



CHU
SUPPLIER CODE
OF CONDUCT



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FOREWORD

At CHU, we understand that our success as a leader in strata insurance depends on more than just the products and services we provide.

It's about the values we uphold and the partnerships we build with those who share our commitment to doing what's right—for our customers, our communities, and the environment.

This *Supplier Code of Conduct* is an important step in strengthening the way we work with our suppliers. It outlines the ethical, sustainable, and socially responsible practices we believe are essential for a resilient and forward-thinking supply chain.

We see this Code as a practical guide to help us collaborate effectively. It sets clear expectations and promotes accountability between CHU and our suppliers. By embracing these principles, we can approach challenges with integrity and deliver meaningful outcomes that benefit not just our businesses, but the communities we serve.

In an ever-changing business landscape, our role goes beyond managing risks—we aim to create opportunities. Opportunities to innovate, to inspire trust, and to ensure that our operations leave a positive impact. By aligning with this Code, you, our suppliers, play a vital role in this journey.

Thank you for being an integral part of CHU's story. Together, we can continue to deliver with purpose, professionalism, and a shared vision for what's possible.

J Makin

James Makin

Chief Operating Officer, Chief Financial Officer
CHU Underwriting Agencies Pty Ltd



INTRODUCTION

CHU is committed to ethical, lawful, and fair business practices and expects suppliers to uphold these same high standards. This Code defines CHU's expectations for ethical, environmental, and social responsibility, ensuring responsible and sustainable partnerships.

While this Code defines the baseline standards applicable to all suppliers, certain suppliers may be required to meet more specific or rigorous requirements depending on the nature of their services or relationship with CHU. For such cases, this Code works in harmony with other CHU policies, such as the Procurement Policy, Third Party Risk Framework, and Outsourcing Policy, to ensure comprehensive governance and compliance.

If a supplier has concerns about conduct that does not meet these standards, they are encouraged to report through the designated channels outlined in this document.

Purpose:

The purpose of this Code is to establish the fundamental expectations CHU has for its suppliers regarding ethical, environmental, and social practices. By aligning with this Code, suppliers demonstrate their commitment to CHU's values and play a vital role in supporting a responsible and sustainable supply chain.

This Code complements—rather than replaces—contractual obligations and detailed policies that may apply to specific suppliers or partnerships. Together, these frameworks ensure that sustainability, ethical considerations, and operational

excellence are embedded into every aspect of CHU's supplier relationships.

We foster trust, transparency, and accountability to build partnerships that drive positive outcomes and support CHU's sustainability and governance goals.

In aligning with this Code, suppliers also commit to contributing to CHU's sustainability objectives,

including those outlined in our [Sustainability Charter](#). This Charter provides a clear roadmap for reducing environmental impact, fostering resilience, and achieving long-term sustainability across our operations. Suppliers are encouraged to actively collaborate with CHU in pursuing innovative and responsible practices that support these goals.

Defining a Supplier:

A supplier is broadly defined as any individual, organisation, or entity that provides goods, services, or support directly to CHU or on behalf of CHU in the delivery of its operations and commitments. This includes, but is not limited to, parties involved in our claims, underwriting, and distribution pipelines. This definition ensures all suppliers understand their role in upholding CHU's ethical, environmental, and social standards.

Examples of Suppliers:



Claims Pipeline:

- Trades and contractors involved in property repairs and rectifications.
- Loss assessors, adjusters, and other claims-handling professionals.
- Waste management and restoration service providers.



Underwriting Services Pipeline:

- Surveyors
- Data, actuarial, and analytics providers that assist in risk assessment and pricing.



Distribution Pipeline:

- Brokers, Intermediaries, and Authorised Representatives who distribute CHU products and services.
- Marketing agencies and consultants supporting product promotion and communication.

Why This Definition Matters:

This inclusive definition ensures that all external parties contributing to CHU's operations understand and adhere to the expectations outlined in this Code. To support them in meeting the expectations outlined in this Code, we are committed to fostering collaboration, providing guidance where needed, and promoting innovation to address shared sustainability goals. By clearly defining who is included, we aim to eliminate ambiguity and create a framework where all suppliers can actively contribute to CHU's long-term success and sustainability commitments.



ENVIRONMENTAL SUSTAINABILITY

With the impact of climate change evident in the world in which we live and work, CHU have a commitment to minimising our environmental impact and promoting sustainable practises in all aspects of our business.

