

# Vendor Code of Conduct for Australia and New Zealand

## Introduction

This Vendor Code of Conduct outlines the minimum standards and expectations for all vendors, contractors, and business partners (collectively referred to as "Vendors") who conduct business with PERSOL | Programmed in Australia and New Zealand. Our commitment to ethical, sustainable, and socially responsible practices is central to our operations, and we expect our Vendors to align with these principles.

Through adherence to this Code, Vendors are not only ensuring compliance with relevant legal frameworks but also supporting a culture of mutual respect and integrity. This Code reflects our dedication to building partnerships that prioritise ethical behaviour, sustainable development, and social equity. Vendors play a crucial role in helping us meet these goals, fostering long-term collaboration and contributing to the betterment of communities across Australia, New Zealand, and beyond.

This Code is informed by a broad range of Environmental, Social, and Governance (ESG) principles that are increasingly essential to responsible and resilient supply chain management. These include commitments to human rights, the prevention of modern slavery, workplace health, safety and wellbeing, environmental sustainability, ethical conduct, and diversity and inclusion. It aligns with relevant legislation such as the Modern Slavery Act 2018 (Cth) in Australia, alongside New Zealand's existing legal frameworks relating to employment, human rights, and criminal conduct. The Code also reflects the expectations set out in the [Persol Supplier Code of Conduct](#), [Programmed Contractor Essentials](#), and the [Contractor Handbook](#). Vendors are expected to actively incorporate these principles across their operations and supply chains, supporting PERSOL | Programmed's values and contributing to shared ESG outcomes.

Vendors are expected to integrate these standards into their operations and supply chains to ensure ethical and responsible practices.

## Ethical Business Practices

This section establishes the importance of adhering to ethical principles in all business dealings, including compliance with laws, anti-corruption, and fair competition.

## Compliance with Laws and Regulations

Vendors must comply with all applicable laws and regulations in Australia and New Zealand, including but not limited to:

- Anti-bribery and anti-corruption laws such as the Criminal Code Act 1995 (Cth) in Australia and the Crimes Act 1961 (NZ).
- Fair competition and consumer protection laws, such as the Competition and Consumer Act 2010 (Cth) and the Commerce Act 1986 (NZ).
- Taxation and trade regulations, ensuring accurate reporting and payment of all taxes and duties.

Additionally, Vendors are expected to proactively stay informed about any updates or changes in these laws and regulations, ensuring ongoing compliance in their business operations.

## Anti-Corruption and Bribery

Integrity is a cornerstone of business. Vendors must:

- Prohibit offering, giving, soliciting, or receiving bribes or other improper payments made with the intention of influencing or rewarding commercial decisions
- Avoid conflicts of interest and disclose any situation that may appear as a conflict.
- Maintain accurate and transparent records of all transactions.

Bribery, fraud, or any other form of corruption undermines the integrity of our business relationships. Vendors are encouraged to implement internal policies, training, and monitoring systems to prevent and address these issues.

In addition to the above, the broader guidelines around [Anti-Bribery and Corruption, Gifts and Entertainment](#) must be adhered to.

## Fair Competition

Fair competition ensures a level playing field for all. Vendors must engage in fair and transparent business practices by:

- Avoiding collusion, price-fixing, and other anti-competitive behaviours.
- Competing fairly and in compliance with applicable trade and competition laws.
- Promoting fair competition benefits all stakeholders by creating a level playing field and fostering innovation.

Vendors should work to ensure compliance not only within their operations but also within their broader supply chains.

## Human Rights and Labour Standards

This section underscores the fundamental commitment to respecting human rights, eradicating modern slavery, and fostering equitable workplace conditions.

### Respect for Human Rights

Vendors must uphold and respect human rights as defined in the United Nations Guiding Principles on Business and Human Rights and local laws in Australia and New Zealand. This includes recognising the dignity, freedom, and rights of all individuals affected by their business operations.

Contractors are also bound to the [Persol Human Rights Policy](#).

