HSEQ-33 Supplier Code of Conduct

# Scope and Application of this Document

We seek to engage suppliers who share our commitment to responsible business practices and who will work with us to achieve our shared sustainability goals. Ampcontrol Limited and its related entities (“Ampcontrol”) will work in collaboration with its Suppliers to meet and exceed minimum expectations as set out in this Code and continuously strives to improve the standard of its business practices.

For the purposes of this Code, Supplier means any entity that supplies goods or services, including construction works and services, to Ampcontrol. Workers, includes employees, contractors, agency and temporary staff of the Supplier and its related entities.

Where the Code refers to the law it means the laws in the jurisdiction that apply where the goods are procured or services are performed. Underpinning 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 set out in the Code are not intended to supersede or impact in any way on a Supplier’s regulatory and contractual obligations.

Ampcontrol expects all existing and new Suppliers to commit to the Code. By entering into a business relationship/agreement with Ampcontrol, suppliers are committing to abide by the Code.

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

# Acting with Integrity and Reliability

Ampcontrol expects high standards of ethical conduct and compliance with all applicable laws. Suppliers are expected to be ethical in their business activities, including relationships, practices, sourcing and operations and to:

* act with honesty, objectivity, openness and transparency;
* do not participate in fraudulent conduct or accept bribes, anti-competitive practices, inducements, unauthorised commissions, donations or gifts;
* do not disclose confidential information or misuse information obtained at work for personal gain or benefit;
* protect the assets and resources of Ampcontrol;
* comply with all relevant legislation, regulations, standards and customs;
* follow defined Ampcontrol policies, procedures, guidelines and instructions; and
* undertake all business activities with impartiality and address any conflict of interest.

# Whistleblower protections for reporting significant breaches of this code

In accordance with Ampcontrol’s Whistleblower Policy, individuals including employees of suppliers, contractors, associates or consultants, may at any time make a report of misconduct, dishonest or illegal activity in relation to this Code of Conduct, free from recrimination or victimisation. The *Corporations Act 2001* (Cth) (“the Act”) protects Eligible Whistleblowers from prosecution.

If appropriate, individuals should first report any matters of concern to their relevant contact person at Ampcontrol.

In the alternative, disclosures can be made to the Whistleblower Investigation Officer (“WIO”), via the following contact details:

**ATTENTION: Whistleblower Investigation Officer**

* Telephone: +61 2 4961 9000
* Email: whistleblower@ampcontrolgroup.com

Reports to the WIO must be made by email or by telephone, and the Discloser must first inform the WIO that they wish to make a report under this Policy.

Alternatively, individuals may make a report to Ampcontrol’s external independent whistleblowing service using any of the following methods:

* calling the hotline number 1300 933 977 within Australia; or
* visiting our unique reporting platform online https://ampcontrol.grapevineonline.com.au/

Reports to this service will be de-identified and then forwarded to the WIO for action.

# Respect in the Workplace and Human Rights

Ampcontrol believes that all workers in its supply chain deserve to be treated with dignity and respect.

We support human rights in accordance with the United Nations (UN) Universal Declaration of Human Rights, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work and the UN Guiding Principles on Business and Human Rights (UNGPs).

Suppliers are expected to provide a fair and ethical workplace, which upholds high standards of human rights and complies with all relevant legislation. As a minimum Suppliers are required to demonstrate the following standards in their workplace:

* do not discriminate, bully or harass in the workplace;
* respect diversity by treating others with fairness and equality;
* provide and maintain a healthy and safe working environment;
* always maintain the dignity of others;
* support and respect others by showing consideration;
* uphold a person’s rights to privacy and confidentiality as defined in Ampcontrol policies and procedures; and
* act in a manner of cooperation, trust and support, working as one team toward the same goals.

Suppliers are also expected to provide goods and services in a manner consistent with the United Nations Declaration of Human Rights and the International Labour Organisation (ILO) standards.

Ampcontrol does not tolerate labour exploitation, including modern slavery practices. All suppliers are expected to proactively identify, address and – where required by legislation – report on risks of modern slavery practices (defined broadly to include all forms of human trafficking, forced labour and slavery-like practices) in their business operations and supply chains.

At a minimum, suppliers are expected to:

* ensure that all work is freely chosen and undertaken without coercion;
* comply with laws and regulations with regard to appropriate working hours, benefits, leave entitlements;
* not use any form of forced, bonded or indentured labour;
* employ only workers who are the applicable minimum legal age for employment, in line with standards set by the ILO;
* ensure workers are not charged excessive, unlawful, or retaliatory fees for services or goods provided by an agent or employer; and
* support workers rights to freedom of association.

# Modern Slavery

Modern slavery is as defined in the *Modern Slavery Act 2018* (Cth) (“Modern Slavery Act”) as including any conduct constituting a modern slavery offence (as defined within the Modern Slavery Act), and/or any conduct involving the use of any form of slavery, servitude or forced labour to exploit children or other persons taking place in the supply chains of government agencies or nongovernment agencies.

Modern slavery legislation means both the Modern Slavery Act and any applicable any local or national modern slavery legislation.

Suppliers warrant that you comply with modern slavery legislation, that there are no outstanding investigations of breaches of the legislation, and that you have not been convicted of any offence under applicable modern slavery legislation.

Where Tin, Tungsten, Tantalum, or Gold (3T&G) are used, you must maintain source of origin or smelter records, which can be provided to us when requested.

You must comply with any requests made by us to provide assistance, information, documents or interview any person as reasonable, to enable us to discharge our obligations under modern slavery legislation.

# Health Safety and Environment

Worker health, safety and well-being is important to Ampcontrol. Suppliers are expected to provide a healthy and safe work

Suppliers are expected to:

* comply with all applicable laws relating to workplace health and safety.
* 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.

Ampcontrol is committed to promoting environmental responsibility. Suppliers are expected to minimise the environmental impact of their operations and maintain environmentally responsible policies and practices.

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;
* implementing and maintaining policies and procedures which address waste in line with the national waste reduction targets and sustainable packaging guidelines, or other schemes in the relevant jurisdiction;
* maintaining policies and practices that reduce the risk of pollution, loss of biodiversity, deforestation and damage to ecosystems; and
* demonstrating a genuine commitment to reducing operational and supply chain greenhouse gas emissions and, where possible, the alignment to emissions reductions according to the Paris Agreement in limiting global warming to 1.5 degrees Celsius.

# 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 the relevant Ampcontrol manager under their contract. If requested by Ampcontrol, 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 Ampcontrol in reviewing compliance with the Code.

To ensure compliance with this Code and the applicable laws, Suppliers are expected (at a minimum) to:

* perform periodic evaluations of their facilities and operations, and the facilities and operations of their subcontractors; and
* cooperate openly and honestly with any Ampcontrol, assessment, audit or review , and provide evidence of record-keeping and documentation.

If, for any reason, any of our suppliers or partners cannot adhere to the standards set out in this Supplier Code of Conduct, Ampcontrol is committed in the first instance to working in good faith to achieve compliance. Ongoing breaches of this Code will result in a breach of contract and Ampcontrol may be forced to cease the business relationship.