

External Partners and Suppliers' Code of Conduct

April 2024

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Medibank acknowledges Aboriginal and Torres Strait Islander peoples as the First Peoples of this nation. We proudly recognise Elders past, present and emerging as the Traditional Owners of the lands on which we work and live. We're committed to equitably empowering a prosperous and strong Indigenous business sector within the Australian business ecosystem, through meaningful and sustainable trade relationships.



**‘We aim to do
business in a way
that brings out the
best in the people
we work with.’**

Better together

At Medibank, our vision of 'The best health and wellbeing for Australia' is what drives us every day. We're a health company working to create Better Health for Better Lives by providing the best health and wellbeing experience for people across Australia. But as much as it's about what we do, how we do it is equally important. We carefully select our External Partners and Suppliers because we know, no matter who they are or what they do, they too represent who we are as a company.

This Code of Conduct (Code) outlines our expectations when working together. These expectations are grounded in our company values and are a guide for how we interact, what shapes our decisions and how we support our customers and wider community.

All of us have a role to play when it comes to doing the right thing. Compliance with this Code is expected from all our External Partners, and anyone affiliated with them in connection with the supply of goods and / or services to or on behalf of Medibank and / or our customers.

Who we are

For the purpose of this Code, 'Medibank' refers to all entities which are part of the Medibank Group, including but not limited to Medibank Private Limited, ahm and Amplar Health.

Who you are

The term 'External Partner' in this Code encompasses all suppliers, agents and partners who are associated with Medibank for the provision of goods and / or services to or on behalf of Medibank and / or its customers.

Never go it alone

Working collaboratively with our External Partners is integral to our overall business success. We're here to support all our External Partners when it comes to compliance with this Code, aligning on performance expectations, encouraging sustainable innovation and building mutually beneficial relationships.

In return, all Medibank employees will abide by our employee Code of Conduct, vision, purpose and values. External Partners can and should expect fair, ethical and professional conduct from all Medibank employees at all times.

Occasionally, we may reach out to inform External Partners of version changes and updates to documentation such as this Code.





The Four Pillars

Responsible, reliable and respectful business practices are key to forming mutually beneficial relationships with our External Partners.

Ethics and social responsibility

Doing the right thing is important. We always aim to do business in an ethical and socially responsible way and we expect the same in return.

Our External Partners are required to:

- conduct business in a sustainable, ethical, fair and professional manner, free of bias, unfair advantage or any other type of conduct which may cause financial or reputational loss or harm to individuals;
- foster a culture of diversity and inclusion with respect to its operations as well as the engagement of its suppliers and partners;
- conduct its business in alignment with [Medibank's Human Rights Policy](#);
- comply with all laws, regulations, standards and industry best practices relating to data protection, privacy, anti-bribery, anti-corruption and fraud;
- declare to Medibank at the earliest convenience any and all ethical misconduct or conflicts of interest, either actual, potential or perceived.

People

Better health for better lives starts from the inside out. That's why we aim to do business in a way that brings out the best in the people we work with.

Our External Partners must comply with all laws, regulations and standards in relation to:

- the engagement of personnel including its employees, consultants, contingent labour hire, contractors and sub-contractors;
- provision of employment benefits;
- employment conditions and compensation, ensuring no employees or contractors are paid less than a living wage;
- equal opportunity in the workplace, fair treatment and anti-discrimination in the workplace (including actions to strive towards gender equality, LGBTQIA+ inclusion, religious and cultural diversity, accessibility for people with disability and inclusion of Indigenous peoples);
- workplace health, safety and wellbeing;
- whistle-blowing and grievance reporting;
- human rights - not engaging in or being associated with any form of modern slavery including but not limited to child labour, forced, bonded or compulsory labour and / or human trafficking.

Environment

A healthy environment means a healthier future for everyone. We think it's important to conduct business in a way that will help protect and improve the world we share for generations to come.

