

PURPOSE AND SCOPE

The Supplier Code of Conduct establishes an ethical, social, environmental, and operational framework for our suppliers. This framework is to ensure alignment with our company's values, governance—and commitment to responsible and sustainable business practices. By adhering to this Code of Conduct, suppliers contribute to an integrity-driven supply chain that upholds human rights, safeguards the environment, and maintains high-quality products and services. ASCC continues to strive towards aligning its practices with Corporate Social Responsibility (CSR). This Code should not be read in lieu of, but in addition to any supplier obligations and/or agreements between ASCC and the supplier.

The scope of the Supplier Code of Conduct encompasses all suppliers, vendors, subcontractors, and partners who provide goods, services, or materials to our company. This Code applies to all stages of the supplier relationship, from initial engagement to ongoing collaboration. It is applicable across all geographical regions, ensuring a consistent standard of ethical and responsible conduct, regardless of location. ASCC recognises that for some suppliers, vendors, or subcontractors the ability to fully comply with the measures listed below is not feasible. For these companies, 'where applicable' should be noted and applied.

ROLES AND RESPONSIBILITIES

The Chief Executive Officer and ANZ Supply Chain Manager are responsible for the review of the Code and mediating supplier complaints or grievances.

CORPORATE GOVERNANCE AND ETHICAL BEHAVIOUR

ASCC expects all its suppliers to comply with applicable laws and regulations. We ask that our suppliers commit to conducting business with integrity, transparency, and accountability. The expectations we hold for our suppliers include but are not limited to the following:

ANTI-CORRUPTION AND ANTI-BRIBERY

- Suppliers should avoid engaging in any form of corruption, bribery, or unethical practices.

FAIR COMPETITION

- Suppliers should compete fairly and ethically in the marketplace and refrain from engaging in anti-competitive practices such as price-fixing, bid-rigging, or market allocation. Suppliers should avoid anti-competitive agreements, violation of anti-trust laws and market abuse.

ANTI-MONEY LAUNDERING AND FRAUD PREVENTION

- Suppliers should adhere to strict anti-money laundering and counter-terrorism financing regulations and practices to prevent their services or products from being used for illegal financial activities. Suppliers should have processes in place to prevent the use of illicit funds.
- Suppliers shall have procedures in place which prevent embezzlement and fraud as well as maintain accurate accounting records which do not contain false documentation.

GIFTS, ENTERTAINMENT AND HOSPITALITY

- Suppliers should avoid offering gifts, favours, or entertainment such as bribes or kickbacks to our company's employees that could influence business decisions. Suppliers shall not provide the aforementioned to any ASCC employees, governmental/regulatory officials or third parties which might influence or appear to influence decision making.

CONFLICT OF INTEREST

- Suppliers shall promptly disclose any conflicts of interest that might arise in their relationship with ASCC, ensuring that such conflicts do not compromise objectivity, fair judgment, or decision-making. Suppliers shall avoid interactions that may conflict directly or in appearance with an employee's ability to act within the best interest of ASCC.

LEGAL REQUIREMENTS

- Suppliers shall comply with all international import and export trade compliance laws, regulations, and industry standards as they relate to ethics, integrity, and business practices.
- All necessary licenses, permits, certificates, registrations must be up-to-date and made available if requested.

LABOUR AND HUMAN RIGHTS

ASCC is dedicated to upholding the highest standards of labour and human rights across our supply chain. We believe that ethical practices and respect for human dignity are integral to the success and sustainability of our business. We are dedicated to eradicating modern slavery in all its forms and upholding the principles outlined in the Modern Slavery Act (*Australian Commonwealth, 2018*) through comprehensive prevention, detection, and reporting measures, and we expect the same of our suppliers. The expectations we hold of our suppliers include, but are not limited to, the following:

NO CHILD OR FORCED LABOUR

- Child labour/trafficking and forced labour is strictly prohibited.
- The supplier shall not employ individuals below the legal working age set by local laws and conventions. All work should be conducted by individuals who meet the legal age limit.
- The supplier shall not use any form of forced labour including prison labour, indentured labour, bonded or slave labour.
- Suppliers should vocalise a commitment to, and act in accordance with the Modern Slavery Act. They should be able to easily provide proof of this.