### Modern Slavery Prevention

In line with the Modern Slavery Act 2018 (Cth) in Australia and alongside New Zealand's existing legal frameworks relating to employment, human rights, and criminal conduct., Vendors must:

- Prohibit all forms of forced labour, human trafficking, and child labour.
- Conduct due diligence to ensure their supply chains are free from modern slavery.
- If instances of modern slavery are identified by a vendor, they are expected to report it to their primary contact at PERSOL | Programmed, who will raise it to the Risk & Legal departments for further action.
- Complete questionnaires released by PERSOL | Programmed to monitor our Supply Chain risk.

Adherence to the [Persol Supplier Code of Conduct](#), [Programmed Contractor Essentials](#), and the [Contractor Handbook](#) is required to ensure alignment with industry-leading standards for ethical sourcing and labour practices.

Vendors are encouraged to take proactive steps, such as conducting risk assessments, establishing whistleblower channels, and collaborating with external organisations to enhance their ability to detect and eliminate modern slavery practices.

## Workplace Conditions

Safe and fair workplaces are critical. Vendors must provide fair wages, benefits, and working hours in compliance with local labour laws, including:

- The Fair Work Act 2009 (Cth) in Australia.
- New Zealand's Employment Relations Act 2000 and relevant awards or agreements.

Working conditions should prioritise not only legal compliance but also employee well-being. Vendors are encouraged to exceed minimum standards by fostering environments where workers feel valued, respected, and motivated.

## Diversity and Inclusion

Diverse and inclusive workplaces drive innovation. Vendors should:

- Foster a diverse, equitable, and inclusive workplace.
- Prohibit discrimination or harassment based on race, gender, age, disability, religion, or any other protected attribute.

Promoting diversity and inclusion enhances innovation and creates stronger, more resilient organisations. Vendors should actively engage in initiatives that promote equal opportunity and representation at all levels of their workforce.

## Health and Safety

Maintaining a safe and healthy workplace is not just a legal requirement but a moral obligation. This section covers compliance with laws, safe working conditions, and incident reporting.

## Compliance with WHS Laws

Vendors must comply with workplace health and safety (WHS) legislation, including:

- The Work Health and Safety Act 2011 (Cth) in Australia and all relevant State-based OHS and WHS Acts.
- The Health and Safety at Work Act 2015 in New Zealand.

Full details on expectations on WHS can be found in the the [Contractor Handbook](#)

## Environmental Responsibility

Environmental stewardship is a shared responsibility. This section highlights compliance with environmental laws and the adoption of sustainable practices.

## Compliance with Environmental Laws

Vendors must adhere to environmental laws and regulations in both Australia and New Zealand, such as:

- The Environment Protection and Biodiversity Conservation Act 1999 (Cth) in Australia and all relevant State based Environmental Acts.
- The Resource Management Act 1991 in New Zealand.
- Having an Environmental Management System (ISO14001) or a System to collate data, track environmental risks, incidents, and mitigation actions.

## Sustainable Practices

Sustainability is vital for future generations. Vendors are encouraged to:

- Reduce waste, emissions, and energy consumption.
- Implement practices that support water conservation and biodiversity.
- Transition to renewable energy sources and work towards decarbonisation.
- Have procedures in place (even basic ones) that address environmental harm, risk identification, responsible disposal of chemical or hazardous materials, spill management.

Environmental responsibility extends to developing innovative solutions that minimise ecological impacts while meeting operational needs.

Any material incident must be reported by the Vendor to PERSOL | Programmed at the earliest opportunity.

Vendors must actively seek opportunities to align their practices with global sustainability goals, such as the United Nations Sustainable Development Goals (SDGs).

## Responsible Sourcing and Supply Chains

Transparent and ethical sourcing is critical for a sustainable supply chain. This section emphasises the importance of ethical sourcing and supply chain accountability.

### Ethical Sourcing

Vendors must:

- Avoid sourcing materials linked to conflict zones or unethical practices.
- Conduct due diligence to ensure ethical and legal sourcing of raw materials and goods.

### Supply Chain Accountability

Accountability ensures consistency. Vendors must ensure their subcontractors and suppliers comply with this Code by:

- Communicating the requirements of this Code.
- Monitoring and auditing their supply chains to identify and address non-compliance.

## Confidentiality and Data Privacy

Safeguarding sensitive information is essential. This section addresses confidentiality and compliance with privacy laws.

