

## Supplier Code of Conduct

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**Domain Holdings Australia Limited**  
(ACN 094 154 364)

Adopted 27 June 2019

# Supplier Code of Conduct

## Introduction

This Supplier Code of Conduct (**Code**) sets out the minimum standards that Domain Holdings Australia Limited and its subsidiaries comprising the Domain Group (**Domain**) expect of their suppliers.

Domain expects its suppliers to comply with social, environmental and ethical standards of behaviour, comply with legislation and meet the required standards of the International Labour Organisation (**ILO**) and the Australian Human Rights Commission.

## Application

This Code of Conduct applies to all entities that supply goods or services to Domain (**Suppliers**). Domain expects all of its Suppliers to ensure (a) that they comply with the Code; (b) that their own supply chain complies with the Code; and (c) that suitable management systems and processes are implemented to ensure and measure compliance with the Code.

We expect our suppliers to communicate this Code to their related entities, employees, suppliers and sub-contractors so that they are aware of, understand and comply with this Code.

## Compliance with Law

Suppliers must comply with all local, national and other applicable laws and regulations of the jurisdictions in which they operate. The standards outlined in this Code do not replace or alter any legal or regulatory obligations of Suppliers.

## Labour and Human Rights

At Domain, we respect our teams, customers and business partners. We strive to work collaboratively and value the contributions of others. We respect differences of opinion. We treat people fairly to build a trusting work environment. We perform our duties in an honest and transparent manner to maintain a good reputation, personally and for Domain. We are responsible, honest and accountable in our dealings with each other, our customers and audiences. We expect our Suppliers to align with these principles.

In particular, we expect our suppliers to:

- **Human rights:** Conduct their activities in a manner that respects human rights;
- **Wages:** Comply with applicable laws and regulations relating to remuneration and benefits, including minimum wages, overtime, superannuation, leave entitlements and other benefits, and ensure the timely payment of workers. Pay their workers

equal pay for equal work.

- **No forced labour:** Not engage in or tolerate the use of forced, bonded, compulsory labour, slavery or human trafficking, the use or threat of physical or other punishment, or the physical, sexual or psychological abuse or inhumane treatment of workers.
- **No child labour:** Comply with international and local obligations relating to the employment of children, including adhering to the minimum legal working age in their jurisdiction or the standards set by the International Labour Organisation, whichever is higher. Ensure children under the age of 18 are not employed in hazardous work or in work incompatible with their development.
- **Working conditions:** Provide fair working conditions for their employees.
- **Working hours:** Maintain working hours that are reasonable and not excessive.
- **Safe environment:** Promote and maintain a workplace that is free from violence, threats of violence, bullying, harassment, discrimination, inhumane treatment or abuse;
- **Health and safety:** Promote a working environment that protects workers' health and wellbeing as well as ensuring there are safe work practices. All employees should have access to appropriate and clean workplace facilities;
- **No discrimination:** Seek to eliminate discrimination including on grounds of race, colour, sex, age, religion, political opinion, national extraction, sexual orientation, disability, legal status or social origin and promote equality of opportunity and treatment; and
- **Associations:** Respect workers' freedom of association, recognise and protect their right to collective bargaining and to form, join and administer workers' organisations.

## Health and Safety

At Domain, we are committed to providing a healthy and safe workplace for all people involved in our business operations, whether they are employees, contractors, labour hire, volunteers or visitors to our premises or events.

We fulfil this commitment by implementing measures to support compliance with all applicable work health and safety legislation, industry standards, and best practice in the management of health and safety issues affecting the workplace.

We expect our suppliers to operate with a similar level of care and commitment towards the health and safety of the people operating in their workplaces. Suppliers must identify and comply with relevant workplace and product health and safety laws and ensure their workers understand and follow health and safety policies, standards and procedures that apply to their work and industry.

In particular, we expect our suppliers to:

- Comply with all relevant national and local health and safety legislation including health and safety management and reporting;

- Take reasonable steps to actively identify and manage workplace health and safety risks, through the identification of hazards, evaluation of their risks and implementation of effective risk controls;
- Provide appropriate training, education and resources to all employees to enable them to carry out their duties safely and assist them in understanding their roles and responsibilities in relation to workplace health and safety; and
- Building and maintaining a culture that encourages employees to actively participate in health and safety initiatives and supports workers to raise health and safety issues or concerns without fear of disciplinary action, dismissal or discrimination.

