



Sustainable Supply Chain Management Framework

Policy owner

Group Procurement, Group Operations, Property &
Procurement

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1. Introduction

Westpac Group¹ has long been a leader in driving sustainable change. We want to create value for the long term - to be Number One, a profitable company, an employer of choice, a great Australian and New Zealand brand and a good corporate citizen. To achieve this, we need to be clear about our direct responsibilities and what we ask others to do on our behalf. That's why it's essential that we partner with suppliers, industry groups and customers to address the interconnected social, environmental and economic issues we all face.

2. Purpose of this Framework

Westpac has continually sought to ensure the way we work is sustainable. We also recognise that the actions of our suppliers are increasingly important factors in our sustainability performance and suppliers should be viewed as partners in our sustainability journey. Westpac was an early pioneer in Sustainable Supply Chain Management (SSCM) and we were quick to embed world leading sustainable sourcing practices aimed at ensuring our suppliers' business practices demonstrate high standards of sustainability.

Our resulting SSCM policy and process has been recognised as World's Best Practice for Banks – with recognition in the Dow Jones Sustainability Index from 2008 to the present. We have also been ranked amongst the world's most sustainable and ethical companies.²

Since its inception in 2004, our SSCM approach has guided our ongoing steps to build and demonstrate best practice in sustainable sourcing.

Over time, what is considered best practice has continued to develop. We've seen other financial organisations continue to improve their performance. Corporate supply chains are also coming under increasing customer, investor, media and stakeholder scrutiny. There is a need to continually improve our understanding and ability to manage risk and opportunity in our supply chain.

Continuing to refine and update our SSCM is crucial to a strong sustainable foundation at Westpac – enabling us to better manage risk, develop strategic partnership opportunities and strengthen trusted relationships with our suppliers.

This SSCM Framework represents the next evolution of our journey in sustainable sourcing, setting out our vision for SSCM to 2017. It builds upon our existing SSCM processes and discusses areas in which we could improve. We will continue to refine our ideas and how we might implement those ideas.

It also aligns our SSCM program more closely with the priorities set out in Westpac's 2017 *Sustainability Strategy*³ and supports our complementary commitments such as flexibility and diversity, accessibility, supporting indigenous Australians and initiatives such as backing social enterprise, Women's Markets and our employee action groups.

As we build on our existing practice, we are moving towards more strategic and transformational ways of engaging with our supply chain. This will lead to greater

¹ See <http://www.westpac.com.au/about-westpac/westpac-group/> for a full overview of Westpac Group's portfolio of financial services brands and businesses.

² See <http://www.westpac.com.au/about-westpac/sustainability-and-community/reporting-our-performance/ratings-and-awards/> for more information on Westpac's ratings and awards

³ See <http://www.westpac.com.au/about-westpac/sustainability-and-community/better-tomorrow/>

sustainable impact with benefits for both us, our suppliers, our customers and our communities.

What is sustainability?

Sustainability – in business terms - is about long term performance and our recognition that the long-term success of a company is contingent on stakeholder relationships and capacity to address areas of interest and concern. A sustainable company is one which employs good business practices, including product and risk management, the way a company treats employees, customers and location (the community and the environment), and the robustness of its governance practices. In investment terms we sometimes call sustainability issues environmental, social and governance practices, or ESG. Sustainability may also be referred to as corporate social responsibility (CSR) and sustainability reporting may be referred to as triple bottom line reporting.

We believe there are strong business – as well as ethical – reasons for focusing on sustainable business outcomes, including:

- Improved understanding of organisational strengths and weaknesses, leading to better risk management
- Improved credibility and trust in the market, protecting the organisation from reputational risk that could arise from engaging in inappropriate business, social or environmental practices
- Better relationships with suppliers, employees, customers and communities, leading to more closely targeted (and cost effective) solutions, products and services
- Improved workflow, product and material selection, resource and energy efficiency
- Competitive advantage due to improved ability to sustain long-term contracts
- Ability to explore new market segments and satisfy market niches for sustainable products and services.

