

SUPPLIER CODE OF CONDUCT

Zip Group Zip Co Limited ABN 50 139 546 428 and its subsidiaries (“Zip Group”) are committed to operating our business lawfully and ethically. We are committed to upholding all applicable laws regarding corporate social responsibility, workplace safety protection and staff inclusion and diversity. We expect our suppliers to do the same, including operating under all applicable modern slavery, labour and human rights laws.

Purpose of the Code

This Supplier Code of Conduct (“Code”) sets out our expectations for the conduct of our suppliers that relates to modern slavery, labour and human rights. A supplier is an entity or person that provides goods or services to us.

This Code reflects our support of International Labour Organization (“ILO”) standards.

Code of Conduct

From our suppliers, we expect compliance with applicable local laws and the principles outlined in our Code.

Compliance with applicable laws

Suppliers must comply with laws of the countries in which they operate.

Labour and Human Rights

We expect our suppliers to be committed to upholding the human rights of its workers in their operations and supply chains.

All work must be voluntary, and workers must be free to terminate their employment in accordance with an employment agreement provided in the workers native language. There shall be no unreasonable restrictions on workers freedom of movement including any restrictions on entering or exiting any company provided facility.

Suppliers shall not withhold, otherwise destroy or conceal or deny access to workers government issued identification documents, passports, work permits, travel documents, or the like, unless such holdings are expressly required by an applicable law.

Suppliers shall use all reasonable endeavours to ensure that third party recruitment agencies are compliant with the provisions of this Code. Workers shall not be required to pay employers or their agents' any recruitment fees to obtain their employment. If any such fees are found to have been paid by workers, subsequent to the adoption of this Code by a Zip Group supplier, they must be repaid as soon as reasonably practicable, which will generally be understood to mean within 90 days of such discovery.

If applicable, suppliers are expected to exercise due diligence on relevant materials in their supply chains. Suppliers shall develop particular due diligence policies and management systems in order to identify applicable modern slavery risks and take appropriate actions to mitigate them. Where required by relevant legislation, Suppliers are expected to report on risks of modern slavery practices (including all forms of human trafficking, forced labour and slavery-like practices) in their business operations and supply chains.

Workplace Health and Safety

Suppliers shall comply with relevant workplace and health and safety laws and ensure their workers and suppliers have appropriate safety policies, standards and procedures in place. Suppliers are required to provide safe environments for workers, visitors and third parties and provide regular health and safety training to all workers.

Child Labour

Suppliers shall not employ workers who are under 15-years-old or the minimum age for employment in the country, whichever is greater. The supplier may provide legitimate workplace apprentice programs for educational benefit provided they are consistent with relevant International Labour Organization Standards.

Suppliers employing workers under the age of 18 must not require any such employee to perform work that may jeopardise their health or safety having particular regard to their age, maturity and ordinary life experience.

Working Hours

Supplier's workers hours shall not exceed the maximum set by applicable local laws which should align with International Labour Organization Standards.

Wages and Benefits

Compensation paid to workers of the Supplier shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates.

The Supplier shall communicate pay structure and pay periods to all workers in their native language. Wage deductions shall not be used as a disciplinary measure. All use of temporary and outsourced labour shall be within the limits of applicable local laws.

Humane Treatment

All workers in the Zip Group's supply chain deserve to be treated with dignity and respect. The Supplier agrees to provide a fair and ethical workplace that is free from harsh and inhumane treatment including sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, victimisation, or verbal abuse of workers; nor is there to be the threat of any such treatment under any circumstances whatsoever. Suppliers are to ensure that disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

Anti-Discrimination

The Supplier must comply with relevant discrimination laws and shall not discriminate against any worker based on age, disability, ethnicity, gender, marital status, national origin, political affiliation, race, religion, sexual orientation, union membership or any other status protected by law in hiring and other employment practices such as promotions, rewards, and access to training.

Freedom of Association and Collective Bargaining

The Supplier shall respect the rights of all of its workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly, as well as giving corresponding respect to the right of workers to refrain from engaging in any such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management in their native language regarding working

conditions and management practices without fear of discrimination, reprisal, intimidation or harassment.

Environmental Sustainability

Suppliers must comply with applicable international, national and state laws and standards in relation to environmental management and the protection of the environment.

Suppliers must exercise due diligence on the sourcing of materials and ensure their sourcing practices relevant to the services provided to Zip are ethical and are in accordance with human rights and relevant laws.

Conflicts, Gifts and Honesty

We expect our suppliers to have in place appropriate processes to raise and manage conflicts within their businesses. Whilst at times, Suppliers do provide gifts, benefits or hospitality to Zip staff, these should not be given in order to entice or obtain any unfair or improper advantage.

Suppliers should:

1. Inform us of any actual or potential conflicts of interest that impact Zip.
2. Act ethically and honestly and be transparent in all their dealings.
3. Not offer Zip employees or any related person or company excessive gifts or entertainment which contravenes the Zip Conflict of Interest Policy.

Data Protection and Privacy

Our suppliers must put appropriate measures in place to ensure the confidentiality of any Zip related data.

Suppliers should:

1. Comply with data privacy and confidential information and security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.
2. Protect the reasonable privacy expectations of personal information obtained

3. Not use or disclosing any information belonging to Zip, its customers, other suppliers, employees and other third parties, except as required or authorised by Zip.

Operational Principles

We expect our suppliers to take reasonably practicable steps to:

- implement the principles of this Code (which may include, where appropriate, due diligence on its own supply chains);
- identify, address and remedy potential breaches of applicable laws referred to in this Code;
- if it becomes aware that it has not conducted itself consistently with the principles of this Code, report this to us;
- influence its own supply chain to minimize and mitigate the modern slavery and support human and labour rights, this includes informing its workers and its supply chains of our Code.

Managing Breaches

In circumstances where we become aware that suppliers have not conducted themselves consistently with the principles of this Code, we may exercise a range of options available to us, which may include the right to terminate the arrangement (on a case-by-case basis). However, we are also committed to influencing and improving supply chains where breaches may have occurred. Our oversight of our supply chain is set out in our Joint Modern Slavery Statement.

The Supplier shall also allow us to perform (to the extent reasonably practicable) and assist with Zip's investigations relating to breaches of this Code (including allowing reasonable access to records).

Grievance, Whistleblowing and Management

Subject to the governing jurisdiction, the Supplier shall have appropriate practices in place to ensure ongoing compliance with this Code and ensure that workers can make complaints and grievances without fear of disadvantage, intimidation or reprisal in accordance with our Whistleblower Policy.

In addition to our investigation procedure under its Whistleblower Policy, the Supplier shall also allow us to perform, to the extent reasonably practicable, periodic evaluations of its

facilities and operations and shall to the extent reasonably practicable, allow us access to records of any grievance relating to modern slavery upon written request.

Further Information

Please contact Zip's ANZ Risk and Compliance team at complianceteam@zip.co.

Version Control

Variations

This version of the Policy supersedes all previous versions.

Document Title	Supplier Code of Conduct Policy
Use	Internal use only
Policy and Procedure Owner	This Policy is owned by the ANZ Risk and Compliance team who has final authority to change or make amendments to this document
Senior Manager Function (SMF) Accountability	Claire Nelson, Director Compliance
Policy and Procedure Contacts	Nathan Woll, Senior Manager, Risk
Document Author	Claire Nelson, Director Compliance
Version	2.0
Original Issue Date	June 2021
Last Review Date	29 November 2023
Next Review Date	November 2025