

Supplier sustainability principles

QBE is committed to conducting our operations in a responsible and sustainable manner. We understand that our purchasing decisions don't only affect our performance, reputation and risk profile, they affect the economy, environment and communities in which we operate. Therefore, as part of our broader approach to sustainability, we seek to engage suppliers and partners who share this understanding and commitment, and who can work with us to achieve our objectives. The following principles set out our minimum expectations of suppliers doing business with QBE in relation to the topics identified.

Governance and general compliance

General:

- Provide accurate and reliable advice and information when required.
- Act ethically, fairly and honestly in all dealings.
- Declare any perceived or actual conflict of interest.
- Maintain an appropriate compliance program to manage all regulatory obligations.
- Review and circulate internally compliance information provided to you by QBE.
- Report promptly and without delay actual or potential breaches of compliance obligations or issues to QBE, as well as any genuine concerns you may hold about your, or QBE's adherence to laws or regulations.
- Advise QBE of any communications from a regulator or other authority regarding your conformity with their obligations.

Sanctions:

- Comply with the sanctions regimes of the jurisdictions in which you operate, including HM Treasury (UK), United Nations, US, Australian and any local sanctions that apply.
- Not engage in or facilitate any business that will lead you or QBE to breach any sanctions obligations.

Bribery and Corruption:

- Not give, offer, promise, accept, request or authorise a bribe, whether directly or indirectly, or engage in or facilitate corruption, regardless of local customs and differing business practices. The most conservative approach should prevail.

- Not make facilitation payments whether directly or through third parties.
- Not offer QBE employees commissions, payments, gifts, entertainment, hospitality, or promotional activity where it is unreasonable, excessive (including in both frequency and value), disproportionate, and not offered in good faith (for example, to improperly influence the conduct of an employee).
- Gifts and entertainment must not be offered to employees during competitive business processes, for example, during tender processes.
- Not engage in or facilitate any business that may lead to a breach of anti-bribery and corruption laws.

Privacy:

- Comply with privacy laws relating to the collection, use and protection of personal information.
- Only collect and share personal information where it's needed for legitimate business purposes or where there's a legal need to do so.
- Ensure personal information is kept safe, secure and private.
- Take all reasonable and necessary measures to prevent the disclosure of confidential QBE information and promptly notify QBE of any unauthorised disclosure.

Human rights

- Comply with all relevant local and national laws related to human rights in respect of your employees and business operations.

- Conduct your business and manage your supply chain in a manner that respects human rights as set out in the UN Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights¹.
- Have mechanisms to address any infringements or adverse impacts to human rights associated with your business activities.

Workplace practices

- Comply with all relevant local and national laws and regulations in relation to employment practices including the International Labour Organisation's eight ILO Core Conventions².
- Provide fair pay, working conditions and hours for your employees and/or contractors. These should include adequate rest periods, leave, minimum wage requirements and freedom of association including collective bargaining.
- Ensure that all employees and contractors are legally entitled to work and that no bonded, forced or involuntary labour, child labour, involuntary prison labour, human trafficking or slavery is employed in the delivery of your products or services to QBE or otherwise.
- Ensure that company facilities and resources, and within reason products and services, are not used for sexual exploitation, human trafficking and/or forced labour of any kind.
- Warrant that employees and contractors, having provided the notice agreed and in accordance with applicable labour laws, are free to resign their employment and leave the workplace.

Diversity and inclusion

- Foster an inclusive workforce and a culture of respect toward differences in gender, sexual orientation/identity, age, disability, ethnicity or appearance, marital or family status, religious or cultural background.
- Provide a workplace that is free from direct and indirect discrimination, harassment, and bullying.
- Develop, monitor and maintain workforce management systems and/or policies which include and seek to improve diversity in recruitment, equal opportunity, pay equity, anti-discrimination and anti-harassment standards. These are to meet or exceed requirements as described in applicable laws.

1 <https://www.unglobalcompact.org/library/2>

2 <http://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang-en/index.htm>

Work health safety and wellbeing

- Ensure compliance with all relevant work health and safety laws and regulations.
- Have a documented work health and safety policy.
- Provide a safe working environment and all necessary training to reduce the likelihood and impact of injury and illness at your workplace.
- Have a documented system to record, monitor and manage health and safety relative to your organisation's risk profile and applicable laws and standards.

Environmental management

- Implement and maintain an industry appropriate Environmental Management System and/or relevant processes to support compliance with any applicable environmental protection laws, regulations and/or standards.
- Set measurable targets to manage and reduce material environmental impacts of your operations, products and services (e.g. greenhouse gas emissions, energy use, water, waste) where appropriate.
- When employing primary materials or commodities, be able to demonstrate these have been sourced sustainably through appropriate certifications.

Supplier diversity

Where possible and commercially viable, QBE would like to work with businesses that reflect the diverse nature of the communities we serve including minority and first nation businesses, disability and social enterprises, female-owned and/or led businesses, our community partners and other not-for-profit businesses.

Community

- Play a positive role in the communities you operate.
- Demonstrate community support through charity leave, sponsorship of philanthropic causes and/or fundraising activities for legitimate organisations.

Raising a concern (whistleblowing)

QBE aims to maintain high ethical standards and expects our suppliers to act with honesty and integrity. Our suppliers play a key role in ensuring that dishonesty, corruption or other illegal or inappropriate behaviours, conduct or activities that may impact QBE are reported so they can be dealt with appropriately. In the first instance, you are encouraged to raise your concerns directly with QBE at regulatory@qbe.com. Alternatively, QBE provides a confidential hotline (1800 452 994 in Australia), operated by an independent third party to encourage the reporting of such matters.