



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

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, 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](#).

Professional Integrity and Conduct

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

Conflicts of Interest

In accordance with CSC's [Conflicts Management Policy](#), 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.

Whistle blower Protections

Suppliers must establish and maintain whistle blower 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 fair trading and anti-trust laws.

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.

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 risk of modern slavery, and must report any concerns to 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. 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 and collective bargaining where required in accordance with local laws.

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,

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

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.

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, and 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.

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.

Privacy of CSC Members and Staff

Suppliers must comply with all Australian privacy laws and regulatory requirements where personal information is collected, stored, processed, transmitted, and/or shared. Where any CSC information is proposed to be transferred or stored outside of Australia, suppliers must fully disclose this to CSC prior to any such action.

Information Security

Suppliers must protect the confidentiality and integrity of CSC information they handle and the availability of services they provide to CSC. Suppliers will adhere to all contractual requirements to safeguard CSC's confidential information and data assets.

Suppliers are encouraged to implement appropriate business continuity plans for operations supporting CSC's businesses. Where CSC requires these plans as part of contractual obligations, the supplier must work cooperatively with CSC to identify and report continuity risk to CSC.

Effective Policies and Practices

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.

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 risk of modern slavery in supplier operations or supply chains. Questions and notifications can be directed to Procurement.Services@csc.gov.au.

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).