Westpac's 2017 Sustainability Strategy

For our business to prosper, so too must the communities in which we operate. Our 2017 *Sustainability Strategy* is focused on three priority areas designed to achieve more sustainable outcomes across our operating environment:

1. **Embracing Societal Change:** Help improve the way people work and live, as our society changes, by thinking creatively about shifting demographics, tapping into traditionally underemployed groups and evolving service offerings.
2. **Environmental Solutions:** Help find solutions to environmental challenges by providing products and services, lending to and investing in CleanTech and environmental services, and reducing our environmental footprint.
3. **Better Financial Futures:** Help customers have a better relationship with money, by exploring new paths of personal wealth creation that are less dependent on debt and offer new models of financial education to meet the changing concept of retirement.

We see SSCM as being one avenue for us to achieve impact in these three areas.

3. Our commitment

We commit to proactively seeking to better understand and manage risk and opportunity in our supply chain, by:

- Establishing our expected standards of ethical, social and environmental business practices required for suppliers through Westpac's SSCM Code of Conduct and ensuring that these standards are relevant to the social, ethical and environmental issues and risks relevant to our suppliers' operations, products and services
- Ensuring that the SSCM Code of Conduct is appropriately implemented, through SSCM assessments, action plans and contractual clauses

- Working collaboratively with suppliers to positively influence social, ethical and environmental performance in line with the Code of Conduct. Specifically, we seek to ensure management systems are in place to address any issues, risks and opportunities and that these systems are delivering effective performance management and improvement
- Taking action on suppliers where practices remain unacceptable or performance remains unsatisfactory
- Engaging with suppliers who demonstrate commitment to best practice, continuous improvement, and collaborative multi-supplier approaches, with sustainability performance being one aspect of how we choose to further develop partnerships.

These supply chain commitments are also referenced in our Principles for Doing Business.⁴

4. Our approach

Westpac is internationally recognised as a leader in sustainability; however there is still opportunity to develop strategic and transformational ways of engaging our supply chain. Our approach is summarized in the following diagram, and discussed in this Framework.

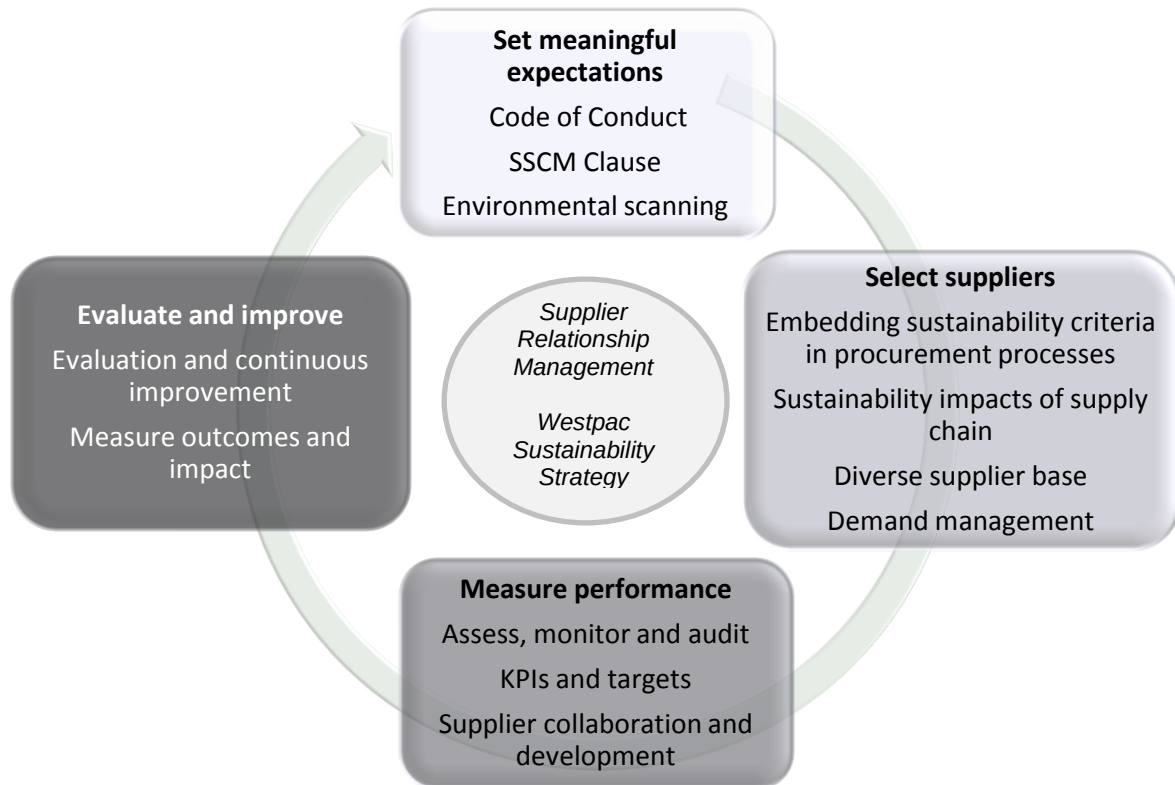
This Framework builds on the discipline we have developed since the early 2000s – when we introduced SSCM questionnaires, a Code of Conduct and a validation program. The Framework looks to complement this approach with a particular focus on developing partnerships with suppliers and other stakeholders. We want to encourage greater buy-in and ownership by our own staff and suppliers of how sustainability is relevant in business and operations – thereby nurturing a shared agenda. We believe this will enable us to more effectively tackle risks and opportunities together.

