

Supplier Code of Conduct

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Healthdirect Australia acknowledges the Traditional Owners of Country throughout Australia and their continuing connection to land, sea and community. We pay our respects to the Traditional Owners and to Elders both past and present.



Purpose

The Supplier Code of Conduct (“the Code”) sets out the minimum standards of ethical and responsible behaviour that Healthdirect Australia expects of its suppliers. These standards reflect Healthdirect Australia’s commitment to sustainability, ethical sourcing, and corporate responsibility and apply across key areas namely labour and human rights, diversity of suppliers, health and safety, environmental impacts, business integrity, privacy and security.

Suppliers are expected to align with the principles outlined in the Code. A supplier’s ability to demonstrate compliance with, and where possible, exceed these expectations will be a critical consideration in procurement and ongoing supplier management decisions.

Healthdirect Australia is committed to supporting the United Nations Sustainable Development Goals (SDGs) through its operations and supply chain. In alignment with this commitment and the obligations of its shareholders, Healthdirect Australia expects all suppliers to operate in a manner that upholds these shared sustainability goals.

The Code is made publicly available via the Healthdirect Australia website and is communicated to prospective suppliers during tendering and onboarding processes. For existing suppliers, the Code is reinforced through regular contract management and relationship oversight as part of Healthdirect Australia’s broader supplier governance framework.



Scope

This Code applies to all suppliers, contractors, and service providers (“Suppliers”) engaged by Healthdirect Australia, regardless of contract value, duration, or the nature of goods or services provided.

It applies to both direct, strategic suppliers and, where applicable, to their subcontractors and third-party affiliates involved in delivering products or services to Healthdirect Australia.

Compliance with this Code is expected throughout the full duration of a supplier’s engagement with Healthdirect Australia and forms part of our broader procurement and supplier governance framework. The Code is referenced during tendering, onboarding, and contract management activities and may be incorporated into contractual terms and conditions as appropriate.



Requirements

Complying with laws

Healthdirect Australia must comply with all applicable laws which include any applicable statutes, regulation, by-law, ordinance or subordinate legislation, regulation and requirement of any Australia Government agency applicable to any of the supplier, its personnel, Healthdirect Australia (whether made by a State, Territory, the Commonwealth, or a local government), and includes the common law and rules of equity as applicable from time to time. This policy requirement will be reflected in Healthdirect Australia's contracts with its suppliers.

- Suppliers are expected to comply and at all times, act in a manner consistent with the *Privacy Act 1988 (Cth)* (including the Australian Privacy Principles in Schedule 1 of the Privacy Act).
- Healthdirect Australia acknowledges that many suppliers operate across multiple jurisdictions. Suppliers must comply with all applicable laws and regulations in the countries in which they operate, including those relating to labour, human rights, anti-bribery, anti-corruption, environmental protection, and data privacy. In addition to national laws, adherence to relevant international frameworks such as those established by the *International Labour Organisation (ILO)* and the *United Nations Global Compact* are encouraged to support globally recognised standards of responsible business conduct.

Human rights and workplace conditions

Healthdirect Australia is committed to upholding the fundamental rights and dignity of all individuals across its supply chain. We expect our suppliers to provide safe, fair, and inclusive workplaces that respect human rights, promote equal opportunity, and actively prevent exploitation, discrimination, and unsafe working conditions. These expectations extend beyond legal compliance to reflect ethical business practices that foster transparency, accountability, and continuous improvement.

- Suppliers are expected to adhere to all relevant legislation and provide a working

environment that encourages behaviours that support these outcomes including:

- Suppliers must establish accessible and confidential grievance mechanisms for employees to report concerns without fear of retaliation.
- Provide training on human rights, workplace rights, and non-discrimination to all employees.
- Conduct regular audits and assessments to ensure compliance with human rights and workplace rights standards.
- Maintain transparency in operations and report on human rights and workplace rights practices.

