NBN® SUPPLIER CODE OF CONDUCT

October 2026

At NBN Co, we are firmly committed to conducting our business with the highest standards of ethical and social responsibility to protect the rights and wellbeing of individuals and the environment across our supply chain.

This code of conduct (Code) reflects the principles embraced by nbn to act in pursuit of this commitment and outlines how we endeavour to conduct our business to enhance the wellbeing of the communities and the environment in which we operate.

We trust that our suppliers share, and will work with us to promote, the principles outlined in this Code which are intended to emphasise and promote our shared commitment to ethical, safe, socially and environmentally responsible practices and behaviours.

In this Code, the 'supplier' means the supplier and its associates. 'Associates' includes employees, subcontractors, other group entities, officers, agents and other parties in their supply chain or who perform services for or on behalf of nbn.

This Code sets out some basic principles of good corporate behaviour. We expect our suppliers to ensure that they and their associates are aware of, understand and comply with the practices set out in this Code when providing goods or services to, or on behalf of nbn.

For questions relating to this Code or our expectations of suppliers, please contact **supplierpolicies@nbnco.com.au**

HUMAN RIGHTS AND WORKPLACE RELATIONS

We expect our suppliers to commit to respect the human rights of all people who they may impact including their own workers, workers in their supply chain and community members.

In relation to workers, this includes an expectation that suppliers will seek to respect the rights to freedom of association, freedom from forced and compulsory labour, freedom from child labour, freedom from discrimination in respect of employment and occupation, the right to a safe and healthy workplace and rights in relation to working hours, wages and benefits.

Our minimum standards are:

Child and underage labour

Child labour is not permitted in our supply chain.

The minimum age for employment or work is the higher of: (i) the minimum age for employment in the relevant country in which the work is being performed; and (ii) the standards set by the International Labour Organization.

Children under the age of 18 must not be employed in work that:

- is mentally, physically, socially or morally dangerous and harmful (including hazardous work such as work with dangerous machinery or handling heavy loads, work that exposes them to hazardous substances or temperatures or noise levels, or work for long hours or during the night); and/or
- interferes with their right to education

Modern slavery

Modern Slavery in any form is not permitted in our supply chain. Modern Slavery includes forced, bonded or compulsory labour, servitude, human trafficking, deceptive recruiting practices and the worst forms of child labour.

Our suppliers must not require their workers to provide money as a condition of their employment and any recruitment-related fees or expenses must be paid by our suppliers and not their workers.

Additionally, workers' government-issued identification, passports or work permits must not be retained by suppliers and, to the extent that any such documents are required to confirm workers' identities or working rights, they must be returned to the relevant worker immediately afterwards.

All work must be voluntary, and members of our suppliers' workforces must be free to leave their employment on providing reasonable notice in accordance with applicable laws and regulations.

Freedom of association and collective bargaining

Our suppliers must respect the rights of their workers to be free to decide on joining trade unions or similar workers' organisations and to be free of any discrimination, harassment, intimidation, or victimisation for their choice to join these organisations or engage in other lawful industrial activity.

Working hours, wages and benefits

Working hours for our suppliers' workforce must not be excessive in light of the relevant role and must comply with the laws and regulations in that country in respect of working hours, rest periods and periods of leave.

Any overtime work suppliers require their workforce to perform must be in accordance with applicable laws and regulations.

Our suppliers must comply with applicable laws, regulations and industrial instruments relating to wages and benefits (including minimum wages and overtime pay) and in ensuring that the supplier's workforce is paid in a timely manner.

We expect our suppliers to ensure that all members of their workforce understand their employment conditions and when determining these employment conditions, consideration should be given to the type of work to be performed, the market rate for that type of work and any statutory minimum wage in that country.

Discrimination, harassment and abuse

We expect our suppliers to act with dignity and respect toward their workforce and to build a safe workplace, including by promptly taking action against inappropriate workplace behaviour.

Our suppliers should not engage in or tolerate discrimination on any unlawful ground, including their identity, including due to gender (or gender identity or expression), physical, mental, or intellectual abilities, race, ethnicity, age, sexual orientation, intersex status, relationship status, family or carer's responsibilities, pregnancy, breastfeeding, culture and identity, religious or political beliefs, nationality, or social origin.

Our suppliers should not use or tolerate threats, acts of violence, bullying, harassment (including sexual harassment), victimisation, vilification or physical, mental, verbal or sexual abuse in its dealings with their workers or when providing goods or services to, or on behalf of, nbn.

Diversity, equity and inclusion

At nbn, diversity, equity and inclusion are fundamental to the way we work, the relationships we build, and how we deliver for our customers, communities and each other.

Our suppliers should seek to adopt, where appropriate, practices which promote diversity and inclusion within their workforce and supply chain.