FAIR TREATMENT AND EQUAL OPPORTUNITY

- Suppliers should not discriminate against any individuals based on race, gender, religion, nationality, disability, or any other protected characteristic. Suppliers should ensure that equal hiring practices are utilised to include, but are not limited to job applications, promotions, rewards, training, conditions of employment, wages, benefits, and job assignments.
- Suppliers should provide a safe workplace where all employees are respected and treated fairly. Physical abuse, harassment, including sexual or sex-based harassment, mental/physical abuse/assault should be strictly prohibited.

FAIR WAGES

- Suppliers should pay fair wages in accordance with practices and applicable laws in the place of employment. Wages should include local statutory entitlements. Wages and benefits should be paid on time and in full.
- Wages should provide an adequate standard of living for employees and their families.
- Payments should be recorded.

WORKING TIME

- Suppliers should comply with legal limits on working hours and overtime. Adequate rest periods and time-off should be respected.
- Overtime hours should be voluntary and not requested regularly.
- Suppliers are expected to treat their workers fairly and demonstrate a commitment to fundamental human rights and freedoms.
- The supplier should provide equal employment opportunities.
- The supplier should promote work life balance and meet or exceed industry standards on working hours.

EMPLOYEE HEALTH AND SAFETY

At ASCC, the health and safety of all individuals within our supply chain is of paramount importance. We are committed to Zero harm, maintaining a safe work environment, and ensuring the well-being of employees, suppliers, and all stakeholders involved. The expectations we hold of our suppliers include but are not limited to the following:

EMPLOYEE/WORKER PROTECTION

- The supplier should have a safety management system for injury and illness prevention and reporting.

HAZARDS

- The supplier should eliminate hazards where possible, and where they cannot, provide appropriate controls as a minimum.
- The supplier should maintain high standards of health and safety in their operations to safeguard the well-being of employees, contractors, and local communities.

TRAINING

- The supplier should provide and conduct regular training for their employees, which contributes to a safe work environment.

ENVIRONMENTAL AND SOCIAL IMPACT

ASCC is committed to the importance of conducting its business operation with due care towards the environment and encourages its employees and suppliers to act in a responsible and diligent manner when dealing with environmental issues. Respecting the fundamental human rights of all external stakeholders is at the core of ASCC's values. We are unequivocally committed to upholding basic human rights, health, safety, and dignity of the communities we engage with. The expectations we hold of our suppliers include, but are not limited to, the following:

ENVIRONMENTAL LAWS AND IMPACTS

- The supplier is expected to comply with relevant environmental laws and permit requirements and conduct their business operations in a way that protects and sustains the environment, while co-operating with relevant authorities.
- The supplier should have appropriate management, operational or technical controls in place to minimise any impacts on the environment.

EMISSIONS, WASTE AND WASTEWATER

- The supplier should monitor, control, and treat wastewater generated from operations before discharge, and take appropriate precautions to prevent contamination of waterways. The supplier should reduce or eliminate polluted air emissions, waste and noise generated from operations.

CULTURAL AND SOCIAL IMPACTS

- Suppliers should respect local customs and cultures and seek to support social development initiatives.
- Suppliers should collaborate with local communities to ensure that operations do not infringe upon their rights to property and land.
- Suppliers should minimise any negative impact on communities and engage in philanthropic activities where possible.
- Suppliers are encouraged to contribute positively to the communities in which they operate.

QUALITY AND PRODUCT SAFETY

ASCC is dedicated to providing customers with products and services of the highest quality. Meeting safety standards ensures that regulatory requirements are met. The expectations we hold of our suppliers include, but are not limited to the following:

PRODUCT COMPLIANCE

- Suppliers should ensure that all products and services provided meet relevant legal requirements, industry standards and customer specifications.

