSC, such as notifying CSC of any investigations related to supplier operations or supply chains. Questions and notifications can be directed to Procurement.Services@csc.gov.au.

Document Version

Version	Date	Author	Approver
1.0	Nov 2021	Procurement Services	COO
2.0	Nov 2024	Procurement Services	Head of Finance

Annexure – CSC and its associated entities

Commonwealth Superannuation Corporation (CSC) and its associated entities include:

- Commonwealth Superannuation Corporation ('CSC') (ABN 48 882 817 243)
- Public Sector Superannuation Scheme ('PSS') (ABN 74 172 177 893);
- Commonwealth Superannuation Scheme ('CSS') (ABN 19 415 776 361);
- Public Sector Superannuation Accumulation Plan ('PSSap') (ABN 65 127 917 725);
- Military Superannuation and Benefits Scheme ('MSBS') (ABN 50 925 523 120);
- Australian Defence Force Superannuation Scheme ('ADF Super') (ABN 90 302 247 344);
- ARIA Investments Trust ('AIT') (51 484 956 137);
- ARIA Property Fund ('APF') (44 682 603 202);
- PSS/CSS A Property Trust ('PCA') (ABN 53 508 925 207);
- PSS/CSS B Property Trust ('PCB');
- ARIA Co Pty Ltd ('ARIA Co.') (ABN 49 123 399 057);
- PSS/CSS Investments Trust ('PCIT'), comprised of PSS International Investments Fund (ABN 65 440 705 775), CSS International Investments Fund (ABN 77 190 699 383) and Combined Investments Fund (ABN 88 991 028 460); and
- ARIA Alternative Assets Trust ('AAAT') (ABN 84 599 839 363).