Some of the ways that we promote diversity and inclusion within our organisation include:

- implementing a Diverse, Respectful and Inclusive Workplace policy and strategy that is currently focused on:
  - fostering an inclusive workforce culture across nbn and developing inclusive leadership capability in our leaders;
  - increasing female participation in our workforce, particularly within senior leadership roles;
  - increasing First Nations representation at all levels in our workforce;
  - implementing measures to identify and eliminate gender pay gaps;

    building an accessible and inclusive workplace to assist those with disabilities to participate fully in the workforce;
  - supporting the awareness and inclusion of lesbian, gay, bisexual, transgender, intersex and other gender diverse employees;
  - celebrating the cultural and ethnic diversity of our workforce.
- facilitating equal employment opportunities based on ability, performance and potential;
- maintaining and, where possible, growing our relationships with existing First Nations-owned suppliers, and actively pursuing opportunities to engage new First Nations businesses in line with our procurement policies;
- establishing initiatives to support inclusive and flexible work practices, including through paid parental leave and flexible work arrangement policies;
- implementing an Accessibility and Inclusion Plan, and signing up to the Australian Disability Network's Accessible Technology Charter;
- integrating accessibility requirements into our procurement processes for relevant goods and services; and
- integrating equitable approaches into our key processes within nbn, including recruitment, training, performance management, reward, communication, stakeholder engagement, and product development.

HEALTH, SAFETY AND ENVIRONMENT (HSE)

Protecting the health and safety of workers within our supply chain, and the environment, is a commitment considered above all other business matters. We value our employees, contractors, customers, suppliers and environment in which nbn operates.

Our suppliers must in carrying out the Supplier's activities:

- maintain a physically and psychologically safe and healthy workplace;
- protect the natural environment and places of heritage value in areas where work is conducted;
- comply with all health and safety, environmental, and cultural heritage laws and regulations;
- implement continuous improvement and management systems to ensure compliance and effective controls;
- provide all necessary supervision, training, instruction, equipment, resourcing and information to all workers;
- monitor and evaluate HSE performance, investigate issues and implement actions to prevent their reoccurrence;
- listen to, consider and, where practical, address community and customer HSE concerns related to work carried out for nbn;
- where reasonably practicable, adopt early intervention programs and rehabilitation to prevent injuries and illness;
- where reasonably practicable, consult with workers, suppliers and subcontractors on issues that may affect their physical or psychological health and safety;
- do all things reasonably necessary to reduce greenhouse gas emissions of supplied products and services by improving energy efficiency and where reasonably practicable use renewable energy sources;
- where reasonably practicable, apply circular economy and environmental design principles to supplied products and services to minimise the use of natural resources and reduce the generation of waste.

Construction
partner of
nbn

nbn

ETHICAL BEHAVIOUR AND GOOD BUSINESS PRACTICES

Business integrity

We expect our suppliers to act with the highest of ethical standards and with professionalism, honesty, integrity and fairness in every aspect of their business. This includes:

- being beyond reproach in matters of trust, honesty and confidentiality;
- behaving in a fair and consistent manner in all dealings;
- respecting cultural, ethnic and religious differences;
- acting responsibly to mitigate risk and safeguard customers, employees, brand, reputation, assets, premises and resources;
- promoting socially and environmentally responsible, sustainable procurement and supply chain management practices;
- having a grievance mechanism available for workers and other stakeholders to raise concerns;
- preventing or avoiding situations that give rise to any actual, potential or perceived conflict of interest with nbn's interests or the provision of goods or services to, or on behalf of, nbn and promptly advise nbn of any such conflicts that arise.

Fraud, corruption and whistleblowing

We are committed to the proactive prevention, identification, assessment, evaluation, monitoring and management of fraud and corruption risks. Bribery, fraud and corruption are not tolerated by nbn.

Our suppliers must not engage in any form of corruption, including extortion, fraud, bribery or improper influence, and must comply with all laws and regulations including those relating to bribery, corruption and prohibited business practices.

As part of the provision of goods and services to nbn, our suppliers' officers, employees and subcontractors are regarded as public officials and therefore subject to the legislative requirements under the National Anti-Corruption Commission Act 2022 ('NACC Act').

Knowledge or genuine suspicion of fraud, bribery, improper influence or corruption should be reported promptly to the nbn Fraud Management and Investigations team at **fraudandinvestigations@nbnco.com.au**

nbn's 'Whistleblower Policy' (available at nbn.com.au) is another available reporting channel further outlining the obligations in relation to the NACC Act. It contains legislatively supported mechanisms to ensure genuine concerns regarding potential misconduct or an improper state of affairs in relation to nbn, including any wrongdoing, or maladministration or suspected unethical or unlawful conduct can be disclosed anonymously or otherwise without fear of reprisal or detrimental conduct and with the support and protection of nbn.

