

SUPPLIER CODE OF CONDUCT



Austin Engineering Limited (“Austin,” “we,” “our,” “its,” or “us”) wants to conduct business with ethically, environmentally, and socially responsible suppliers.

This Supplier Code of Conduct (“Code”) sets out the expectations that Austin has in our dealings with suppliers, contractors and consultants (“Suppliers” or “you”) and outlines what constitutes a responsible supplier.

The Code highlights our commitment to operating according to ethical standards. An ethical and reliable supply chain is critical to our ability to support our customers achieve their goals. To support Austin, and to maintain the integrity of our activities, we require our Suppliers to endorse the principles set out in the Code by outlining clear standards and expectations.

1. Application

This Code applies to all procurement activities regardless of their value. Suppliers should refer to the Code when considering supplying to Austin. Austin reserves its right to conduct business only with suppliers who can demonstrate compliance with this Code and all laws and regulations of the countries in which operations are managed or services are provided.

Suppliers are expected to proactively self-assess their compliance and take action to remedy any shortcomings. In applying the Code, Austin will consider both the value and complexity of the procurement activity and may include questions on the Code in its procurement documentation. Suppliers with queries on how the Code is applied in any procurement activity should contact Austin’s relevant senior manager or its Chief Operating Officer.

The Code is intended to complement existing laws, rules, regulations, related Austin policies, procedures and terms and conditions. In the event that the expectations of this Code are not met, the business relationship may be reviewed, and corrective action pursued subject to the terms of the related procurement contracts.

2. Compliance with Relevant Legislation

In addition to any specific items mentioned within this Code, Suppliers must comply with all relevant legislation, regulations and standards.

3. Ethical Expectations

Our procurement is conducted in an environment of integrity, probity and accountability. We are committed to the highest ethical standards and expect our suppliers to commit to the same. Suppliers can show this by doing the following:

3.1. Ethical Conduct

By entering into any contract with, or accepting any purchase order placed by Austin, you are committing to conducting your activities in a manner consistent with this Code. All of your

business activities must comply and be performed in a manner that is fair, ethical and compliant with this Code and all international trade laws, sanctions and regulations of the countries in which Austin operates.

3.2. Managing Conflicts of Interest

You and your personnel, and their close relatives, friends or associates must ensure that all conflicts of interest (whether actual, reasonably perceived or that could arise in future) are disclosed as soon as possible.

3.3. Demonstrating High Standards of Conduct

Suppliers must ensure that its business’s behaviour is beyond reproach. You must not engage in fraudulent or corrupt activities including, for example, bribery or money laundering, or act in any manner which, by association, places Austin into disrepute.

3.4. Cybersecurity and Data Protection

A diligent and practical approach must be taken to ensure sensitive information is appropriately managed in line with confidentiality agreements, the *Privacy Act 1988* (Cth.) and any other applicable data privacy laws and policies.

3.5. Not Engaging in Inappropriate Supply Market Behaviour

You should encourage innovation and competition and must not act in a manner which involves a misuse of your market power or would be otherwise improper (e.g. collusive arrangements). You must comply with applicable competition laws of all countries in which you conduct business dealings.

3.6. Proper Conduct Toward Austin Employees

You are expected to be respectful of the requirements of the Code that our staff need to meet, and not engage in actions which run counter to these obligations. You must not try to influence decision making through the use of inducements (e.g. offering gifts and benefits).

3.7. Model good business practices

Your business should be conducted in a way that shows best practice corporate management. This includes promoting a collaborative relationship where Austin and the supplier work together to resolve issues in a timely and respectful manner. This helps to avoid contractual disputes and promotes good working relationships.

3.8. Due Diligence

You are expected to exercise reasonable due diligence to prevent and detect corruption in all business arrangements.

3.9. Record Keeping

You are expected to keep appropriate records to demonstrate compliance with this Code as well as all applicable laws and regulations. This includes creating accurate records and not altering any record entry to conceal or misrepresent underlying transactions. Records must be

retained based on applicable documentation retention requirements.

4. Workplace health and safety

We want to conduct business with suppliers who support the welfare of their employees. You can show this by doing the following:

4.1. Managing Workplace Health and Safety

As well as complying with all workplace health and safety laws and regulations, you should provide safe and healthy workplaces and also regularly manage and review workplace hazards.

4.2. Treating Employees Fairly

You must respect all worker's workplace rights and entitlements and ensure compliance with all relevant workplace laws, regulations and instruments. This includes properly paying employees (without deduction), giving them their entitlements, not discriminating unlawfully and committing to workplaces free of harassment. You must create and maintain an environment that treats all employees with dignity and respect and must not use or threaten violence, coercion, sexual exploitation or abuse, or verbal or psychological harassment or abuse.

4.3. Acting Against Human Rights Exploitation in the Supply Chain

Suppliers must make all reasonable efforts to ensure that businesses within its supply chain are not benefiting from, engaged in or complicit with, human rights exploitations such as human trafficking, forced, bonded, involuntary labour or child labour, coercion, or any type of modern slavery practice as defined in the *Modern Slavery Act 2018* (Cth) (the Act). You agree to provide reasonable assistance to us on request and if required for the purposes of preparing a statement under the Act.

4.4. Ensuring workplace diversity

We value businesses that have policies and practices in place to encourage diversity and ensure equal employment opportunity for all people. You are expected to provide a work environment in which everyone is treated fairly and gender, cultural, ethnic, religious or other diversity factors are respected.

4.5. Fair wages and working hours

We value suppliers who provide wages and benefits that satisfy, at a minimum, national legal standards or local industry benchmarks.

5. Environmental Expectations

We want to procure in a way that also protects and advances environmental priorities. You must comply with all applicable environmental laws, regulations and requirements. You can show this by doing the following:

5.1. Enhancing Environmental Sustainability

You must establish, maintain and enforce practices that prioritise environmental protection

and sustainability. Things you can do include, but are not limited to:

- waste minimisation and recycling
- reducing and/or offsetting carbon emissions
- using solar or other renewable energy where possible
- reducing the use of energy, water or other resources
- implementing conflict mineral policies around the bulk purchase of cobalt, tin, tungsten, tantalum and/or gold, have functional policies and transparent measures to assure that products and components supplied are free of cobalt, tin, tungsten, tantalum and/or gold originating from conflict mineral sources
- reducing the use of hazardous and toxic substances, and ensuring their correct disposal

6. How to Deal With Suspected Breaches of the Code

Concerns should be raised in accordance with Austin's Whistleblower Policy.

- Web: <https://www.austineng.com/whistleblower-policy/>
- Email: austina@austineng.com.au

Any concerns regarding illegal activity or corruption should be immediately referred to Austin Engineering Limited.

Compliance with the Code will assist in avoiding breaches of Austin's Code of Conduct and Anti-bribery and Anti-Corruption Policy.