Non-discrimination

- Healthdirect Australia requires all suppliers to implement and enforce policies and practices that prohibit discrimination based on protected characteristics as defined by law.
- Suppliers must ensure that all employment practices, including hiring, promotion and compensation, are based on merit and free from bias, including on grounds of race, colour, sex, sexual orientation, breastfeeding, gender identity, intersex status, age, physical or mental disability, marital status, family or carer's responsibilities, subsection to family and domestic violence, pregnancy, religion, political opinion, national extraction or social origin, industrial activity, union membership, irrelevant criminal record or other recognised status. Suppliers must have suitable policies and practices in place that promote equality, inclusion, and diversity.
- Suppliers must work towards identifying and removing gender pay gaps that may exist in their workplace.

Bullying, harassment, and disciplinary practices

- Healthdirect Australia requires all suppliers to implement policies and practices to prevent and address harassment (including sexual harassment) and bullying in the workplace.
- Suppliers must not use violence, threats of violence or other forms of physical coercion or harassment. Corporal punishment, mental, physical or verbal abuse, sexual harassment or sexual abuse, and harsh or inhumane treatment are prohibited.
- Suppliers must enforce appropriate disciplinary actions against individuals found to have engaged in bullying or harassment.

Freedom of association

- Healthdirect Australia requires suppliers to support open and lawful worker representation and ensure that employees can engage in collective activities without interference, discrimination or reprisal.
- Suppliers must respect a workers' right to freedom of association including the right to form and join a trade union.
- Suppliers must protect against acts of interference with the establishment, function or administration of workers' organisations in accordance with applicable laws.
- Suppliers must not discriminate, harass, intimidate or retaliate against workers for being members of a union or participating in trade union activities.
- Suppliers shall adhere to legislation, where legally required, to provide worker representatives access to information and their workplace to perform their roles.

Wages and benefits

- Healthdirect Australia requires all suppliers to uphold standards of fairness, equity, and compliance in all aspects of employee compensation and benefits.

- Suppliers must comply with applicable laws relating to wages, superannuation, and benefits (including minimum wages, overtime pay, and piece rates) defined for the Country or State/Territory the employee operates within, to prevent exploitation of the local workforce.
- Suppliers must not use deductions from wages as a disciplinary measure and must pay workers on time.
- Suppliers must provide wages that are fair and equitable, ensuring that all employees are compensated based on their role, experience, and performance.

Working hours

- Healthdirect Australia requires suppliers to foster work environments that prioritise the health, safety, and wellbeing of their employees including strict adherence to all relevant federal, state, and local laws governing working hours.
- Suppliers must ensure that working hours are managed responsibly and do not pose a risk to the health and safety of workers. In line with international best practice, including guidance from the *International Labour Organisation (ILO)*, suppliers are encouraged to adopt reasonable working hour practices that reflect the nature of the work performed, applicable laws, and employment contracts. Where extended working hours are routine, suppliers should monitor for fatigue risks and consider steps to support employee wellbeing and manage workloads sustainably.
- Suppliers need to ensure that employees are entitled to and access regular rest periods, including daily breaks, weekly rest days, and paid annual leave. Employees should be allowed at least one day off per seven-day week.

Modern slavery

- Healthdirect Australia requires all suppliers to uphold the principles of human dignity and freedom by taking proactive steps to prevent modern slavery within their operations and throughout their supply chains. This includes identifying, mitigating, and, where appropriate, reporting risks related to forced labour,

servitude, debt bondage, and human trafficking.

- Suppliers must always act consistently with relevant modern slavery legislation including the *Modern Slavery Act 2018 (Cth)*, as well as applicable international standards and obligations.
- Suppliers must proactively identify, address and where appropriate, report on risks of modern slavery (including all forms of human trafficking, forced labour and debt bondage) in their business operations and supply chains.
- Suppliers must not require workers to surrender any government issued identification, passport or work permit or other personal document as a condition of employment. In addition, workers shall not be required to pay employers' or agents' recruitment costs or any other fee for their employment.
- Suppliers must familiarise themselves with the UN Guiding Principles on Business and Human Rights and must work towards raising awareness internally to ensure compliance with their responsibilities in protecting Human Rights.