In addition, our goal is for the SSCM program to have a more extensive reach across the Westpac Group, engaging multiple group business units and a greater number of suppliers in sustainability discussions. This includes suppliers to Westpac Group, namely BankSA, St.George, BT Financial Group, RAMS and Bank of Melbourne.

At present, due to the smaller number of suppliers and independent supplier relationships in New Zealand and Pacific Islands businesses, certain exceptions are made to the application of our SSCM processes. However we will be looking at ways of adopting SSCM across the greater Westpac Group.

⁴ See <http://www.westpac.com.au/about-westpac/sustainability-and-community/better-tomorrow/our-approach/principles-for-doing-business/>

Westpac's approach to SSCM⁵



5. Set Meaningful Expectations

a. Update and implement our SSCM Code of Conduct

We seek to create meaningful expectations of our suppliers through publicly available information on SSCM. Our SSCM Code of Conduct (Code) sets out Westpac's expectations of suppliers. We updated the Code in 2014. This draws on overarching principles of the United Nations Global Compact (to which Westpac is a signatory), Global Reporting Initiative (GRI), Dow Jones Sustainability Index, subject matter experts, non-government organisations (NGOs), suppliers and literature on best practice.

The Code encompasses a number of social, economic and environmental topics. These cover public reporting, labour/workplace management, Occupational Health and Safety (OHS), risk management, environment, carbon, corporate governance and ethics, supply chain, community, accessibility and indigenous inclusion.

The expectations in the Code range from basic legal compliance to what we consider best practice. It includes 'required actions' that we consider important to address before we enter into a contractual relationship with a supplier, or within the first year of the contract. It also includes 'preferred actions' which are not mandated, but which we strongly encourage our suppliers to adopt as good and best practice over the course of the contract.

