

# Supplier Code of Conduct

## Introduction

Elphinstone Pty Ltd (Elphinstone) is committed to ethical, sustainable and socially responsible procurement. As an important part of this commitment, we endeavour to align ourselves with suppliers who display high ethical standards and share similar values to us.

We expect that our suppliers operate in full compliance with all laws, rules and regulations of the jurisdictions in which they do business. However, we seek more than mere legal compliance from both ourselves and our suppliers. We expect all of our suppliers to commit to the standards of conduct outlined in this Supplier Code of Conduct (Code).

## Purpose

The Code sets out Elphinstone's minimum expectations of its suppliers in the following areas:

- (a) workplace health and safety;
- (b) labour and human rights;
- (c) integrity, ethics, anti-corruption and competition;
- (d) diversity and inclusion; and
- (e) environmental management.

Suppliers to Elphinstone are advised to review the Code and ensure that relevant areas of their businesses and supply chains meet the Code's standards.

## Scope

The Code applies to all suppliers to Elphinstone.

## Minimum Standards for Suppliers

The following table sets out the minimum standards expected of all suppliers.

Area of Compliance	Minimum requirement
<b>Workplace health and safety</b>	Suppliers must provide a healthy and safe work environment and comply with all applicable laws relating to workplace health and safety including: <ul style="list-style-type: none"><li>• managing occupational health and safety hazards;</li><li>• implementing systems for the prevention of occupational injury and illness;</li><li>• standards for fire safety;</li><li>• emergency preparedness and response plans;</li><li>• occupational or industrial hygiene standards;</li><li>• appropriate lighting and ventilation;</li></ul>

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<b>Category:</b>	All	<b>Policy Number:</b>	Supplier Code of Conduct	<b>Date Issued:</b>	21.04.2021
<b>Author:</b>	General Manager	<b>Approved By:</b>	General Manager	<b>Date Revised:</b>	

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Area of Compliance	Minimum requirement
	<ul style="list-style-type: none"> <li>reporting and investigation of occupational injuries and illness; and</li> <li>assigning responsibility for health and safety to a management representative.</li> </ul>
<b>Labour and human rights</b>	<p>Suppliers must comply with all applicable laws relating to wages, employment conditions, working hours, legally mandated benefits, health and safety, and anti-discrimination.</p> <p>Suppliers must not use, and must ensure to the extent possible that any supplier to it does not use, any form of child, forced or involuntary labour and must comply with international standards and domestic regulations relating to the employment of children.</p> <p>Suppliers must not engage or be complicit in any practices of Modern Slavery, as defined in the <i>Modern Slavery Act 2018</i> (Cth). Suppliers must investigate and assess risks of Modern Slavery within their operations and supply chain and notify Elphinstone as soon as possible of any suspected or confirmed cases of Modern Slavery within their operations or supply chain.</p> <p>Suppliers must only employ workers with a legal right to work in the relevant jurisdiction, including workers engaged through a labour hire or employment agency.</p>
<b>Integrity, ethics, anti-corruption and competition</b>	<p>Suppliers are expected to be ethical in their business activities, including relationships, practices, sourcing and operations, including:</p> <ul style="list-style-type: none"> <li>compliance with applicable anti-corruption laws relating to bribery, corruption, money laundering, fraud, tax evasion or similar activities;</li> <li>refraining from making or allowing facilitation payments when undertaking work for or on behalf of Elphinstone;</li> <li>compliance with all competition and consumer protection laws;</li> <li>identifying and reporting any conflicts of interest they have in their dealings with Elphinstone; and</li> <li>maintaining policies and practices to allow misconduct or grievances to be reported and addressed without fear of retaliation.</li> </ul>
<b>Diversity and inclusion</b>	<p>Suppliers should value and support diversity and inclusion in their businesses. Suppliers understand and embrace the principle that a workforce containing a diversity of skills, experiences and backgrounds enhances business outcomes.</p>

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Area of Compliance	Minimum requirement
<b>Environmental management</b>	Suppliers must comply with all applicable environmental laws and continually strive to improve their sustainability performance, including focusing on reduction of waste, carbon emissions, water and natural resources consumption. Suppliers must maintain an appropriate environmental management system that identifies and manages environmental impacts.

### Compliance and Breach

The Code contains Elphinstone's minimum standards for its suppliers. Suppliers must comply with the letter and intent of all laws and regulations relating to their business. If the local law allows an activity, practice or standard that is not permitted under this Code then the supplier must comply with the Code.

We require our suppliers to meet the Code's expectations and to share these expectations with their personnel, suppliers and subcontractors so that they are communicated through suppliers' organisations and supply chains. We encourage our suppliers to develop the necessary tools, record-keeping and management systems to support this compliance.

Elphinstone may require suppliers to conduct self-assessments and Elphinstone reserves the right to take necessary steps to verify compliance with the Code.

Suppliers must co-operate with any verification processes and in addition must notify Elphinstone of any breaches and take reasonable steps to address, remedy and prevent reoccurrence of any breach of the Code.

A breach of this Code may result in Elphinstone terminating our supply agreement or relationship with you.

Suppliers to Elphinstone have access to our Whistleblower Policy, which creates a confidential and safe way to report illegal, unethical, fraudulent or undesirable conduct to us. Our Whistleblower Policy is available to suppliers on request.

### Questions

Please direct any questions about this Supplier Code of Conduct to [admin@elphinstone.com](mailto:admin@elphinstone.com)

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