

## Supplier Code of Conduct

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

Adopted 21 May 2024

# 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 and provide a fair and ethical workplace, which upholds high standards of human rights, and integrate appropriate labour and human rights policies and practices into our business. We believe that all workers in our supply chain deserve to be treated with dignity. 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, protects and fulfils human rights and fundamental freedoms;
- **Wages:** Comply with applicable laws and regulations relating to remuneration and benefits, including minimum wages, overtime, superannuation, workers compensation, leave entitlements and other benefits; pay workers equal pay for equal work; ensure the timely payment of wages; and not use wage deductions as a disciplinary measure;

- **No fees:** Not require their staff to pay fees, charges, expenses or incur financial obligations in order to secure their employment or placement;
- **Identity documents:** Not destroy, control or exclusively possess the travel or identity documents of personnel;
- **No forced labour:** Not engage in or tolerate the use of forced, bonded or 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; and 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, victimisation, inhumane treatment or abuse in any form, including verbal, physical, sexual or psychological;
- **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, ethnicity, colour, sex, age, marital status, religion, political opinion, national extraction, sexual orientation, gender identity, disability, union affiliation, legal status or social origin and promote equality of opportunity and treatment;
- **Associations:** Respect workers' freedom of association, and recognise and protect their right to collective bargaining and to form, join and administer workers' organisations;
- **Grievances:** Ensure there are channels for people to raise concerns and access remedy, and that where potential harm is identified it is investigated and addressed;
- **Manage risks:** Proactively identify, address and, where required by legislation, report on risks of Modern Slavery practices (defined broadly to include all forms of human trafficking, forced labour and slavery-like practices) in business operations and supply chains; and
- **Training:** Ensure personnel responsible for managing the Supplier's operations and supply chains have undertaken suitable training to be able to identify and report Modern Slavery.

## 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, consultation 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
- Build and maintain 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;
  - Implement practical efforts at all times to minimise and dispose of waste in an environmentally responsible manner;

- Avoid contamination to the local environment and minimise greenhouse gas emissions, pollution (air and noise), loss of biodiversity, deforestation and damage to ecosystems;
- Ensure the safe storage, transportation and disposal of hazardous substances including hazardous waste; 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.

Suppliers are expected to be ethical in their business activities, including relationships, practices, sourcing and operations, and to act honestly, responsibly and transparently. 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 Domain into disrepute by association.

Suppliers must comply with all applicable anti-bribery, anti-corruption and anti-money laundering laws and 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.

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. Suppliers are expected to maintain accurate and auditable financial and business records, in accordance with all applicable legal and regulatory requirements.

Suppliers are also expected to observe all relevant trade bans, restrictions, sanctions and boycotts that apply to areas in which the Supplier and the Supplier's supply chain operates.

## Privacy and Confidential Information

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 is of critical importance 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 any unauthorised access, use and disclosure of personal information, including personal information disclosed by Domain during the course of its business dealings with the Supplier.

Suppliers must not do anything that would cause Domain to act or be perceived to be acting

inconsistently with the [Domain Privacy Policy](#).

The integrity and security of Domain's confidential information is of utmost importance to Domain. Suppliers must not improperly use any private, confidential or commercially sensitive information in its possession relating to or in connection with its dealings with Domain.

## Conflict of Interest

Suppliers must not engage in conduct or misuse a position with the intention of obtaining an advantage for themselves or for another person, or cause, or seek to cause detriment to Domain or to any other person. Supplier business activities must be free from unmanaged conflicts of interest. Where actual, potential or perceived conflicts of interest are identified, they must be declared and managed appropriately.

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 with applicable laws and this Code, and to take responsibility to continually improve their social and environmental conditions and standards of ethical behaviour.

## Monitoring and Compliance

Suppliers must monitor their compliance with this Code and should perform periodic evaluations of their facilities, operations and supply chains. Suppliers must promptly notify Domain of any breaches of this Code, or allegations of non-compliance or investigation into non-compliance by authorities. Suppliers must take all reasonable steps to address and remedy any identified breaches, as well as 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. Disclosure of information to Domain in connection with this Code must be undertaken without falsification or misrepresentation.

Domain requires Suppliers to complete periodic declarations confirming acceptance of this Code, and may, in some circumstances, also require periodic confirmation that there have been no identified instances of non-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).

Any person who becomes aware of a breach of this Code, including a breach involving an employee of Domain, and does not feel comfortable being identified or speaking directly to someone at Domain about it, may contact Domain's Whistleblower hotline provider, Stopleveline, on 1300 30 45 50 (from within Australia) or via email to [domain@stopleveline.com.au](mailto:domain@stopleveline.com.au).

In addition to ensuring breaches of this Code are reported to Domain, Domain expects its Suppliers to maintain their own grievance process for workers to report misconduct, violations, grievances or other concerns without fear of detriment, including complaints or grievances about Modern Slavery practices in a manner that is consistent with the criteria set out in the United Nations' Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework available at [https://www.ohchr.org/documents/publications/guidingprinciplesbusinessshr\\_en.pdf](https://www.ohchr.org/documents/publications/guidingprinciplesbusinessshr_en.pdf).