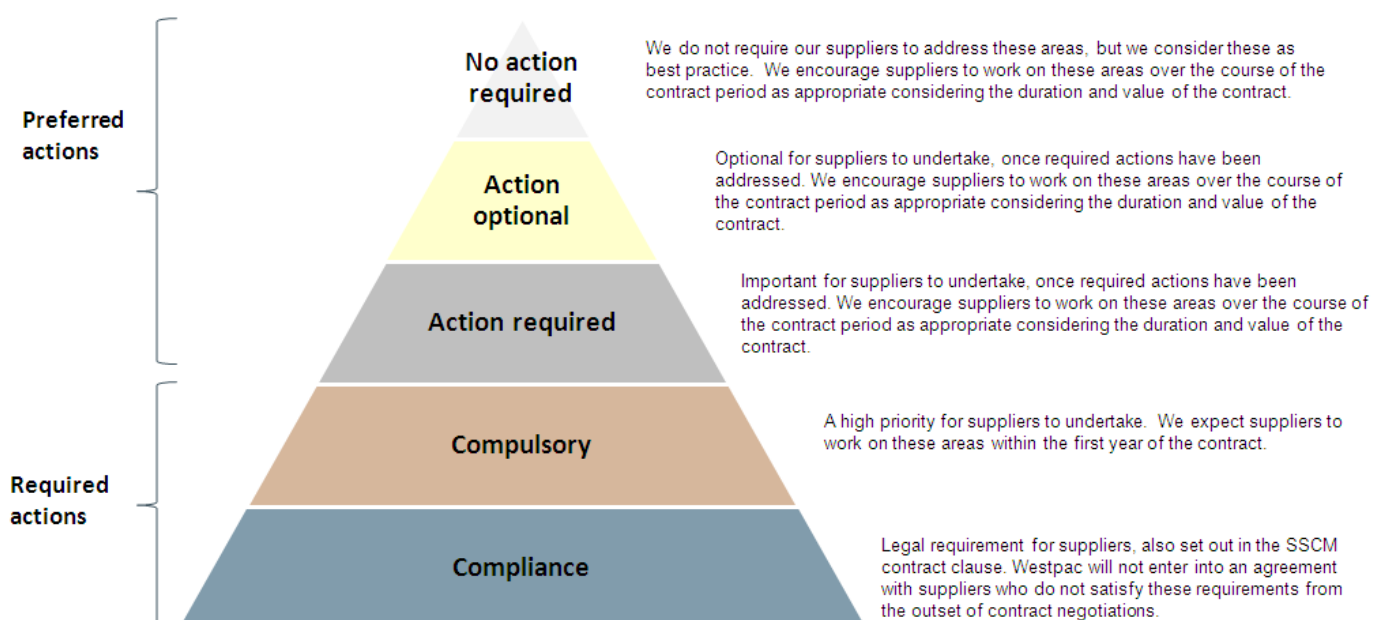
⁵ Adapted from Brammer, S; Hoejmose, S and Millington, A. 2011. Managing sustainable global supply chains: A Systematic Review of the Body of Knowledge. Network for Business Sustainability. Available at: <http://nbs.net/topic/supply-chain/global-supply-chains/>

We think of the Code as a roadmap that helps us to identify the extent of our suppliers' sustainable business practices. Using this helps us to work with our suppliers to make progressive improvements that are appropriate for their business. The Code provides a basis for how we plan to work with suppliers who make genuine efforts to improve their performance over time.

It is important to recognise that the Code is a living document. We will be piloting its application and seeking feedback as we roll out our online tool with suppliers. Over time we need to ensure its continuing relevance and currency. For example, as best practice becomes the normal expected standard, our expectations of suppliers are likely to similarly evolve. We also encourage our suppliers to influence their own supply chains in a similar manner.

The Code is implemented through contractual clauses and an SSCM assessment, using an online tool. This tool tailors our Code requirements to our suppliers based on their characteristics. This helps to ensure that questions are mapped to the level of a supplier's specific sustainability risk.

Westpac's Code of Conduct: Action priority



b. Enhance our Environmental Scanning

We will enhance our ability to anticipate new challenges and issues in the context of international supply chains through scanning of the environment – drawing upon expert assessments, geographical and industry risk analysis in areas of relevance to the business. For example, one study found that a focus on areas including technology hardware and equipment, software, telecommunication services, professional services and transportation could yield emissions reductions and financial benefits in banking supply chains.⁶

⁶ Accenture and CDP. 2014. Supply Chain hot spot analysis. Available at: <https://www.cdp.net/en-us/pages/cdp-supply-chain-broadcast-2014.aspx>

Our refreshed Code is one outcome from our environmental scanning. However we recognise that we will need to review our Code at regular intervals to ensure it is fit for purpose, reflects best practice and is relevant for our suppliers. We will consider opportunities to work with academics, NGOs, our suppliers and other stakeholders to help us to gain improved visibility of emerging issues and address them appropriately.

6. Select Suppliers

With a large number of suppliers, Westpac recognises the need to prioritise our efforts. This increases the efficiency and effectiveness of the SSCM process.

We prioritise our efforts:

- Through a risk assessment, which covers social, ethical, economic and environmental criteria
- Through the level of group wide spend - our top 80 suppliers represent 68% (FY13) of our supply chain spend, although they make up 0.2% of Westpac's 39,875 suppliers (FY13). Our SSCM Assessment process focuses on 98% of our top 80 suppliers, as at FY 2013⁷
- By identifying major and material suppliers
- By identifying offshore providers.

Our SSCM assessment process currently focuses on these top 80 suppliers, shown in the table below.