Child and underage labour

- Healthdirect Australia suppliers must ensure strict compliance with all relevant legislation and to contribute to the global effort to eradicate child labour.
- Suppliers must not engage with any vendor, supplier or other third-party arrangement that has practices which engage in child labour or exploitation.
- Suppliers will implement robust monitoring and enforcement mechanisms to ensure compliance with their policies including regular audits, inspections, and collaboration with external partners to identify and address any instances of child labour.

Financial crime

- Healthdirect Australia requires all suppliers to uphold the highest standards of integrity and ethics in their operations. Suppliers are expected to adopt a 'no-tolerance' approach to fraud

and corruption and implement comprehensive measures to prevent, detect, and respond to any such activities. These measures should include:

- **Prevention:** Establishing and maintaining policies, procedures, and training programs to mitigate the risk of fraud and corruption.
- **Detection:** Utilising systems and controls to identify potential incidents promptly.
- **Response:** Taking immediate and appropriate action to investigate and address any suspected or confirmed instances of fraud or corruption, including reporting to relevant authorities where required.
- Suppliers are expected to regularly review and strengthen their anti-fraud and corruption frameworks and practices and must cooperate fully with Healthdirect Australia in any related investigations.

Sanctions

- Healthdirect Australia requires all suppliers to comply with applicable international and domestic sanctions laws and to operate with integrity in all global transactions. Suppliers must maintain appropriate controls and due diligence processes to prevent any association with sanctioned individuals, entities, or jurisdictions.
- Suppliers must fully comply with all lawful sanction regimes affecting their business.
- Suppliers must not have dealings with designated individuals and entities (such as suspected terrorists or narcotics traffickers) who are subject to international economic sanctions).
- Suppliers must not implement effective internal controls to minimise the risk of any non-compliance with relevant sanctions regimes, including training and support for their employees and contract workers.

Anti-money laundering

- Under its Fraud and Corruption Control Policy, Healthdirect Australia must ensure that fraud and corruption risk management

is part of its third-party risk management processes before and after entering into contracts with contractors. Money laundering is categorised under fraudulent activities in the AS8001 framework. Healthdirect Australia's Fraud and Corruption aligns with AS8001.

- Suppliers must not knowingly engage or attempt to engage in any transaction involving proceeds derived from unlawful activity.
- Suppliers must perform applicable AML / CTF related responsibilities in utmost good faith and immediately report to the relevant regulatory or enforcement authority any matter suspected to be related to money laundering or terrorist financing (and then to advise Healthdirect Australia, at the first opportunity when such a disclosure is permitted).

Tax evasion

- Healthdirect Australia requires all suppliers to comply with applicable tax laws and to operate transparently and ethically in all financial dealings. Suppliers must take reasonable steps to prevent tax evasion and the facilitation of tax offences within their own operations and across their associated parties.
- Suppliers must not engage in any applicable tax evasion offences, nor should they criminally facilitate the evasion of taxes by other parties.
- Suppliers must ensure that they put in place reasonable procedures to prevent the occurrence of such offences by associated persons, including their employees, subcontractors and persons acting on their behalf.

Health and safety

Healthdirect Australia requires all suppliers to maintain a strong commitment to workplace health and safety by complying with all applicable laws, regulations, and standards in the jurisdictions in which they operate. Suppliers must implement robust systems, processes, and controls to identify, manage, and mitigate health and safety risks, and promote a culture of continuous improvement and worker engagement in maintaining safe, healthy, and compliant working environments.