Resilience and business continuity

At nbn, resilience and business continuity are important foundations for delivering access to a highly available secure and resilient broadband network. Our supply chain is a key enabler to this. We expect our suppliers to have a robust resilience and business continuity program to understand and prepare for known and emerging business disruption risks appropriate to their business, operating environment and upstream supply-chain.

Our suppliers must be able to demonstrate the ability to recover their business operations from disruptive events to mitigate or limit any impact on the supply of goods or services to nbn and promptly notify nbn of any significant disruption that may impact such supply. Additional risk controls and resilience requirements may be communicated to suppliers depending on the nature and criticality of goods or services being supplied to nbn.

Security and privacy

At nbn, safeguarding security and privacy is essential to maintaining a safe and secure network and ensuring compliance with obligations under the Privacy Act. Our suppliers are a key contributor to these functions.

We expect our Suppliers to have robust security practices in place that are aligned with industry best practice/standards/frameworks commensurate with the services they provide.

As a provider of Critical Infrastructure, nbn must adhere to Australian regulatory and legislative requirements and, depending on the service, Suppliers must also comply with these requirements as applicable. If a Supplier becomes aware of a Security incident such as a data or network breach, the Supplier must immediately notify nbn in accordance with their contractual requirements.

We expect our Suppliers to appropriately protect nbn and customer information and only utilise the information for the specific service nbn has engaged them to deliver. Suppliers must handle personal information lawfully and securely, comply with all applicable privacy laws and regulations and implement appropriate measures to protect personal information.

Artificial Intelligence

nbn is committed to developing and using AI safely, ethically, and transparently. We expect our suppliers to develop and use AI in a responsible, ethical, and accountable manner, ensuring AI systems are safe, fair and transparent. We expect our suppliers to have robust AI management practices in place that are aligned with industry best practice / standards / frameworks commensurate with the services they provide.

Confidentiality and intellectual property

We expect our suppliers to respect all nbn and third party confidentiality and intellectual property rights, and to take appropriate steps to protect and maintain the confidentiality of all nbn confidential information to which it has access. Our suppliers should only use nbn's confidential information and intellectual property in accordance with their contractual arrangements with nbn.

Publicity and advertising

Our suppliers must not:

- use nbn's name or logos in publicity or advertising;
- use the suppliers' business relationships with nbn to imply any endorsement by nbn of the suppliers' goods or services; or
- make any representation or statement for, or on behalf of, nbn, without our prior written consent.

Trade sanctions

Our suppliers are expected to comply with all economic and trade sanctions in accordance with applicable laws and regulations.