Self-assessment of top suppliers against SSCM¹

	2013	2012	2011	2010	2009	
	%	%	%	%	St.George	Westpac
					%	%
Top suppliers self-assessed	98	94	92	86	70	94
Associated spend self-assessed	100	99	99	98	91	99
All self assessed suppliers as % of total	73	76	75	69	28	68

¹ Top suppliers defined as: top 100 (Westpac) 2009 and top 50 (SGB) 2009, top 150 in 2010–2012; top 80 in 2013.

Source: Westpac Supplier Factpac⁸

We will also consider the following actions in our initial sourcing and supplier selection processes.

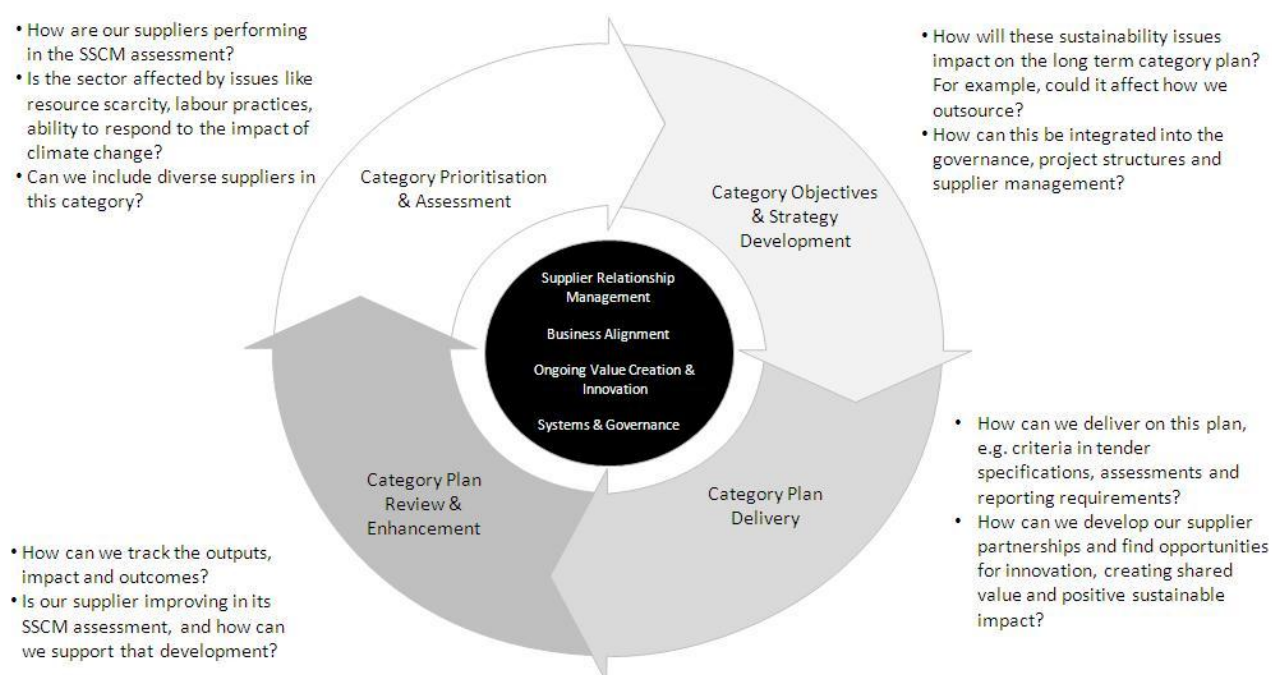
a. Integration of sustainability criteria into procurement processes

We will consider how to integrate sustainability considerations more systematically and meaningfully into our procurement process. The requirement to comply with our SSCM process is already included in standard contracts and tender documentation. We are also working to ensure that this Framework is implemented effectively into our category management. An example of the considerations that could be considered at each stage is shown below. This involves a systematic approach to internal review and external market analysis; developing strategic category plans; deployment of those plans, and tracking and reporting results. A strategic approach to managing supplier relationships is a consideration at each stage of this process, and is a key enabler for creating mutual value. This will help to make SSCM a part of the way we do business on a day-to-day basis.

