



Supplier Code of Conduct

June 2025



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1. Purpose

The purpose of this Supplier Code of Conduct (**Code**) is to communicate Titles Queensland's expectations in relation to the behaviour and business practices of our suppliers. Titles Queensland's procurement decisions are guided by the supplier's ability to meet and/or exceed the requirements of this Code.

2. Our Values

At Titles Queensland, our core values guide our actions, conduct, and decision-making. Titles Queensland expects our suppliers to share and uphold these values in every aspect of our partnership, being:

- (a) **One** – To support and empower each other, with a culture that welcomes an inclusive environment where we can all belong and thrive;
- (b) **Respect** – To demonstrate compassion and empathy in our dealings, and value the contributions of others;
- (c) **Integrity** – To carefully manage the accuracy and integrity of the register, and build credibility and trust with each other, our customers, and stakeholders;
- (d) **Pride** – To take pride in our history, knowledge, expertise, and contributions to our communities, while focussing on our future opportunities; and
- (e) **Excellence** – To strive for excellence to deliver a seamless service and support an innovative culture that inspires our people.

3. General

The supplier acknowledges that:

- (a) in addition to any specific items mentioned elsewhere in this Code, it will comply with all relevant legislation and standards; and
- (b) it will promptly report any breach of this Code in writing, to the Titles Queensland Contact nominated in the relevant Request for Quote, Request for Proposal, or an applicable contract.

4. Safety and wellbeing

Titles Queensland is committed to ensuring the safety and wellbeing of its staff and suppliers through effective work, health, and safety management practices.

Titles Queensland requires its suppliers to:

- (a) comply with all laws and regulations related to work, health, and safety and other relevant and applicable safety laws;
- (b) provide a safe working environment through the implementation of controls proportionate to the engagement in question, level of risk, and provision of appropriate training and supervision;

- (c) promote and commit to workplaces free from discrimination, victimisation, bullying, vilification, harassment, abuse, or inhumane treatment, while fostering workplaces where others are treated fairly, and with respect and dignity;
- (d) take care of their own health and safety, and the health and safety of others who may be affected by the supplier's actions;
- (e) consult and cooperate with Titles Queensland in relation to its health, safety and wellbeing procedures, instructions, and directions; and
- (f) report any safety incidents related to Titles Queensland's activities in a prompt and timely manner.

5. Labour Practices and Human Rights

Titles Queensland works with suppliers that share Titles Queensland's commitment to supporting the welfare of employees and the wider community.

Titles Queensland requires its suppliers to:

- (a) respect all worker's workplace rights and entitlements and ensure compliance with all relevant workplace laws, regulations and instruments, including with respect to fair pay and working conditions;
- (b) recognise freedom of association and the right of workers to be members of trade unions and to collectively bargain;
- (c) take reasonable steps to ensure that any risk within its operations and supply chains in relation to Modern Slavery (as defined in the *Modern Slavery Act 2018* (Cth)), is identified, assessed, addressed, and mitigated; and
- (d) be familiar with Titles Queensland's Whistleblower Policy (available on our website [here](#)), and to disclose any Reportable Conduct as defined in, and made in compliance with, the Whistleblower Policy.

6. Diversity and Inclusion

Titles Queensland is committed to creating an inclusive workplace culture by promoting inclusive practices and integrating diversity, equity and inclusion initiatives into the way the business operates.

Titles Queensland requires its suppliers to:

- (a) make efforts to establish a culture where differences amongst people are respected and valued;
- (b) behave in a fair and equitable way and not discriminate including in the areas of gender, sexual preference, age, culture, disability, or lifestyle choice; and
- (c) promote the principles of diversity, equity, and inclusion in their operations by implementing practices that anticipate and accommodate the needs of a diversity of people.

7. Privacy and Information and Cyber Security

Titles Queensland manages the land and water titles registries for the State of Queensland with a core purpose of maintaining the reliability and integrity of the registers, protecting peoples most valuable assets. It is therefore critical for Titles Queensland to meet its privacy obligations under the *Information Privacy Act 2009* (Qld) (**IPA**), and to mitigate information and cyber security risks.

Titles Queensland requires its suppliers to:

- (a) comply with privacy obligations applicable to Titles Queensland, including under the IPA;
- (b) maintain appropriate procedures and practices for identifying, managing, and mitigating information security and cyber risks based on the principles of the Australian Cyber Security Centre standards and recommendations;
- (c) notify Titles Queensland promptly of any privacy or security breach or threat that may impact Titles Queensland, and cooperate with any investigation, mitigative, or corrective actions including by providing any information, documents, and access as Titles Queensland may reasonably require;
- (d) not do anything that would in any way compromise the security of Titles Queensland's systems, networks, data or resources; and
- (e) not do anything that would cause Titles Queensland to contravene or be seen to contravene, its Privacy Policy (available on our website [here](#)) or its obligations under the IPA.

8. Governance and Compliance

At Titles Queensland, governance, ethics, and responsible business practices are of utmost importance.

Titles Queensland requires its suppliers to:

- (a) adopt a system of appropriate management and governance practices to ensure compliance with all laws, regulations, standards, and contractual arrangements applicable to the goods and services that the supplier provides;
- (b) implement measures to prevent fraud, corruption, and bribery, and immediately report such instances (including suspected instances) to Titles Queensland;
- (c) not offer any entertainment, gifts, or benefits to Titles Queensland or receive any entertainment, gifts or benefits that could inappropriately influence, or be perceived to inappropriately influence, the outcome of business transactions;
- (d) act in a fair, reasonable, and ethical manner with all stakeholders;
- (e) implement measures to identify and manage conflicts of interest, and promptly disclose any conflicts of interest to Titles Queensland in the form required by Titles Queensland; and
- (f) notify Titles Queensland promptly of any compliance related issues.

9. Environmental Sustainability

Titles Queensland strives for long term growth of its business, returns, and performance, while at the same time, protecting and enhancing the environment, the wellbeing of its people, and the community in which we operate.

Titles Queensland requires its suppliers to:

- (a) comply with relevant laws and regulations relating to the environment;
- (b) commit to delivering efficient operations by reducing the use of natural resources, minimising waste, and incorporating environmentally friendly business practices whenever possible;
- (c) minimise carbon footprint associated with energy and fuel use, reduce consumption of resources and their associated carbon, or identifying lower carbon alternatives; and
- (d) promote a culture that values the environment and acts to protect the environment in which they operate.

10. Implications of not complying with this Code

Titles Queensland reserves the right to do business with suppliers who comply with this Code. Titles Queensland may elect to not work with or cease to work with suppliers who do not comply with this Code.

Without limiting Titles Queensland's rights under an applicable contract, Titles Queensland may take one or more of the following actions if a supplier breaches this Code:

- (a) investigate breaches of the Code;
- (b) a requirement to implement remedial action to rectify breaches of the Code;
- (c) termination of contracts (subject to the terms of the contract); or
- (d) referral of matters for civil remedy or criminal investigation.

11. Reporting suspected breaches of the Code

Suppliers should contact the Titles Queensland Contact nominated in the relevant Request for Quote, Request for Proposal or an applicable contract, if they have any concerns or would like to report a suspected or actual breach of this Code.

Alternatively, any concerns regarding:

- (a) unethical or improper activities can be reported to Titles Queensland in accordance with Titles Queensland's Whistleblower Policy; and
- (b) illegal activity or corruption should be immediately referred to either the Queensland Police Service, the Australian Federal Police or the Crime and Corruption Commission.