We expect our External Partners to:

- establish and maintain internal frameworks regarding the environmental impact of its business and management of such impact;
- comply with all relevant laws, regulations, standards, internal frameworks and industry best practice as they relate to the environmental impact of the External Partner's business;
- take all reasonable steps to minimise environmental impact, including but not limited to reducing energy, water, waste and emissions generated by its business operations and protecting biodiversity.

Governance, records and collaboration

External Partners are expected to maintain responsible internal governance and be open and transparent with Medibank on matters including:

- establishment and maintenance of processes for measuring, managing and reporting on the External Partner's environmental, social and economic performance relating to its business (including waste and emissions);
- management and control of risks associated with the External Partner's operations and supply chain;
- implementation and maintenance of information security processes and systems to safeguard the data of Medibank, its partners and its customers, and reporting of all related information security breach incidents to Medibank without delay (and within regulatory reporting regime timelines);
- collaborate and provide reasonable assistance and relevant information to assist with any regulatory investigation, audit or requests that relate to our External Partner's role with any Medibank data.
- any compliance or performance data report regarding the External Partner's business with Medibank, including with respect to the External Partner's compliance with this Code;
- advising Medibank of any changes to the External Partner's contact or accounting details.



‘Our vision of ‘The best health and wellbeing for Australia’ relies on our relationships inside and outside our company.’



Quality

External Partners are expected to comply with all agreements with respect to the quality of goods and services provided to or on behalf of Medibank; this includes provisions relating to the handling, use, management and security of information collected, used, stored, managed, processed or disclosed under their arrangements with Medibank.

External Partners who do not have a formal agreement with Medibank in place are expected to consistently provide high quality goods and services to or on behalf of Medibank, in line with industry best practice and this Code. We also expect these partners to meet performance expectations contained in formal agreements in a timely manner.

Medibank is to be notified of quality issues and / or recalls identified by the External Partner as soon as possible. External Partners should also not do or permit any act that will cause us to be in breach of any applicable laws or which may cause any detriment to our reputation.

Speaking up

We always aim to act with integrity, trust and accountability. Sometimes, this means having the courage to do and say difficult things. We expect External Partners to notify Medibank at their earliest convenience of risks and issues to the External Partner which have the potential to impact Medibank business operations, brand, security of information and / or customer experience. This includes, but is not limited to operational downsizing or closures, mergers and acquisitions, supply continuity impacts, legal proceedings, data breaches, fraud or corruption, stop work activity, cybercrime activity, WorkCover reportable incidents, EPA reportable incidents, and other macro impacts (e.g. geopolitical unrest, climate change, pandemic).

External Partners should report risks and issues to their Medibank Representative.

How we act today is how we're seen tomorrow

The success of Medibank and our ability to achieve our vision of 'The best health and wellbeing for Australia' relies on our relationships inside and outside our company.

We greatly value our External Partners and seek to engage others who share our commitment to environmental sustainability and social and economic responsibility.

External Partners are required to comply with all applicable national and international laws, regulations, standards, codes of practice and sanctions regimes.

Medibank expects our External Partners to cascade similar code of conduct requirements throughout its supply base, sub-contractors and partnerships, in an inclusive and accessible manner that can be understood.

Where Medibank has concerns regarding compliance by an External Partner with the expectations set out in this Code, it will discuss these concerns with the External Partner. In the event that the External Partner is unable to address or resolve Medibank's concerns, Medibank will evaluate its ongoing engagement of the External Partner in light of its concerns and may, where appropriate, elect to cease such engagement.

**Let's do the right thing
when doing business together.**

How to report a concern

External Partners who have concerns regarding fair, ethical and / or responsible conduct should report details of their concerns to our whistleblower hotline.

Reports can be made anonymously, or you can nominate limits on who can be informed. You can read our Whistleblower Policy [here](#).

Medibank Alert

Toll Free Hotline: 1800 453 411 (24 hours / 7 days)

Email: medibankalert@deloitte.com.au