⁷ As reported in the audited supplier factpac. See <http://www.westpac.com.au/about-westpac/sustainability-and-community/reporting-our-performance/stakeholder-impact-reports/>

⁸ As reported in the audited supplier factpac. See <http://www.westpac.com.au/about-westpac/sustainability-and-community/reporting-our-performance/stakeholder-impact-reports/>

Westpac's Category Management process: potential ways to integrate sustainability criteria



We may also consider the development of guidelines for sourcing procurement in particular categories similar to our existing *Paper Purchasing Policy* and *Tool of Trade Vehicle Policy*.

b. Better understanding sustainability impacts of our supply chain

We can map our supply chain by tracing the key activities of organisations and people involved in bringing a product or service from raw material to market. This can help us gain a better understanding of the extent to which our supply chain impacts on our environmental and social footprint. This may help us to identify the most significant environmental and social challenges that we and our suppliers face, and prioritise our efforts accordingly.

c. Develop a more diverse supplier base and encourage suppliers to value diversity

Whilst our SSCM Assessment is predominantly focused on our largest, high risk and high spend suppliers, we are also keen to support and invest in increasing opportunities for minority owned groups and enterprises looking to lift social inclusion to supply us with goods and services. We also see opportunities to better align our values and purpose with our suppliers' – through social procurement spend as well as shared giving and collaboration.

We also encourage our suppliers to value diversity within their own operations. Westpac's own focus on workforce diversity and flexibility includes age diversity and the participation of youth and employees aged 50+, people with disability; indigenous Australians; gender equity and LGBTI inclusion; all supported by workplace flexibility.

This links directly to our 2017 *Sustainability Strategy* and in particular our priority to respond to shifts of demographic and cultural change by tapping into groups addressing social inclusion and supporting groups that have lower unemployment levels than the Australian norm. It also leverages Westpac's work in accessibility, diversity, Women's Markets,

indigenous business and reconciliation, and creating strong social enterprises through the Westpac Foundation.

We see this as offering us many potential benefits, including:

- Better understanding, supporting and reflecting our diverse customer base and the business community we operate within
- Helping us to access and grow new markets, new customers, and new talent in diverse communities
- Contributing to a more resilient supply chain, economic wellbeing, employment, financial inclusion and innovation in the communities in which we live and work.

Westpac already engages with a number of diverse suppliers. We also see value in working with organisations such as Supply Nation, the Westpac Foundation, Ruby Connection and Social Traders to build the capacity of our diverse customers and suppliers.

We recognise that further measures can be undertaken to embed and encourage supplier diversity in Westpac's supply chain. These could include the following:

- **Building capacity amongst diverse suppliers:** We recognise that initially some diverse suppliers may require additional support and capacity building such that they are better able to meet our selection criteria and to build competitiveness in the longer term.
- **Opportunities in our suppliers' supply chains:** We can identify second and third tier opportunities with our partners and suppliers. We have already set targets around this, including the establishment of an Indigenous Apprenticeship Program (see below).
- **Embedding supplier diversity in the way we source:** We can consider how to include diversity criteria in our sourcing processes. For example, we can incorporate diversity considerations in initial identification of a need for goods and services and the tender and selection process (considering the demographic make-up of suppliers as well as their own commitment to employee diversity).
- **Setting targets around diversity and social procurement spend.** We have set targets around spend with indigenous suppliers. We will also aim to set overall targets for diversity and social procurement engagement and spend, and consider how these can be appropriately embedded in our procurement practices.

Promoting mutually beneficial diversity, inclusion and work flexibility

Community demographics and expectations about work are changing. We are also facing an accelerating pace of change, disruptive technologies, slowing labour market growth and an ageing population. At Westpac we are adapting by making workplace flexibility a reality. This means thinking differently about how, when and where work is conducted. We see this as an opportunity to help ensure the sustainability of our workforce and our business.

This means actively responding to our community context and transforming our workplaces to benefit both our staff and our business. We are using technology in new ways and offering a greater choice of employment arrangements for a broader range of diverse communities.

We're working with our suppliers to lift levels of flexibility and inclusion in our workplaces. Together we hope to make work flexibility the norm – a key element if we are to achieve high levels of employment participation across Australia.

Indigenous Apprenticeships

Our procurement team are partnering with our Conference & Catering provider, Restaurant Associates (Compass Group), to provide apprenticeship opportunities in the areas of Hospitality, Reception & Administration and Event Management. This aims to provide apprentices with 360 degree support through mentoring, training and continuous support via an alumni network after graduation.