### Confidential Information

Vendors must protect personal, sensitive and proprietary information by:

- Using it only for authorised purposes.
- Preventing unauthorised access, disclosure, or misuse.
- Ensuring data is not transferred or stored outside of Australia (e.g. within SaaS applications that are hosted overseas) without our written permission.
- Retaining data only for a period of time required for the primary purpose it was collected for, and ensuring processes are in place to delete data that is no longer required.

### Compliance with Privacy Laws

Data privacy is a priority. Vendors must comply with privacy laws in both Australia and New Zealand, including:

- The Privacy Act 1988 (Cth) in Australia.
- The Privacy Act 2020 (NZ) in New Zealand.

Data security is an evolving field, and Vendors must stay updated on best practices, adopting robust systems to safeguard against breaches or cyberattacks.

Any breaches must be reported to the Company at the earliest opportunity.

## Monitoring and Compliance

Regular assessments ensure adherence to this Code. This section outlines expectations for audits, assessments, and corrective actions.

### Audits and Assessments

To ensure adherence to this Code, Vendors must:

- Cooperate fully with audits, site visits, and assessments.
- Provide the requested documentation and access to relevant personnel and facilities.

### Corrective Actions

Addressing issues promptly demonstrates commitment. Vendors must address any non-compliance issues promptly by:

- Implementing corrective actions within agreed timelines.
- Reporting progress and resolution of issues.

Ongoing monitoring ensures that Vendors meet the high standards set forth in this Code, creating accountability and opportunities for continuous improvement of partnership, practices and policies.

By taking ownership of their supply chains, Vendors help create a ripple effect of ethical and sustainable practices throughout the global marketplace.

## Reporting Concerns

Open communication channels are essential for addressing unethical behaviour. This section describes reporting mechanisms and whistleblower protections.

### Mechanisms for Reporting

Vendors must report any suspected unethical, illegal, or unsafe practices through designated reporting channels. Concerns may include but are not limited to:

- Bribery, corruption, or fraud.
- Human rights violations.
- Environmental non-compliance.

### Whistleblower Protections

At PERSOL | Programmed, we are committed to ensuring that our work and services are delivered to the highest possible standard and above all else in a manner that is ethical, lawful and proper. We aim to provide a working environment that is open and which all employees are comfortable to report openly or anonymously instances of unethical, improper, unlawful or undesirable conduct without fear of reprisal or intimidation or fear.

Protection encourages reporting. Vendors and their employees are protected by whistleblower laws, such as the Corporations Act 2001 (Cth) in Australia and equivalent protections in New Zealand. Retaliation against whistleblowers is strictly prohibited.

PERSOL | Programmed supports a confidential Whistleblowing program, [Speak Up](#)

Whistleblowing serves as a vital mechanism for uncovering and addressing unethical behaviour. Vendors should educate their teams about these protections and provide clear reporting guidelines.

## Consequences of Non-Compliance

Adherence to this Code is mandatory. This section outlines the potential consequences of failing to meet its standards.

Non-compliance with this Code may result in:

- Suspension or termination of contracts.
- Removal from PERSOL | Programmed's approved vendor list.
- Legal or regulatory action, as applicable.

Our commitment to integrity demands accountability. By enforcing this Code, we ensure that Vendors meet the high ethical standards expected of all business partners.

## Commitment to Continuous Improvement

Continuous improvement fosters resilience and mutual growth. This section highlights the importance of striving for excellence in ethical, social, and environmental practices.

PERSOL | Programmed values Vendors who demonstrate a commitment to continuous improvement in ethical, social, and environmental practices. By aligning with this Code, Vendors contribute to our shared goals of integrity, sustainability, and respect for human rights.

Continual improvement fosters resilience, innovation, and mutual growth. Vendors are encouraged to seek feedback, engage in dialogue, and pursue certifications or partnerships that reinforce their dedication to excellence.

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**Acknowledgement:** By engaging in business with PERSOL | Programmed, Vendors agree to uphold the principles and requirements of this Code. This Code is integral to fostering a responsible and sustainable partnership, building a legacy of trust, transparency, and shared success.

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