

## **Supplier Code of Conduct**

The purpose of this Supplier Code of Conduct (Code) is to detail Engagis Pty Ltd. minimum expectations and non-negotiable requirements in the areas of human rights and labour practices; environmental management; professional conduct; governance; and community engagement. Suppliers are advised to review the Code and ensure that relevant areas of their business and supply chain meet the requirements outlined in this document.

### **Application of this Code**

Engagis seeks to work with its Suppliers to meet and exceed minimum expectations and mandatory requirements as outlined in this Code and continuously strives to improve the standard of its business practices.

Fundamental to this Code is an expectation that all Suppliers operate in full compliance with all laws, rules and regulations of the jurisdictions in which they do business.

The expectations outlined in the Code are not intended to supersede or alter the Supplier's regulatory and contractual obligations. Suppliers should check their respective contracts, agreements and purchase orders as they may contain additional obligations or higher standards than those set out in this Code.

Engagis expects Suppliers to communicate the Code to their related entities, suppliers and subcontractors who support them in providing goods and services to Engagis, so that they are aware of, understand and comply with the Code.

### **Compliance with the Code**

Suppliers are expected to self-assess their compliance with the Code and take timely action to correct any deficiencies or breaches reported or identified by an audit, assessment, inspection, investigation or review. Suppliers are encouraged to raise any concerns, discuss and seek clarification accordingly to any elements of the Code with Engagis. If requested by Engagis, Suppliers must provide evidence and confirmation of their compliance with the Code, including the provision of documents and records that support their compliance. Suppliers are expected to support Engagis in reviewing compliance with

the Code. Engagis may cease dealing with any Supplier who is found to have acted unethically or illegally, or who has persistently failed to comply with the Code.

### **Reporting Breaches**

If a Supplier considers or suspects that another party has deviated from or breached their obligations under this Code, the Supplier is encouraged to report their concerns to Engagis senior management.

## **1. Human Rights and Labour Practices**

Engagis is committed to providing a fair, safe and healthy working environment. Suppliers are expected to provide a fair, safe and healthy workplace, which upholds high standards of human rights and integrates appropriate safety, human rights and labour policies and practices into its business.

### **Human Rights**

Suppliers are expected to provide goods and services in a manner consistent with any applicable human rights obligations.

### **Workplace Health and Safety**

Safety is our number one priority. Suppliers must comply with all applicable laws relating to workplace health and safety.

Suppliers are expected to:

- Manage occupational health and safety hazards; and
- Provide workers with job-related training and consult with employees in relation to the provision of information and training.

### **Anti-harassment**

Suppliers are expected to commit to a workplace free from workplace bullying, harassment, victimisation and abuse. Suppliers are expected not to bully workers or threaten workers with, or subject them to, unlawful or inhumane treatment. This includes, but is not limited to, abuse and harassment which can be verbal, physical, sexual or psychological.

### **Modern Slavery**

Engagis has a zero-tolerance commitment to all forms of slavery, forced labour, debt bondage, child labour and human trafficking within its supply chain, including all international elements of the chain.

Suppliers must:

- Ensure that all work is undertaken without coercion;
- Not use any form of forced, bonded or indentured labour;
- Employ only workers who are the applicable minimum legal age;
- Use all reasonable endeavours to ensure that third-party recruitment agencies, if used, are compliant with the provisions of this Code and applicable law;
- Be responsible for payment of all recruitment-related fees and expenses in recruiting foreign contract workers either directly or through third-party agencies;
- Support Engagis to identify areas of high-risk modern slavery in supply chains, investigate risks and if applicable, contribute toward and sponsor corrective actions;
- Notify Engagis as soon as it becomes aware of any instances of modern slavery taking place in its supply chain or in any part of its business;
- Support Engagis in any other way required to meet its obligations under the *Australian Modern Slavery Act 2018 (Cth)*.

### **Working hours, Wages and Benefits**

Suppliers must:

- Follow all applicable laws and regulations with respect to wages, working hours and workers compensation insurance; and
- Ensure that all workers receive their legally mandated minimum wages, benefits, superannuation, leave entitlements and time off for legally recognised holidays.