Ruby Connection

We are the only Australian bank with a Women's Markets team exclusively dedicated to supporting women, through Ruby Connection. We were also the first Australian corporate member of WeConnect, a not-for-profit connecting women owned businesses with corporate buyers. We will be looking to WeConnect's international network of certified women owned businesses as we develop our engagement of diverse suppliers.

Demand management

We recognise the benefits of better understanding our demand for products and services and planning our requirements accordingly. We have an active demand management program in place for strategic categories of spend. By looking at ways of better managing our internal usage and external purchase of goods and services, we can achieve outcomes that are both sustainable and commercially beneficial. For example, optimising our courier runs between branches could help us to increase efficiency and reduce associated transport emissions.

7. Measure and improve performance

We measure the performance of our supply chain through assessment, monitoring and auditing of our suppliers. These activities are essential for understanding risks and challenges in our supply chain.

Complementing this is our work with peers and suppliers to remove barriers to implementing sustainability throughout the marketplace. We do this by sharing information, highlighting best practice among our suppliers, and assisting our suppliers to make changes for the better. By working with industry and sharing information, we believe we can collectively improve our mutual sustainability performance. In 2012 for example, we published Supplier Case Studies⁹ to demonstrate the benefits of SSCM.

a. Assessment

To date, Westpac has used several tools for assessing the performance of our suppliers across a range of economic, ethical, social and environmental business practices. These include a Risk Assessment Tool, SSCM Code of Conduct Toolkit and SSCM Questionnaire.

A new SSCM online assessment process will be gradually phased in over time with our suppliers. This is a major step forward in our ability to ensure that our expectations – set out in our Code – are appropriately tailored to the circumstances of our suppliers and their specific sustainability risks.

A key focus of the questions is whether suppliers have written policies and management systems to give life to those policies, and measurement and validation systems to prove the strategies being employed are working. We are also keen to understand if suppliers externally report on their performance, and any targets for improving performance.

⁹ See <http://www.westpac.com.au/about-westpac/sustainability-and-community/sustainability-action/suppliers/>

b. Monitoring

We view the SSCM process as an ongoing, long-term commitment to continuous improvement in the quality of sustainable business practices of Westpac's suppliers. To address every issue may not be appropriate for all suppliers, and could be costly – therefore we prefer consistent application of improvement strategies that are appropriate and reasonable given the value and duration of the contract.

We do this through implementing Action Plans that are tailored for each supplier's particular circumstances and based on priorities outlined in the Code. The table below shows our progress in developing Action Plans with some of our high risk, high spend suppliers. As the term 'sustainability' is used by Westpac in a broad sense, the agreement reached may cover a diverse set of issues.

Sustainability action plans¹

	2013	2012	2011	2010	2009
Number completed	39	32	12	19	9
Number agreed to and in progress	63	94	59	42	54
Number pending	11	7	34	11	4

¹ Does not include actions for WNZL suppliers. The upward trend is attributable to an active monitoring program implemented at the end of 2010.

Source: Westpac Supplier Factpac¹⁰

c. Auditing and verification

The assessments that suppliers complete are self-reporting mechanisms. There are a number of ways that Westpac works with suppliers to help ensure the integrity of responses:

- As part of our SSCM contractual arrangements, Westpac asks suppliers to warrant that responses to the assessments are true and accurate. Evidence of responses may be requested, and suppliers agree to undertake improvement actions according to an agreed timeframe
- Offshore providers are subject to regular onsite checks as well as desktop audits
- External validations are completed annually, involving an independent consultant which includes at least one offshore validation
- Westpac reviews progress on Action Plans on a quarterly basis with suppliers to improve sustainability performance. Evidence of responses may be requested to if suppliers warrant that actions have been completed
- Sourcing managers regularly monitor supplier performance against the contract, including compliance against our SSCM process.

