

## Policy Statement

SPC expects its customers, contractors, suppliers, and their sub-tier suppliers to adhere to the same high standards and values when conducting their business and business with SPC. Suppliers should adhere to all applicable laws and regulations and use their best efforts to comply with the principles of this *Supplier Code of Conduct*.

SPC will sell or purchase goods or services and engage and contract with Suppliers based on value, quality, compliance with SPC standards and requirements. The *Supplier Code of Conduct* provides an opportunity for SPC to communicate its position on the following principles and set clear expectations of Suppliers, including consequences where those are intentionally disregarded.

## Scope

In this Policy, "SPC" includes all entities in the SPC group of companies. This policy applies to SPC customers, suppliers and contractors who provide a material or service to all SPC subsidiaries and sites.

## Principles

### Diversity and Non-Discrimination

SPC prefers Suppliers who promote diversity in their supplier chain. Diversity includes differences that relate to gender, age, cultural background, disability, religion, sexual orientation. It also relates to differences in background, life experience, interpersonal and problem-solving skills. Suppliers must not engage or support discrimination in hiring and employment practices.

### Bullying and Harassment

Suppliers must not use violence, threats of violence or other forms of physical coercion or harassment. Mental, physical, verbal, or sexual harassment or abuse are prohibited, as is harsh or inhumane treatment.

### Freedom of Association

Suppliers must respect workers' freedom of association, recognise, and protect their right to collective bargaining and to form, join and administer worker's organisation. They must not discriminate, harass, intimidate, or retaliate against workers for being members of a union or participating in trade union activities.

### Prohibit the Practice of Forced and Bonded Labour, Slavery, Slave-like Practices and Human Trafficking

Suppliers must not engage in or use forced, bonded (including debt bondage), prison, or any other involuntary labour, whereby work is performed under threat of physical or other penalty. Suppliers must take steps to ensure that their operations are free of slavery, slave-like practices, and human trafficking.

### Prohibit the Practice of Child Labour

Suppliers must strictly prohibit the use of child labour in line with the International Labour Organisation's (ILO):

- Minimum Age Convention 138
- Worst Form of Child Labour Convention 182

These conventions stipulate that no child below the age of 15 years (or 14 years where applicable) is allowed to work.

### Provide Safe and Healthy Working Conditions

A safe and healthy workplace environment must be provided for all employees, temporary/agency staff, and contractors. Hazards and risks in the workplace must be identified and action taken to minimise these. Appropriate equipment, resources and training must be provided to workers to ensure they can safely carry out their duties.

### Ensure Reasonable Working Hours and Wages

Working hours must comply with national laws and/or collective agreements (whichever provides the greater level of protection for workers). Wages and benefit should meet, at a minimum, national legal guidelines or industry benchmarks, whichever is greater.

### Confidentiality

Suppliers must not improperly use any private, confidential, or commercially sensitive information in its possession relating to its dealings with SPC. Suppliers must treat the data of SPC and its customers as confidential and only use that data for the purposes of providing services to SPC.

# Supplier Code of Conduct Policy



## Management Systems

Suppliers must adopt management systems that effectively meet the needs of their operation and are able to embed the requirements of SPC's *Supplier Code of Conduct* into their business practices.

## Continuous Improvement

SPC expects its suppliers to establish goals, milestones, and systems to ensure and demonstrate continuous improvement with compliance to the *Supplier Code of Conduct*.

## Prohibit the Use of Un-Authorised Sub-Contracting

Suppliers must not use un-authorized sub-contractors and will declare in writing all sub-contractors prior to their use.

## Conduct Business Lawfully and With Integrity

Suppliers must conduct their business ethically, legally, honestly, and transparently, in a manner without fraudulent or illegal practices (including misleading advertising, conflicts of interest, improper payments, bribery, or corruption).

## Protect the Environment

Suppliers must:

- Comply with applicable environmental laws, standards, and notices from regulators. Identify, monitor, minimise and treat hazardous pollutants released to air, water, and soil,
- Work to reduce the use of raw materials and resources in the operations, as well as the elimination, substitution, re-use and recycling of materials and solid waste, and
- Identify, monitor, and minimise greenhouse gas emissions and energy consumption from their own operations.

## Transparency

Suppliers must be truthful and transparent in providing information to SPC in the course of their business relationship.

## Establish Grievance and Remedy Procedures

Suppliers must provide their workers (and those with whom the conduct business) with an avenue to lodge anonymous grievances without fear of punishment or harassment. Raised concerns will be dealt with appropriately and in a timely manner.

## Report Violations

The Supplier must report any suspected violation of regulations, laws and/or the *Supplier Code of Conduct* to its procurement contact.

## Operation of this policy

SPC will be continuously monitoring this policy through sedex and/or other internal or external assessments, which may include third-party audits.

Intentional disregard for the provisions of SPC's *Supplier Code of Conduct*, or failure to meet these standards may impact the Supplier's business relationship with SPC.

Approved by Robert Giles

Chief Executive Officer

26/08/2022