### **Freedom of Association**

Suppliers are expected to freely allow workers to associate with others, form and join (or refrain from joining) industrial organisations or associations of their choice and bargain collectively, or engage in any lawful industrial activity without interference, discrimination, retaliation or harassment.

## **2. Environmental Management**

Engagis is committed to environmentally responsible and sustainable work practices. Suppliers are expected to minimise the environmental impact of their operations and maintain environmentally responsible policies and practices.

### **Environmental Impacts**

Suppliers must comply with all applicable laws and regulations relating to the environment, including any management and reporting obligations. Suppliers are expected to manage the environmental impact of their operations by:

- Ensuring the safe storage, transportation and disposal of hazardous substances including hazardous waste;
- Maintaining policies and practices for the efficient use of energy, water and natural resource consumption; and
- Maintaining policies and practices that reduce the risk of pollution, loss of biodiversity, deforestation, damage to ecosystems and greenhouse gas emissions.

## **3. Professional Conduct**

Engagis expects high standards of professional conduct and compliance with all applicable laws.

Suppliers are expected to:

- Maintain appropriate standards of behaviour, conduct and ethics in their dealings with Engagis;
- Comply with all anti-bribery, anti-corruption and anti-money laundering laws;
- Not engage in, either directly or indirectly, fraudulent, corrupt or collusive activities;
- Conduct themselves in a manner that is fair, professional and that will not bring Engagis into disrepute; and
- Be ethical in their business activities, including relationships, practices, and operations.

### **Confidentiality**

Suppliers must not improperly use any private, confidential or commercially sensitive information in its possession relating to or in connection with its dealings with Engagis.

### **Conflict of Interest**

Suppliers must:

- Declare to Engagis any situation that raises an actual, potential or perceived conflict of interest related to or in connection with its dealings with Engagis; and
- Avoid financial, business or other relationships which may compromise the performance of their duties under their business arrangement with Engagis.

### **Gifts, Benefits and Hospitality**

Engagis personnel must:

- Conduct themselves with the highest standards of integrity, impartiality and accountability;
- Perform their duties without favouritism, bias or for personal gain; and

Suppliers are expected not to:

- Offer Engagis personnel gifts or benefits, either directly or indirectly, and offers of hospitality will be limited to token offers of basic courtesy; or
- Take any action in order to entice or obtain any unfair or improper advantage.

## **4. Governance**

A commitment to sound management, risk and corrective action systems are key to a reliable supply chain for Engagis. Suppliers are therefore expected to maintain sound administration processes and risk management frameworks.

### **Record Keeping**

Suppliers are expected to maintain adequate records that accurately record all financial transactions and information regarding their business activities, labour, health and safety,

and environmental practices in accordance with applicable laws, policies and procedures. Disclosure of information is expected to be undertaken without falsification or misrepresentation.

### **Risk Management**

Suppliers should develop and maintain a process to identify, manage and control relevant risks associated with its operations. These include supply chain risks and risks relating to human rights and labour practices, the environment, and professional conduct.

### **Critical Incident Management**

Suppliers should:

- Identify and assess potential critical incidents, emergency situations and business continuity risks; and
- Develop and implement emergency plans and response procedures that minimise harm to life, environment and property, while minimising disruption to business continuity.

### **Audits and Assessments**

To ensure compliance with this Code and the applicable laws, Suppliers are expected to:

- Perform periodic evaluations of their facilities and operations, and the facilities and operations of their subcontractors;
- Evaluate modern slavery risks in their supply chains, assess these risks with their suppliers, document corrective actions; and
- Cooperate openly and honestly with any Engagis audit, assessment or review.

## **5. Community Engagement**

Engagis is committed to socially responsible procurement. We strive to make a genuinely positive impact by identifying opportunities to engage social enterprises and supporting the employment of Aboriginal and Torres Strait Islander peoples, local communities, people with disabilities and those people underrepresented in the workforce or from a disadvantaged background.

## Integrated Management System

### Supplier Code of Conduct



Suppliers are encouraged to:

- Have programs in place to promote local community employment, including employment of the disadvantaged and underrepresented people in society; and
- Support Engagis to achieve community engagement commitments for ourselves and on behalf of our customers.

*Vuk Milonjic*

---

Vuk Miljonc

Chief Executive Officer

March 29, 2022

---

Date