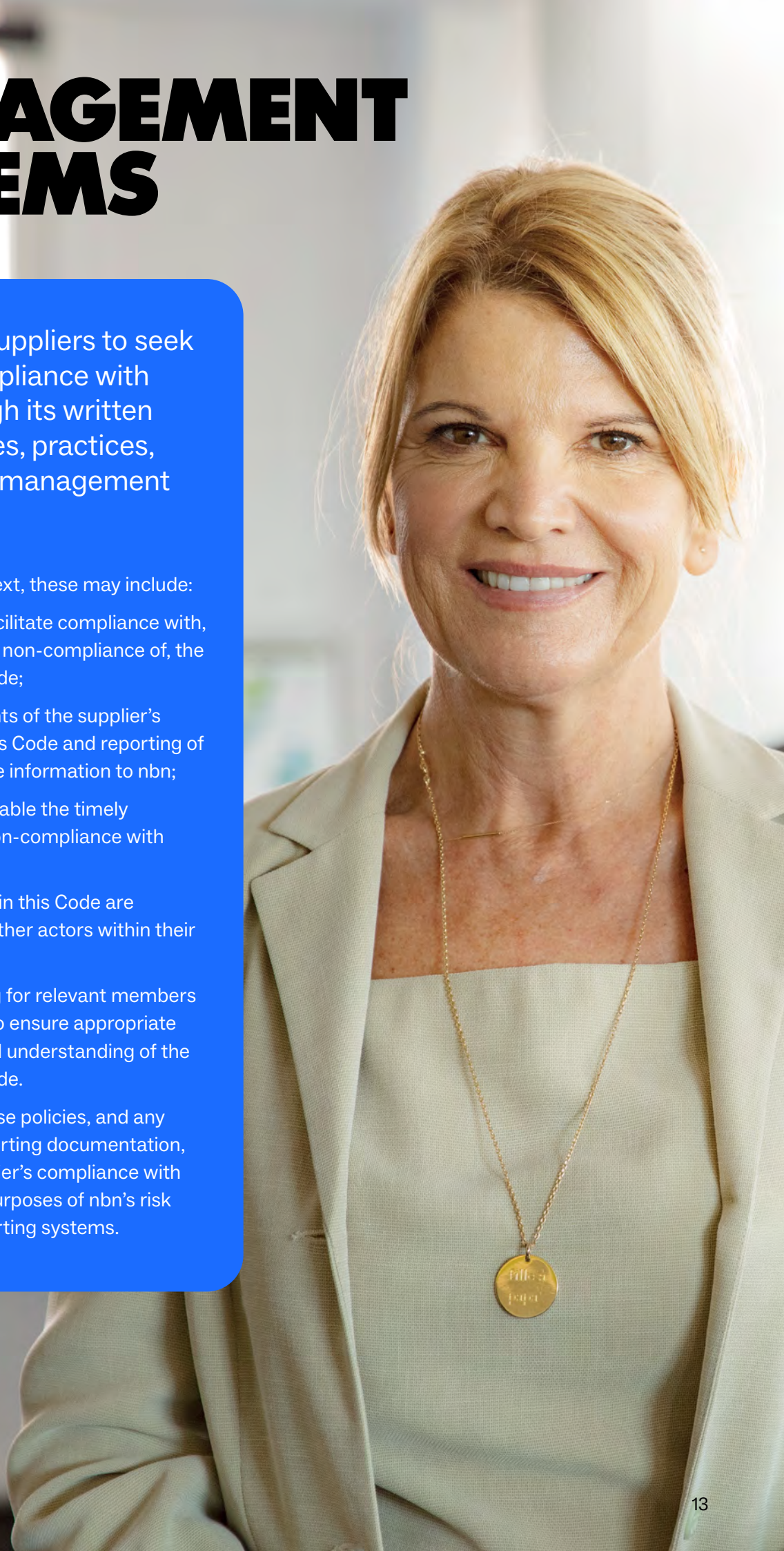
MANAGEMENT SYSTEMS

We expect our suppliers to seek to facilitate compliance with this Code through its written corporate policies, practices, procedures and management systems.

Depending on the context, these may include:

- processes which facilitate compliance with, and identify risks of non-compliance of, the principles in this Code;
- periodic assessments of the supplier's compliance with this Code and reporting of relevant compliance information to nbn;
- processes which enable the timely correction of any non-compliance with this Code;
- ways the principles in this Code are communicated to other actors within their supply chain; and
- appropriate training for relevant members of their workforce to ensure appropriate communication and understanding of the principles in this Code.

nbn may ask to see those policies, and any other reasonably supporting documentation, to demonstrate a supplier's compliance with this Code and for the purposes of nbn's risk management and reporting systems.



NBN AND THE CARETAKER CONVENTIONS

Caretaker conventions apply to nbn in the lead up to the Federal elections.

These conventions may impact timings of tenders or nbn's ability to enter binding commitments during the caretaker period, and may also result in a tender being revised or cancelled. For further information about Caretaker Conventions see

www.pmc.gov.au/resource-centre/government/guidance-caretaker-conventions

THE CODE

Application of this Code

This Code is formally incorporated into our contracts with all of our suppliers. To the extent that our 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.

Independent Whistleblower Service

nbn's Whistleblower Policy provides information on nbn's independent, confidential hotline and reporting service that can be used by suppliers and their workers, and other stakeholders, to make a disclosure or raise a concern.

The current version of the Whistleblower Policy can be found at

www.nbnco.com.au/corporate-information/about-nbn-co/policies/corporate-policies

Compliance with this Code

In some circumstances, we may require our suppliers to complete self-assessments and/or an annual declaration which confirms their compliance with this Code.

Our suppliers must promptly notify nbn if they become aware or reasonably suspect that they or another party in their supply chain is unable to comply with the principles in this Code.

If a supplier is unable to, or fails to, comply with this Code, nbn will discuss this issue with the supplier and may require the supplier to take such steps as nbn considers necessary, acting reasonably and only requiring steps that are proportionate to the relevant failure to meet this Code, to address the impact of, and remediate, the non-compliance. Where a supplier is not willing to address and/or remediate the non-compliance, nbn may consider terminating its relationship with the supplier.

Feedback and review

As part of nbn's continuous improvement culture, this Code is subject to ongoing review. nbn appreciates feedback from suppliers including suggestions for improvement.

The current version of this Code can be found at

www.nbnco.com.au/corporate-information/about-nbn-co/suppliers#tab4

For matters relating to this Code, please contact **supplierpolicies@nbnco.com.au**

© 2026 nbn co ltd. 'nbn', 'Sky Muster', 'business nbn' and nbn logos are trade marks or registered trade marks of nbn co ltd | ABN 86 136 533 74

27-O-M-497