We recognise the importance of protecting the environment for future generations and strive to make responsible decisions that support sustainability. CHU is committed to working with our supply chain to create lasting, positive change toward a more sustainable future.

We Expect commitment to:

- ✔ **Compliance with laws and standards** – Suppliers are expected to adhere to all applicable environmental laws, regulations, and standards.
- ✔ **Reducing environmental footprint** – Suppliers must minimise environmental impact across their operations and supply chain.
- ✔ **Truthful representation** – Suppliers must never falsify or exaggerate their environmental practices or credentials.

We Encourage actions to:

- ✔ **Set and measure targets** – Suppliers are encouraged to assess their environmental impact and establish measurable targets to reduce it.
- ✔ **Report progress** – Suppliers are encouraged to share updates on their efforts to minimise environmental impacts and their achievements toward sustainability goals.
- ✔ **Fostering partnerships** – Suppliers are encouraged to work together with CHU on efforts to lessen the environmental impact associated with the goods and services they provide.



SOCIAL SUSTAINABILITY

CHU is committed to promoting fair labour practises, ensuring the safety and well-being of workers and supporting the communities where we operate.

We expect our suppliers to adhere to values that support human rights and the well-being of all people. Through these efforts we aim to create a positive social impact while delivering quality products and services.

Supplier Expectations:

- ✔ **Respect for human rights** – Uphold the rights, welfare, and well-being of workers, supply chain partners, and customers.
- ✔ **Compliance with laws** – Adhere to all applicable laws and regulations related to human rights, modern slavery, employment, and health and safety.
- ✔ **Safe working conditions** – Create a secure and welcoming work environment that is free from discrimination, harassment, and bullying.
- ✔ **Addressing human rights issues** – Act promptly to resolve any identified infringements or adverse impacts on human rights.
- ✔ **Health and safety management** – Maintain documented policies and systems to monitor and address workplace health and safety.
- ✔ **Prevent exploitative practices** – Forbid all forms of human trafficking, slavery, forced labour, and child labour.
- ✔ **Legal employment standards** – Ensure all employees and contractors are legally entitled to work and can resign freely, per laws and agreements.
- ✔ **Fair compensation** – Provide wages that meet or exceed living standards, along with reasonable working conditions and hours.
- ✔ **Worker freedoms** – Allow employees the freedom to join unions or worker organisations and engage in negotiation activities.
- ✔ **Grievance mechanisms** – Offer accessible channels for workers to report concerns, supported by fair resolution processes and protective measures.
- ✔ **Preventing exploitation** – Implement systems to detect and address potential risks of sexual exploitation, human trafficking, or forced labour



SOCIAL SUSTAINABILITY

Human Rights and Workplace Practices

We are committed to ensuring our supply chains align with the International Bill of Human Rights, the International Labour Organisation’s (ILO) core conventions, and the UN Guiding Principles on Business and Human Rights.

Diversity and Inclusion

Expectations:

- ✔ **Fair treatment** – Treat all employees and job applicants equitably, ensuring equal opportunities and pay equality.
- ✔ **Inclusive culture** – Foster a workplace environment that respects and values diversity, promoting positive and respectful behaviour.

Diversity includes gender, race, age, disability, sexual orientation, religion, and parental status.

Community Impact

CHU has consistently prioritised community engagement, driven by the inherently community-oriented nature of the strata customers we serve.

Encouragements:

- ✔ **Positive contributions** – Suppliers should contribute positively to their communities while preventing harm.
- ✔ **Community initiatives** – Engage in activities that show a commitment to giving back to the community.



Charity Initiatives

Suppliers are encouraged to participate in or support charitable activities that align with CHU’s values and contribute to the well-being of the communities we serve. This may include sponsoring local events, donating to relevant causes, or providing volunteer support.

[MORE INFO](#)

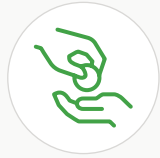


GOVERNANCE

CHU is committed to ethical leadership, complying with laws and regulations and the commitment to fostering a culture of trust, fairness and transparency.

We ensure our actions align with our values, while promoting fair and open competition. We expect our suppliers and their people to uphold these values and act responsibly when providing goods or services to CHU.

