

Supplier Code of Conduct

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Sedgwick Australia Supplier Code of Conduct

This Sedgwick Australia Supplier Code of Conduct (**the Code**) outlines the principles and standards of conduct that Sedgwick expects vendors/suppliers, their employees, subcontractors, and sub-suppliers to meet during the provision of goods and services to Sedgwick Australia (**Sedgwick**). To support compliance with the Code, vendors/suppliers shall ensure that the Code is shared with all individuals assigned to perform work for or on behalf of Sedgwick and/or Sedgwick clients, and that all related tasks are executed by individuals with the skills, expertise and certifications necessary to uphold the principles and meet the standards of the Code.

1. Compliance with Supplier Code of Conduct

Suppliers, Vendors, Consultants and their employees, agents and subcontractors (collectively referred to as “Suppliers”) must adhere to this Code while conducting business with or on behalf of Sedgwick. Suppliers must promptly inform Sedgwick via the email address below when any situation develops that causes the Supplier to operate in violation of this Code. Sedgwick may audit Suppliers or inspect Suppliers’ facilities to confirm compliance. Suppliers agree to participate in any required training offered by Sedgwick specific to this Code.

2. Treating Customers Efficiently, Honestly and Fairly

Suppliers must conduct all dealings with customers in an efficient, honest and fair manner, acting with integrity, professionalism and due care at all times. Suppliers are expected to communicate clearly, provide accurate and timely information and make decisions that prioritise fair customer outcomes. Suppliers must take reasonable steps to identify, recognise and appropriately respond to circumstances that may indicate a customer is experiencing vulnerability, including but not limited to financial hardship, family or domestic violence, mental or physical health conditions, disability, age-related challenges, language or literacy barriers, cultural factors, significant life events, or any other circumstance that may impair a customer's ability to engage effectively or make informed decisions.

Where vulnerability is identified, suppliers must apply appropriate support measures, exercise empathy and flexibility, and ensure customers are not disadvantaged as a result of their circumstances. When a customer vulnerability is identified, this should be recorded, as outlined in procedures. Such records must be limited to objective and observable facts, together with information voluntarily provided by the customer and must not contain assumptions, opinions, diagnoses, speculation or personal judgements regarding the customer's circumstances. Suppliers must ensure that all records are accurate, relevant, respectful and maintained in accordance with applicable privacy and confidentiality obligations.

3. Legal and Regulatory Compliance

Suppliers will comply with all applicable local, national and international laws, regulations, and industry standards, including,

without limitation, those pertaining to the manufacture, pricing, sale and distribution and safety of the relevant products and/or services. In the event that the requirements of these Standards are stricter than applicable local, national or international law, Suppliers will comply with these Standards. However, if there is any conflict between the requirements of these Standards and the requirements of any applicable local, national or international law, Suppliers are to comply with the local, national or international law. Suppliers will notify Sedgwick in writing of any such conflicts. Suppliers are required to timely report to Sedgwick actual or suspected violations of these Standards or applicable laws by anyone acting on Sedgwick's or the Suppliers' behalf.

4. Data Privacy and Confidential Information

Suppliers must strictly limit and safeguard the confidential information belonging to Sedgwick and any third parties, including any information created, received, or learned by Suppliers whilst engaged for or on behalf of third parties and shall only use confidential information as far as permitted by Sedgwick and third parties.

Suppliers must:

- Ensure any personal data is kept safe, secure, and private, and protected from misuse or unauthorised disclosure.
- Comply with the requirements of the Sedgwick Privacy Policy and any other related security policies and standards when notified and provided by Sedgwick.
- Comply with applicable privacy laws.

5. Business Practices and Ethics

Sedgwick Suppliers must conduct their business interactions and activities with integrity and must, without limitation, address:

Business Integrity

Corruption, extortion, embezzlement, and other questionable/inappropriate business practices, in any form are strictly prohibited. Suppliers shall not violate any international anti-corruption conventions, and applicable anti-corruption laws and regulations of the countries in which they operate, and shall not engage in corruption, extortion, or embezzlement in any form. Suppliers shall not offer bribes or other means to obtain an undue or improper advantage. Suppliers shall under no circumstances tolerate the giving or receiving of undue reward to influence the behavior of another individual, organization, politician or government body, so as to acquire a commercial advantage; this extends to all operations, regardless of whether bribery is officially tolerated and condoned. Suppliers must conduct business in a fair and ethical manner in all aspects of their business. This includes maintaining confidentiality over all Sedgwick client sensitive and confidential information.

Gifts and Conflicts of Interest

Sedgwick and many of its clients have policies limiting gifts to colleagues. Suppliers shall abide by these policies. The Sedgwick Gifts policy prohibits Sedgwick colleagues from accepting personal gifts, entertainment, favors of significant value, or engaging in private business or professional activities where there is or would appear to be a conflict between the individual's private interests and the interests of Sedgwick. Colleagues cannot accept gifts of cash or cash equivalents (e.g., gift cards). Sedgwick colleagues must avoid accepting a gift or series of gifts or business courtesies where circumstances might create or appear to

create an expectation that the acceptance is in exchange for favorable business decisions. Suppliers should avoid situations that appear or actually create a conflict of interest or appearance of impropriety for Sedgwick colleagues. For more information, refer to the Sedgwick Gifts policy and any applicable Sedgwick client policy.