QUALITY CONTROL

- Suppliers should have appropriate quality control measures in place and provide accurate product information, including handling, storage, and transportation requirements.

CORRECTIVE AND PREVENTATIVE ACTIONS

- Suppliers should promptly address any quality or safety issues identified, implement corrective actions and establish preventative measures to avoid future occurrences.

SECURITY AND DATA PROTECTION

ASCC places high importance on safeguarding sensitive information and maintaining robust data and IT security practices. The expectations we hold of our suppliers include, but are not limited to, the following:

DATA PRIVACY AND PROTECTION

- Suppliers should comply with data protection laws and regulations when processing personal information.
- Any collection and storage of data should be done in a lawful and secure manner.
- Suppliers shall only use and process data for ASCC on behalf of and for the purposes of ASCC as outlined in our written agreements.
- Supplier's systems that contain such information should be appropriately managed and protected against unauthorised access, destruction or disclosure.

ENCRYPTION AND SECURITY

- Suppliers should use encrypted technology to protect sensitive data, especially when using public networks or storing data on devices or servers.
- Suppliers should use intrusion prevention systems (i.e. Firewalls) to safeguard against unauthorised access and attacks.

PF007.1 CODE OF CONDUCT FOR SUPPLIERS

INCIDENT RESPONSE

- Suppliers should have incident response plan in place to detect and respond to security breaches or incidents which occur.
- Suppliers should inform ASCC of any breaches in IT/Data security which might negatively impact or threaten ASCC.

APPLICATION, COMPLIANCE AND ACCOUNTABILITY

Our suppliers should implement the respective measures outlined in this Code of Conduct. By adhering to the Code, suppliers play a vital role in promoting responsible and sustainable business practices and contribute to the overall success of ASCC and its stakeholders. The expectations we hold of our suppliers include but are not limited to the following:

FAMILIARITY AND APPLICATION OF THE CODE

- Suppliers are expected to familiarise themselves, their employers, and stakeholders with the Code. If necessary, suppliers should provide training programs in accordance with principles covered within the Code.
- Suppliers should establish mechanisms for their employees and stakeholders to implement the Code.
- Suppliers should promptly investigate and address reported issues, taking appropriate corrective actions.

MONITORING AND COMPLIANCE

- Suppliers should cooperate with ASCC on any audits assessments, and requests for information to verify compliance with this Code of Conduct.
- Non-compliance with this Code of Conduct may result in the termination or suspension of the supplier's relationship with the ASCC's.

ACCOUNTABILITY AND TERMINATION

- If ASCC determines that any Supplier has violated this Supplier Code, ASCC may either terminate its business relationship or require the Supplier to implement a corrective action plan. If corrective action is advised, but not taken, ASCC reserves the right terminate its business relationship with Supplier.

COMMITMENT STATEMENT

For ASCC, conducting business in a manner that is ethical, responsible, sustainable, and productive is fundamental to our company. If you share these commitments, we are proud to partner with you. If you have observed or have any information that demonstrates violations of this code, we ask that you share this with us so that we may continue to work together and move forward in the most conscientious way possible. Your commitment counts!

REVIEW

The policy is to be reviewed in accordance with PF049 Documents Control Policy.

Version	Date	Reason for Revision	Reviewer	Approved By
1.0	Nov 2014	New Document	People and Culture Manager, General Managers	L Wilkins CEO
2.0	Aug 2018	Reviewed and updated	People and Culture Manager, General Managers	L Wilkins CEO
2.1	30 Sep 2020	Added version control box	Operational Excellence Manager	L Wilkins CEO
3.0	06 Nov 2023	Reviewed and updated	General Managers, CFO, People and Culture, Strategic Director, Department Managers	M Frost CEO
3.1	04 Oct 2024	Reviewed no changes	Operational Excellence Manager	T Allum OEM