Supplier validations – validations to ensure the integrity of Westpac Group's SSCM Policy

	2013	2012	2011	2010	2009
Westpac validation including onshore and offshore vendors (number completed)	89	59	25	24	34
External validation (cumulative % of top suppliers including onshore and offshore vendors) ¹	11%	8%	10%	7%	5%

¹ Cumulative percentage of validations of top suppliers (validations expire after 3 years)

Source: Westpac Supplier Factpac¹¹

¹⁰ As reported in the audited supplier factpac. See <http://www.westpac.com.au/about-westpac/sustainability-and-community/reporting-our-performance/stakeholder-impact-reports/>

¹¹ As reported in the audited supplier factpac. See <http://www.westpac.com.au/about-westpac/sustainability-and-community/reporting-our-performance/stakeholder-impact-reports/>

d. Developing key performance indicators (KPIs) and targets

As already mentioned, we have existing targets around spend with indigenous suppliers and we will consider other ways to encourage and measure engagement with other diverse suppliers. We already have a high level (98%) of our top suppliers as self-assessed, and we aim for this to be at least maintained, if not bettered. We aim for all our top suppliers to transition to SSCM Online before the end of 2015.

We will be developing up a set of KPIs and targets by which we will measure our progress against each element in this Framework. In future, we will also consider how we can integrate their use with specific suppliers.

e. Supplier partnership and development

There are many benefits that could be realised from working collaboratively with key suppliers on sustainability issues. These benefits may include:

- Greater trust and ability to learn and share best practices through information sharing and transparency
- Ability to find areas of mutual interest and value, for example to help address our *Sustainability Strategy* priorities of embracing societal change, finding solutions to environmental challenges; and improving our customers' relationship with money
- Stronger integration and acceptance of SSCM into our 'business as usual' sourcing work
- Better understanding of the different challenges our suppliers are facing.

We will consider ways of working towards this goal, including:

- Identifying areas across the bank beyond sourcing where supplier partnerships could be mutually beneficial
- Providing a governance process for coordinating requests made by and of our suppliers, to ensure that these are strategically aligned with areas of mutual interest, such as meeting our overall sustainability objectives
- Supplier development training to develop knowledge and awareness
- Supplier recognition and reward programs that promote best practice.

8. Evaluate and improve

We recognise the importance of developing our organisational capacity to learn on a continuing basis from our experiences in managing a sustainable international supply chain.

An important aspect is our own external transparency and accountability. By providing a forum for feedback from our stakeholders, we are able to communicate the continual improvement and evolution of our SSCM process. Current activities include;

- Annual Sustainability Reporting in accordance with the Global Reporting Initiative (GRI)
- Independent assurance of our Sustainability Report against the AA1000 Assurance Standard.¹²

We complement these frameworks with additional, specific indicators to ensure we capture the most material issues for our stakeholders. Future activities are being considered as a

¹² See <http://www.westpac.com.au/about-westpac/sustainability-and-community/reporting-our-performance/>

way to improve our ability to evaluate, measure our progress and improve. This could include:

- Reporting supply chain compliance data, along with case studies of best practice and performance improvement to demonstrate the benefits of SSCM, such as resource efficiencies and increased productivity. In 2012, we made a start by publishing a number of Supplier Case Studies, showing how our SSCM process helped to trigger better management of social, ethical and environmental aspects of their businesses.
- Utilising data that will be available through SSCM Online to develop insights into how we can improve the performance of our processes
- Developing ways to better capture and communicate the outcomes and impact of SSCM
- Continuing engagement with internal and external stakeholders as a forum for feedback and improvement, for example, hosting cross-industry problem-sharing workshops.

9. Roles & Governance

We recognise the importance of ensuring we have the right internal roles and responsibilities to ensure commitment, oversight and support for the Framework. A supportive organisational culture is also imperative to effectively implementing this Framework.

Westpac's Sustainability Council provides leadership and oversight of this Framework. The Council is comprised of leaders from across the Westpac Group responsible for managing our sustainability agenda and performance. Other sustainability and procurement forums provide frequent oversight and monitoring.

We also seek to ensure that we:

- Integrate SSCM into relevant business and sustainability strategies
- Assign roles and responsibilities for integrating sustainability into our sourcing processes
- Provide appropriate training and employee engagement for staff involved in SSCM.

10. Contact us

We welcome your views and suggestions. Email us at sscm@westpac.com.au.

For more information on our activities see our website: <https://www.westpac.com.au/about-westpac/sustainability-and-community/sustainability-action/suppliers/>

11. Version control

VERSION	CONDUCTED BY	APPROVAL	DATE	CHANGES
1	Elaine Yong, Group Procurement		August 2014	Initial Framework