- Suppliers must adhere to relevant local WHS laws and regulations, with these meeting at a minimum global standard such as ISO 45001.
- Suppliers must demonstrate active leadership commitment to creating a safe working environment.
- Suppliers must have a documented approach for systematically identifying and evaluating risks, implementing appropriate control measures.
- Suppliers must engage workers in identifying hazards and assessing risks.
- Suppliers must comply with relevant workplace health and safety laws and ensure their workers understand and follow health and safety policies, standards and procedures that apply to their work.
- Suppliers must implement effective systems to ensure products and service delivery meet relevant standards and legislative requirements, and safety considerations are considered throughout the product lifecycle.
- Suppliers must ensure facilities and amenities for workers (including any accommodation provided) are clean, safe and meet their basic needs. Basic needs include providing ready access to clean toilet facilities, potable water, and where accommodation is provided, hot water for bathing, adequate heating and ventilation, reasonable personal space and reasonable permission to enter and exit facilities.
- Suppliers must monitor the health of workers and the conditions at the workplace to prevent illness or injury of workers arising from the supplier's business activities; and
- Suppliers must support workers to raise health and safety issues or concerns without fear of disciplinary action, dismissal or discrimination.
- Suppliers must prepare for, respond to, manage and report workplace incidents, injuries and emergencies, providing medical assistance to impacted parties as required. Suppliers must have systems, training and emergency equipment in place to effectively respond to and manage incidents and emergencies.

Environmental sustainability

At Healthdirect Australia we are committed to environmental sustainability and recognise the growing global and national imperative to move towards a nature-positive future. While our immediate requirements are grounded in legal compliance and responsible environmental practices, we encourage our suppliers to understand and align with this broader direction.

Suppliers are encouraged to minimise their environmental footprint, consider the impacts of their operations on biodiversity, and explore opportunities to adopt environmentally responsible practices across the lifecycle of the goods and services they provide to, and on behalf of, Healthdirect Australia.

Environmental laws, permits and reporting

- Healthdirect Australia requires all suppliers to comply with all applicable environmental legislation, regulatory requirements, and permit conditions relevant to their operations, products, and services. Suppliers must maintain all necessary environmental approvals, ensure accurate and timely environmental reporting, and respond appropriately to regulatory notices. Compliance in this area is essential to reducing environmental harm and upholding Healthdirect Australia's broader commitment to environmental responsibility.
- Suppliers must, at a minimum, comply with all applicable environmental laws, standards and notices from regulators, and where appropriate international agreements relevant to their operations, products, and services. This includes, but is not limited to, the protection of biodiversity and ecosystems, the sustainable use of natural resources, and the mitigation of climate change, as legally required.
- Suppliers are encouraged to continuously improve their environmental performance and, where relevant, consider adopting environmental management systems (e.g. ISO 14001) as a framework to support this progression.
- Suppliers should obtain, maintain, and comply with necessary environmental permits, approvals, and registrations, in line with local legal requirements and best practice expectations.

Goods and services stewardship

- Healthdirect Australia encourages suppliers to demonstrate responsible stewardship over the goods and services they provide by adopting a whole-of-lifecycle approach. This includes proactively managing environmental impacts from sourcing through to end-of-life, in alignment with applicable laws, standards, and best practice sustainability principles.
- Suppliers are encouraged to embed sustainable design, resource efficiency, and waste minimisation into their operations, and to deliver products and services that contribute to Healthdirect Australia's broader commitment to environmental sustainability and responsible procurement.
- Suppliers should adopt a lifecycle perspective for their goods and services, actively seeking opportunities to minimise negative environmental impacts at each stage including design, sourcing, transportation, and end-of-life, with consideration for energy consumption, greenhouse gas emissions, water use, biodiversity impacts, and opportunities for reuse or recycling, within the bounds of legal and practical considerations.
- Suppliers should strive for circular design principles within their products and encourage the selection of inputs that support improved packaging, transport, and waste management outcomes.
- Suppliers must ensure that all electrical and electronic equipment provided to Healthdirect Australia complies with applicable regulations and is fit for its intended purpose.

Pollution prevention and resource efficiency

- Healthdirect Australia encourages suppliers to operate in an environmentally responsible manner by preventing pollution, managing hazardous substances, and promoting the efficient use of energy, water, and natural resources.
- Suppliers are asked to adopt systems and practices that minimise environmental harm, reduce emissions and waste, and support

the transition to low-impact, sustainable operations. This may include the responsible management of digital infrastructure and technologies such as data centres and AI-enabled solutions to mitigate growing energy consumption and environmental impacts.