- ✔ **Act ethically and fairly** – Demonstrate honesty, integrity, and fairness in all dealings.
- ✔ **Provide accurate information** – Deliver reliable advice and information, supported by complete and thorough records.
- ✔ **Disclose conflicts of interest** – Notify CHU of any actual or potential conflicts of interest, whether at the organisational or personal level.
- ✔ **Maintain transparency** – Be open and clear in all business practices and communications.
- ✔ **Comply with legal obligations** – Adhere to all relevant laws, regulations, and contractual agreements.
- ✔ **Address misconduct** – Take appropriate action to manage and rectify poor conduct or misconduct within their organisation.
- ✘ **Encouragement of dishonest behaviour** – Avoid any incentives that promote unethical or dishonest practices.
- ✘ **Influence improperly** – Refrain from attempting to improperly influence CHU employees or representatives.
- ✘ **Engage in anti-competitive practices** – Avoid collusion, abuse of influence, or other actions that disadvantage other suppliers or restrict competition.



Bribery and Corruption

Suppliers must comply with all applicable anti-bribery and corruption laws. Specifically, they must:

- **Report excessive gifts or hospitality** – Gifts, entertainment, or hospitality must be reported to ensure transparency and compliance. Suppliers should establish clear policies defining acceptable gifts and hospitality and ensure all employees are aware of these guidelines.
- **Respect business processes** – Do not offer gifts or entertainment during competitive processes, such as tenders or bids. This ensures that all procurement activities are conducted fairly and without undue influence.
- **Avoid improper advantages** – Do not offer or accept bribes, kickbacks, or improper payments to gain unfair advantage.
- **Act impartially** – Must perform duties without favouritism, bias, or personal gain. Decisions should be based solely on merit and the best interests of all parties involved.

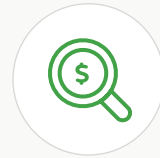


Anti-Money Laundering (AML)

Suppliers are expected to:

- **Be vigilant** – Remain alert to risks of money laundering and terrorist financing.
- **Comply with laws** – Follow all relevant AML/CTF laws and regulations.
- **Fulfill tax obligations** – Adhere to all applicable tax laws and disclosure requirements.

By following these governance standards, suppliers help foster a responsible and ethical partnership with CHU.



Insider Trading

- During your engagement with CHU, insider information may be accessible to you, defined as non-public information that, if disclosed, could materially affect the value or price of Steadfast securities or those of other organisations.

DO NOT:

- Share inside information.
- Use inside information to trade securities: Refrain from trading securities related to Steadfast, any capital provider of CHU, or any other entity based on non-public information.



Data Protection and Privacy

Suppliers must ensure the protection and confidentiality of all data by:

- **Complying with privacy laws** – Collect and share personal data only when required for legitimate business or legal purposes. Suppliers should be familiar with and adhere to regulations such as the Australian Privacy Principles and any other relevant data protection laws.
- **Securing personal data** – Safeguard personal information from unauthorised access, misuse, or disclosure.
- **Safeguarding confidential information** – Implement all necessary precautions to prevent the unauthorised access or disclosure of CHU's sensitive data.
- **Maintaining accurate records** – Suppliers must comply with privacy laws and protect confidential data from misuse or unauthorised access.

GLOSSARY

Anti Discrimination Act:

Legislation that prohibits discrimination on various grounds, ensuring equal opportunity. [More info](#)

Anti-Money Laundering and Counter-Terrorism Financing Rules:

Regulations designed to prevent the laundering of money and financing of terrorism. [More info](#)

Australian Privacy Principles:

A set of standards, rights, and obligations for handling, holding, accessing, and correcting personal information. [More info](#)

CHU Modern Slavery Statement:

A document outlining CHU's commitment and actions to prevent modern slavery within its operations and supply chains. [More info](#)

CHU Privacy Policy:

Guidelines on how CHU collects, uses, discloses, and manages personal information. [More info](#)

CHU Sexual Harassment Policy:

A policy detailing CHU's stance against sexual harassment and the procedures for addressing complaints. [More info](#)

CHU Sustainability Charter

CHU's sustainability charter sets out our commitment towards net zero and a more sustainable future.

[More info](#)

Environment Protection and Biodiversity Act:

Australian legislation for the protection of the environment and conservation of biodiversity.

[More info](#)

Modern Slavery Act:

Legislation aimed at combating modern slavery and human trafficking. [More info](#)

Whistleblower policies:

Procedures that protect individuals who report misconduct or unethical behavior within an organisation. [More info](#)

WHS Codes of practice:

Guidelines providing practical advice on how to achieve the standards of health, safety, and welfare required under Work Health and Safety laws. [More info](#)

Work Health and Safety:

Laws and regulations aimed at ensuring the health and safety of workers in the workplace. [More info](#)

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Date of Issue: 1 March 2025

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