6. Labour Practices and Human Rights

Sedgwick expects its Suppliers to share its commitment to human rights and equal opportunity in the workplace. Sedgwick has a zero-tolerance commitment to all forms of slavery, forced labour, debt bondage, child labour and human trafficking within its supply chain. All Sedgwick Suppliers must conduct their employment practices in full compliance with all applicable laws and regulations.

Discrimination, Harassment and Bullying

- Cooperate with Sedgwick's commitment to create a culture and a business environment based upon inclusion, mutual respect, responsibility, and understanding. Suppliers will not discriminate in hiring and employment practices, including salary, benefits, advancement, discipline, termination or retirement, on the basis of race, religion, age, nationality, social or ethnic origin, sexual orientation, gender, marital status, political opinion, disability, or any other category protected by law. Suppliers will treat each employee with dignity and respect and will not use threats of violence or other forms of physical, sexual, psychological or verbal harassment, abuse or intimidation.

Child Labour and Forced Labour

- Suppliers shall not use child labour unless this is part of a government-authorised job training or apprenticeship program that would clearly be beneficial to the persons participating so as long as these programs comply with all applicable laws and regulations.
- Suppliers shall not use forced labour, regardless of its form.

Worker Entitlements

- At a minimum, Suppliers will comply with all applicable wage and hour laws and regulations, including those relating to minimum wages, overtime, maximum hours, piece rates and other elements of compensation, and provide legally mandated benefits.

Freedom of Association

- Suppliers must ensure that workers' rights to freedom of association and collective bargaining are respected, and that workers have the right to form and join trade unions, in accordance with local laws.

Modern Slavery

- Suppliers must not use modern slavery practices in their operations or supply chain.
- Suppliers must notify Sedgwick as soon as it becomes aware of any instance of modern slavery taking place in its supply chain or in any part of its business.
- Support Sedgwick to identify areas of high-risk modern slavery in supply chains, investigate risks and if applicable, contribute toward and sponsor corrective actions.
- Support Sedgwick in any other way required to meet its obligations under the Australian *Modern Slavery Act 2018 (Cth)*.

7. Health and Safety

Sedgwick Suppliers are expected to integrate sound health and safety management practices into all aspects of business, and must, without limitation provide a safe working environment that supports accident prevention and minimizes exposure to health risks. Suppliers are expected to comply with all applicable safety and health laws and regulations in the countries in which they operate.

8. Environmental Sustainability

Sedgwick is committed to environmentally responsible and sustainable work practices. We acknowledge and believe that Sedgwick can mitigate significant environmental impacts, through effective claim management, supply chain management, legal compliance and stakeholder involvement. Suppliers are expected to minimise the environmental impact of their operations, and maintain environmentally responsible policies and practices.

Suppliers must comply with all applicable laws and regulations relating to the environment, including any management, and reporting obligations. Suppliers are expected to manage the environmental impact of their operations by:

- Continuous improvement of their environmental and social performance;
- Communications of all environmental risks, aspects and impacts before, during and after a project and additionally highlighting the control measures;
- Ensuring the safe storage, transportation and disposal of hazardous substances including any waste stream generated on claims and specifically hazardous waste;
- Committing to explore alternative waste disposal options in line with the waste hierarchy principles i.e. recycling, reuse, resource recovery, salvage and repurpose solutions;
- Maintaining policies and practices for the efficient use of energy, water, and natural resource consumption;
- Have sufficient financial means to remedy cost associated with environmental incidents i.e. legal costs, clean-up and remediation works; and
- Maintaining policies and practices that reduce the risk of pollution, loss of biodiversity, deforestation, damage to ecosystems and greenhouse gas emissions.

9. Risk Management and Governance

Risk Management

At Sedgwick, we work with our Suppliers to better understand how to manage and reduce risk and to build resilience. We expect our suppliers to:

- Demonstrate appropriate risk management and governance to ensure compliance with applicable laws and accounting practices.
- Ensure recovery and continuity of services to Sedgwick arising from a disruption to their services, where appropriate.
- Protect Sedgwick data from loss, misuse or damage, including but not limited to, sensitive data and Sedgwick client data.
- Notify Sedgwick immediately if they become aware of any association with politically exposed persons.
- Maintain appropriate certifications including insurance, regulatory and industry certifications to meet their obligations to

Sedgwick.

Governance

Suppliers are expected to maintain adequate records that accurately record all financial transactions and information regarding their business activities, labour, health and safety, and environmental practices in accordance with applicable laws, policies, and procedures. Disclosure of information is expected to be undertaken without falsification or misrepresentation.

10. Reportable Conduct

If you wish to report questionable behavior or a possible violation of this Code of Conduct, you are encouraged to initially work with your primary Sedgwick contact in resolving your concern. If that is not possible or appropriate, please contact our Ethics line [Sedgwick Ethics Line - Powered by Convercent](#) or alternatively contact our Chief Risk and Compliance Officer.

Sedgwick will maintain confidentiality to the extent possible and will not tolerate any retribution or retaliation taken against any individual who has, in good faith, sought out advice or reported questionable behavior or a possible violation of this Code of Conduct.

2. Document Control

Version Number	Date	Comments	Approved by
1.0	March 2024	Framework recreated on new policy template, significant changes.	Chief Risk and Compliance Officer
2.0	May 2026	Rebranded	Chief Risk and Compliance Officer
2.1	August 2026	Non material changes	Chief Risk and Compliance Officer

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