- Suppliers should consider using resources efficiently and seek opportunities to reduce consumption of energy, water, and raw materials, within the bounds of applicable laws and operational requirements. This includes complying with environmental regulations designed to protect air, water, soil, and biodiversity, and supporting sustainable resource management practices.
- Suppliers should identify, monitor, and take reasonable steps to minimise and treat hazardous pollutants released to air, water, and soil. This includes management of wastewater (e.g. discharges and spills into storm drains) and the release of air emissions such as volatile organic compounds, ozone-depleting substances, particulates, and combustion by-products.
- Suppliers are encouraged to adopt practices that support waste minimisation, including material elimination, substitution, reuse, and recycling. All packaging supplied to Healthdirect Australia should, where practicable, be sustainably sourced, incorporate recycled content, and be designed for recyclability.
- Suppliers that operate data centres or develop software solutions, including those incorporating artificial intelligence (AI), are expected to monitor and manage the associated energy consumption, water usage and broader environmental impact. Healthdirect Australia encourages suppliers to implement policies or practices aimed at improving energy efficiency, minimising carbon emissions, blue and green water usage and ensuring the responsible and sustainable use of AI technologies.

Managing climate risk

- Healthdirect Australia encourages suppliers to assess, manage, and progressively reduce environmental and climate-related risks associated with their operations, goods, and

services. This includes understanding their environmental footprint, complying with applicable climate-related regulations, and supporting emissions reduction efforts across their value chains. Suppliers are also encouraged to provide transparent environmental data where available to support informed decision-making and continuous improvement.

- Suppliers should comply with applicable climate-related regulatory requirements, including the identification, measurement, and reporting of climate risks, where such obligations apply to their operations. This may include alignment with frameworks such as AASB S2 and the National Greenhouse and Energy Reporting (NGER) scheme, where relevant.
- Suppliers should seek to understand the environmental and climate related impacts associated with the goods and services they provide.
- Where feasible, suppliers are invited to provide data or documentation that helps assess the environmental impact of their offerings such as Life Cycle Assessments (LCAs), emissions factors, or Environmental Product Declarations (EPDs), to support Healthdirect Australia's sustainability goals.
- Suppliers are encouraged to offer products or service options that deliver reduced environmental impact, where possible.
- Suppliers should consider implementing policies or programs to support emissions reduction and improved environmental performance over time, including carbon emissions accounting aligned with recognised standards such as the Greenhouse Gas Protocol.
- Where relevant, suppliers are encouraged to consider the environmental performance of their own supply chain and to engage their suppliers in operating to a minimum set of environmental standards.

Privacy

As custodian of consumer personal information (including sensitive information), Healthdirect Australia complies with Commonwealth privacy laws (including the *Privacy Act 1988 (Cth)*) and for some services, State and/or Territory privacy laws (where appropriate). Healthdirect Australia also adopts careful and ethical data practices and embeds privacy considerations into the design of its services to appropriately manage privacy risks. In line with this, Healthdirect Australia requires *suppliers* to:

- apply adequate data privacy and security protection to protect the personal and sensitive information of our customers and employees from unauthorised access, use and disclosure.
- have adequate processes and procedures in place to monitor compliance with applicable privacy laws and contractual privacy obligations with Healthdirect Australia. This includes suppliers not doing anything which would cause Healthdirect Australia to be perceived as acting inconsistently with the [Healthdirect Australia Privacy Policy](#).
- respect the intellectual property rights of Healthdirect Australia and third parties. Any transfer of technology or know-how must be managed in a way that protects proprietary information and complies with applicable IP laws and contractual obligations.
- ensure their handling of personal information is fully aligned with the principles and obligations set out in Healthdirect Australia's [Privacy Policy](#) and broader [Privacy Commitment](#). Suppliers must uphold Healthdirect Australia's commitment to ethical data use, transparency, and the protection of consumer trust in all privacy-related matters.

