



HUB24 Group

Supplier Code of Conduct

October 2026

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1. Our commitment

HUB24 is committed to doing business responsibly and maintaining resilient and reliable supplier relationships. We rely on suppliers to help deliver services, support clients, meet regulatory obligations and maintain operational resilience. We work with suppliers who act lawfully, ethically and professionally, and who help us protect our clients, our people, our information and our reputation.

This Supplier Code of Conduct explains the behaviour and business practices HUB24 expects from suppliers who provide goods or services to HUB24.



2. Who this Code applies to

This Code applies to suppliers, contractors, consultants, subcontractors and business partners that provide goods or services to, or act on behalf of, the HUB24 Group, regardless of geography. We expect suppliers to make their people, agents and subcontractors aware of these standards and to apply them across their own supply chains where relevant.



3. How this Code works

This Code supports HUB24's procurement supplier management and risk assurance activities. Suppliers may be asked to acknowledge the Code as part of onboarding, contracting or assurance activity. HUB24 may use the Code to guide supplier engagement, risk assessment, improvement planning and future contracting discussions. The Code does not amend, vary or replace contractual rights or obligations, and contractual terms prevail where they differ from the Code. For suppliers engaged under purchase orders or HUB24 terms and conditions where no separate written contract is in place, this Code applies to the extent consistent with those terms and any applicable law..



4. How we work with suppliers

We value supplier relationships built on integrity, accountability, transparency and practical collaboration. We expect suppliers to provide accurate information, manage risks effectively and raise issues early where they may affect HUB24 or the services provided to HUB24.



5. Act lawfully and responsibly

Suppliers must comply with all applicable laws, regulations and industry standards relevant to the goods or services they provide to HUB24.

This may include requirements relating to privacy, financial crime, anti-money laundering and counter-terrorism financing, employment, taxation, competition, work health and safety, and modern slavery.

Suppliers must also hold any licences, permits and insurances required by law or contract.



6. Conduct business ethically

Suppliers are expected to act fairly, honestly and ethically in all dealings with HUB24, clients, regulators, employees, subcontractors and other stakeholders.

Suppliers must not engage in bribery, corruption, fraud, unethical influence or improper benefits. Suppliers must identify, disclose and manage any actual, potential or perceived conflicts of interest. Gifts, hospitality or inducements must not be offered to gain an unfair advantage.



7. Respect people and human rights

Suppliers are expected to respect human rights and provide fair, safe and lawful working conditions.

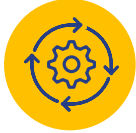
Suppliers must not engage in or support modern slavery, including child labour, forced or bonded labour, human trafficking or other modern slavery-like practices.

Suppliers are expected to ensure fair pay, reasonable working hours, safe working conditions and humane treatment. Suppliers must respect freedom of association and collective bargaining and disclose and address modern slavery risks in their supply chains.



8. Maintain safe and healthy workplaces

Suppliers must comply with relevant work health and safety laws and standards and are expected to provide safe and healthy work environments. Where required by law or contract, suppliers must promptly report and rectify incidents or breaches.



9. Protect information and manage operational risk

Suppliers must manage information security, privacy and operational risks in a manner proportionate to the goods or services they provide and the sensitivity or criticality of any information, systems or services involved.

Where suppliers handle, access, store, process, transmit or otherwise interact with HUB24 information, systems or services, suppliers must use HUB24 information only for authorised business purposes and maintain appropriate safeguards to protect confidentiality, integrity and availability.

Suppliers must maintain capabilities to detect, respond to and recover from information security incidents, data breaches, cyber events or service disruptions that may affect HUB24 information, systems or services. Where required, suppliers must promptly notify HUB24 of actual or reasonably suspected incidents and cooperate with investigation and remediation activities.

Suppliers must ensure that any subcontractors or third parties are subject to information security and privacy obligations appropriate for the services they provide.



10. Use artificial intelligence responsibly

Suppliers are expected to be transparent with HUB24 about material use of artificial intelligence or automated decision-making technologies in connection with services provided to HUB24, including where that use may involve HUB24 information or materially affect service delivery.

Where suppliers use artificial intelligence or automated decision-making technologies in connection with services provided to HUB24, suppliers must ensure that such use is lawful, ethical and does not compromise information security, privacy, confidentiality or intellectual property rights relating to HUB24 information and are expected to apply responsible AI practices.

HUB24 information must not be used to train artificial intelligence models unless HUB24 has expressly authorised this in writing.



11. Support environmental responsibility

Suppliers must comply with applicable environmental laws and are encouraged to promote sustainability practices.

Where requested by HUB24 and reasonably relevant to the goods or services supplied, suppliers should take steps to reduce the environmental impact of their operations and the goods and services provided to HUB24.

Where requested by HUB24 and reasonably relevant to the goods or services supplied, suppliers should provide environmental performance reporting to HUB24 and encourage other companies in their value chain to reduce environmental impacts.



12. Promote inclusion and supplier diversity

Suppliers should foster inclusive, respectful workplaces that promote diversity in employment and leadership, and prohibit discrimination and harassment.

HUB24 encourages engagement with suppliers from underrepresented groups, including First Nations owned businesses, women owned enterprises, social enterprises and disability inclusive businesses.

Suppliers are encouraged to support this commitment within their own operations and supply chains, including by considering opportunities to engage diverse suppliers where appropriate.



13. Monitoring and working through issues

HUB24 may monitor and assess supplier compliance with this Code through contractual, risk, audit or assurance activities, in accordance with applicable contractual rights and on a risk aligned basis.

Where reasonably required, suppliers should provide information or evidence to demonstrate alignment with this Code, to the extent reasonably available and subject to applicable confidentiality, privacy, legal privilege and contractual restrictions.

If concerns are identified, HUB24 may seek corrective action. Serious or unresolved issues may affect the continuation of the supplier relationship in accordance with contractual terms.



14. Raising concerns

Suppliers must promptly raise concerns or report incidents that may materially impact HUB24 through appropriate reporting channels, in accordance with applicable contractual, legal or regulatory requirements..

This includes actual or reasonably suspected conduct inconsistent with this Code, contractual breaches, data breaches, cybersecurity incidents, misuse of information, or matters that may pose legal, regulatory, ethical or reputational risk to HUB24.

For questions about this Code, or to raise concerns about conduct inconsistent with this Code, suppliers should contact Group Procurement in the first instance.

Matters involving potential breaches of law, regulation, ethical standards or material risk to HUB24 must be escalated in accordance with applicable contractual arrangements and HUB24's incident, breach and risk escalation processes.

Suppliers and other external stakeholders may also raise concerns under HUB24's Whistleblower Policy available on HUB24's website [[HUB24-Group-Whistleblower-Policy-2026.pdf](#)], where the matter involves misconduct or improper conduct.



15. Acknowledgement

Suppliers may be asked to acknowledge this Code as part of onboarding, contracting or assurance activity, where there is a material change to the supplier arrangement or where this Code is updated.

Failure to acknowledge this Code or engage with HUB24 regarding relevant concerns may result in corrective action, improvement planning or, where appropriate, impact the continuation of the supplier relationship in accordance with contractual terms.

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16. Publication and review

The current version of this Code will be published on HUB24's website and made available to suppliers for reference.

HUB24 may review and update this Code from time to time, including where there is a significant change to HUB24's strategy, operating environment, supplier risk profile, or relevant legal or regulatory obligations.

Suppliers should ensure they remain familiar with the latest version of this Code for reference.