## Environmental Considerations

At Domain, we take our responsibility to care for and protect the environment seriously. We aim to minimise the environmental impacts of our operations, products and services and expect our Suppliers to do the same.

In particular, we expect Suppliers to demonstrate that they:

- Adopt environmental standards that meet or exceed applicable legislative and regulatory requirements and relevant standards or codes of practice;
- Implement environmental management processes that identify, control and where possible reduce environmental impact and continually assess the environmental impacts of their operations;
- Minimise waste through efficient use of materials and in particular,
  - minimise the use of energy, water and raw materials where possible;
  - maximise recyclable and sustainable materials;
  - practical efforts should be made at all times to minimise waste and disposable should be done in an environmentally responsible manner;
- Avoid contamination to the local environment and minimise emissions and pollution (air and noise); and
- Set internal improvement targets for environmental performance.

## Ethics, Anti-bribery and Corruption

Domain demonstrates clear ethical standards and behaviour throughout the organisation through compliance to our policies, procedures and values. Domain expects the same standards of behaviour from its Suppliers when dealing with Domain and in their other business dealings.

All Suppliers must have appropriate policies and procedures in place in relation to money laundering, insider trading, conflicts of interest, fraud, bribery and corruption as well as the improper payments and/or gifts.

Suppliers must comply with all applicable anti-bribery and anti-corruption laws. Domain does

not permit or condone bribes, pay-offs, secret or unjustified commissions or payments, kickbacks, improper gifts or any such similar payment or improper benefit. This includes payments to or from any person (including public officials, foreign officials, foreign political parties or candidate for foreign political office) for the purpose of assisting a party to obtain or retain business for or with, or to direct business to, any person. This applies even if it is legal or common practice in the country in which the Supplier operates.

## Privacy

Domain is bound by the Australian Privacy Principles contained in the *Privacy Act 1988* (Cth) and other applicable data protection laws, including the EU General Data Protection Regulation (**GDPR**). At Domain, privacy matters and compliance with privacy laws is a non-negotiable part of how we work.

We expect our Suppliers to have adequate data privacy and security protection to protect against the unauthorised access, use and disclosure of personal information.

Suppliers must not do anything that would cause Domain to act or be perceived to be acting inconsistently with the [Domain Privacy Policy](#).

## Conflict of Interest

Domain has an employee [Code of Conduct](#) that requires our employees to declare any situations of conflict which would include any conflict of interest that is associated with the procurement of goods or services from a Supplier.

If a Supplier is linked to an employee whether by shareholdings, family relations, friendship etc Domain may require the employee to abstain from any Supplier selection decisions.

## Social Responsibility

Domain is an active participant in the community through its people, products, services and public affairs. We encourage our Suppliers to support the local communities in which they operate through appropriate community initiatives.

## Continuous Improvement

We encourage our Suppliers to go beyond minimum compliance to applicable laws and this Code and to take responsibility to continually improve social and environmental conditions and ethical behaviour.

## Monitoring and Compliance

Suppliers must monitor their compliance with this Code and promptly notify Domain of any breaches, allegations of non-compliance or investigation into non-compliance by authorities. Suppliers must take all reasonable steps to address, remedy and prevent any further breaches.

Domain reserves the right to review compliance with this Code and require Suppliers to co-

operate and provide information we may reasonably require to perform such a review. In some circumstances, we may require Suppliers to complete an annual declaration which confirms their compliance with this Code.

If a Supplier, or another party in its supply chain, is unable to, or fails to, comply with this Code, Domain will discuss this issue with the Supplier and may require the Supplier to take such steps as Domain considers necessary to address the impact of, and remediate, the non-compliance, or in some cases Domain may terminate the relevant Supplier agreement.

## Application of this Code

If a Supplier's contractual arrangements contain more detailed requirements in respect of any principles covered in this Code, this Code is intended to supplement (and not override) those contractual obligations.

## Raising a Concern

Suppliers can raise concerns about any actual or suspected breach of this Code by emailing [supplychain@domain.com.au](mailto:supplychain@domain.com.au).

If you become aware of a breach of this Code involving an employee of Domain including, financial malpractice, fraud, bribery or corruption, and you do not feel comfortable speaking to someone at Domain about it, you may contact Domain's Whistleblower hotline provider, Stopline, on 1300 30 45 50 (from within Australia) or via email to [domain@stopline.com.au](mailto:domain@stopline.com.au).