Responsible use of Artificial Intelligence (AI)

Healthdirect Australia requires all suppliers who develop, implement, or integrate AI technologies into their goods or services to do so responsibly, ethically, and in accordance with Healthdirect Australia's principles of transparency, safety, fairness, accountability, and human oversight. Suppliers must ensure that AI tools used in their operations or delivered to Healthdirect Australia do not compromise the privacy, dignity, or safety

of individuals and are aligned with applicable laws and ethical standards. These expectations reflect Healthdirect Australia's commitment to trustworthy AI, as outlined in our [Artificial Intelligence Transparency Statement | healthdirect](#).

- Suppliers should assess and document the intended use, benefits, and limitations of any AI-enabled technologies or systems used in the delivery of goods or services to Healthdirect Australia.
- Suppliers should ensure human oversight, review mechanisms, and accountability structures are in place where AI is used to support or automate decision-making.
- Suppliers should ensure AI systems do not result in discriminatory or biased outcomes, and should take reasonable steps to mitigate such risks.
- Suppliers must ensure that any data used in AI systems complies with relevant privacy laws and ethical data handling practices.
- Suppliers are expected to promote transparency by being able to explain how AI systems function and make decisions, particularly where outputs may affect individuals or service delivery.
- Where relevant, suppliers should adhere to best practice frameworks to support responsible innovation, including the Australian Government's AI Ethics Principles, the NSW Government AI Assurance Framework, and Victoria's AI Ethics Policy.
- Suppliers are also encouraged to align with internationally recognised standards such as the Organisation for Economic Co-operation and Development (OECD) AI Principles, the UNESCO Recommendation on the Ethics of Artificial Intelligence, and the emerging regulatory standards under the EU Artificial Intelligence Act, where applicable.
- Suppliers must ensure that all data collected, stored, or processed on behalf of Healthdirect Australia is managed in accordance with Australian privacy laws and, where applicable, is hosted within Australia or in jurisdictions that uphold equivalent data protection standards.

Suppliers must not transfer Healthdirect Australia data offshore without prior written approval and appropriate safeguards in place.

Code compliance

Healthdirect Australia reserves the right to periodically assess or audit your practices that relate to compliance with this Code. In such event the supplier should co-operate by providing information, documents and access to staff, as Healthdirect Australia reasonably requires. Such reviews may include, without limitation, Supplier's trading locations (including head offices) and related Supplier information, including processes and policies, records, certifications, permits and other documentation which evidences the Suppliers' compliance with Healthdirect Australia's code. The Supplier is expected to fully co-operate with Healthdirect Australia in these

reviews and will promptly remedy any non-conformances identified during this inspection.

If a supplier becomes aware of a reasonable risk of a breach of this Code, the supplier must notify Healthdirect Australia as soon as practicable. Any identified deficiencies must be corrected on a timely basis as directed by Healthdirect Australia.

Where Healthdirect Australia has reasonable grounds to suspect a breach of this Code by a supplier, Healthdirect Australia may require the supplier to take additional steps which may include the provision of additional information or, in serious cases, submit to an independent audit at the supplier's premises at the supplier's cost. We take this Code seriously and any material non-compliance may result in the termination of the supplier's business relationship with Healthdirect Australia.



Glossary of terms

The following terms and definitions apply specifically to Healthdirect Australia.

Acronym/Key Term	Definition
<i>employees</i>	A full-time, part-time, maximum term, permanent or casual <i>employee</i> of Healthdirect Australia
<i>staff</i>	Healthdirect Australia <i>employees, contractors</i> who supplement Healthdirect Australia's internal workforce (including labour hire <i>contractors</i>) and persons performing voluntary work (including work experience)
<i>contractor(s)</i>	A person or entity that enters into a contract with Healthdirect Australia including for the provision of goods or services to or on behalf of Healthdirect Australia.
<i>supplier</i>	A <i>supplier</i> is a company, person, or organisation that provides goods, services, or materials to Healthdirect Australia.

How to contact us

For any enquiries regarding this Code or to discuss opportunities to work with Healthdirect, please contact the Commercial Team at commercial@healthdirect.org.au.





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