

## Policy Statement

The Supplier Guiding Principles offer SPC Global Ltd (ACN 633 389 394) and its subsidiaries (collectively referred to as SPC) an opportunity to clearly communicate their stance on certain principles and establish precise expectations for their suppliers, along with the potential consequences of non-compliance. These Principles serve as a policy that outlines SPC's expectations for all suppliers. Suppliers must ensure that their subcontractors and supply chain comply with this Policy. In addition to complying with this policy, all suppliers must uphold the relevant standards and responsible business practices outlined in SPC's Human Rights Policy. SPC reserves the right to amend these Principles from time to time.

## Scope

This policy applies to all suppliers and contractors and who provide goods or services to SPC. For the purposes of this policy, 'SPC' refers to all entities within the SPC group of companies. Acceptance of these Principles and commitment to comply with them is part of any supplier contractual arrangement with SPC.

## Principles

At SPC, we expect our suppliers to share our commitment to responsible sourcing and human rights. The principles outlined in this policy are based on internationally recognised standards and industry best practices, including the United Nations Guiding Principles on Business and Human Rights, the International Bill of Human Rights, and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work. Adhering to these principles ensures that we conduct our operations in a manner that respects the human rights of all individuals involved.

### Diversity and Non-Discrimination

SPC requires suppliers to promote and respect diversity. Suppliers must not discriminate based on race, age, gender, gender identity, colour, ethnicity, religion, country of origin, sexual orientation, marital status, pregnancy, dependents, disability, social class, union membership, political views, or any other condition protected by applicable law or regulation. Furthermore, suppliers must not engage or support discrimination in any aspect of their hiring and employment practices, including compensation, promotion, discipline, termination, and retirement.

### Bullying and Harassment

Suppliers must not use violence, threats of violence, or any other forms of physical coercion or harassment towards their workers. Mental, physical, verbal, or sexual harassment or abuse, as well as harsh or inhumane treatment, are strictly prohibited. All workers have the right to be treated with respect and dignity, and suppliers must have policies and practices in place to prohibit the use of corporal punishment and prevent workers from being subjected to any other forms of physical, sexual, psychological, or verbal harassment or abuse. Disciplinary practices must be conducted in a professional and ethical manner, and monetary penalties should not be used.

Suppliers must provide all workers with access to confidential grievance mechanisms, so that workers can raise concerns or complaints about any violations of their rights, or any other issues related to their employment.

### Freedom of Association

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

This Policy does not prevent, discourage, or limit employees from engaging in concerted activity for the purpose of collective bargaining or other mutual aid or protection, or from exercising their constitutional, statutory, or legally protected right.

## 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 forms of involuntary labour, whereby work is performed under the threat of physical or other penalties.

Furthermore, suppliers must ensure that their operations are free of slavery, slave-like practices, and human trafficking. SPC strictly prohibits the use of all forms of forced, bonded, indentured, or compulsory labour, including prison labour, military labour, and any form of human trafficking. All workers must work under voluntary conditions and have the freedom to terminate their employment at any time.

## Prohibit the Practice of Child Labour

Suppliers must not directly or indirectly, through their contractors or subcontractors, use child labour. They must have policies in place that prohibit the use of child labour in line with the following international conventions:

- The International Labour Organization's (ILO) Minimum Age Convention 138
- The Worst Forms of Child Labour Convention 182

These conventions stipulate that no child below the age of 15 years is allowed to work, subject to exceptions allowed by the ILO and applicable law (such as light work on family farms that does not interfere with necessary legal education). Children above the minimum age of employment should not be exposed to undue physical risks that can harm physical, mental, or emotional development. No person under the age of 18 shall be employed at night or in hazardous conditions, such as operating heavy machinery or handling hazardous chemicals.

## Responsible Recruitment

Suppliers shall uphold professional, ethical, safe, secure, and responsible recruitment practices with the intention of preventing unnecessary risk exposure, exploitation, and unreasonable financial bonds being imposed on recruits. SPC expects its suppliers to abide by the 'The Employer Pays Principle.' As such, suppliers must ensure that individual workers and job seekers are not charged for their jobs and that the cost of recruitment should be borne, not by the worker, but by the employer.

Additional consideration should be given to protect migrant workers – people working outside their country of origin – against additional vulnerabilities towards human right abuses and exploitation. Suppliers are required to implement or strengthen relevant human resources management systems and policies to address risks to migrant workers. Migrant workers shall not be threatened with denunciation to authorities or withholding of official documents with the intention of coercing them into employment terms or impacting their ability to leave.

## Provide Safe and Healthy Working Conditions

Suppliers must ensure that their workplace provides a safe and healthy environment for all employees, including temporary and agency staff, and contractors. Hazards and risks in the workplace must be identified, and appropriate action must be taken to minimize them. Workers must be provided with appropriate equipment, resources, and training to safely carry out their duties.

Additionally, suppliers must provide workers with access to clean drinking water, hygienic toilet and handwashing facilities, adequate heat and ventilation, and sanitary facilities for food storage and accommodations. All facilities must have clearly marked and unrestricted exits in case of an emergency.

If living accommodations are provided for workers, whether by the supplier or a third-party contractor, the facilities must be clean, safe, and structurally maintained.

## Ensure Reasonable Working Hours and Wages

Suppliers are required to comply with national laws and/or collective agreements to ensure that workers are not overworked. In determining the working hours, whichever provides the greater level of protection for workers must be considered. The wages and benefits provided to workers must meet or exceed the minimum standards set by national legal guidelines or industry benchmarks.

Workers are entitled to rest periods, annual leave, and holidays with pay, in accordance with national laws and regulations. Suppliers are encouraged to provide workers with at least one consecutive 24-hour rest period every seven days, where not otherwise required by law.

## Confidentiality

Suppliers must not misuse any private, confidential, or commercially sensitive information that they have access to relating to their dealings with SPC. All data and information of SPC must be treated as confidential and used solely for the purpose of providing services to SPC.

## Management Systems

Suppliers must adopt management systems that effectively meet the needs of their operation to ensure compliance with the requirements of SPC's Supplier Guiding Principles and embed these principles 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 Unauthorised Sub-Contracting

Suppliers must not use sub-contractors without obtaining prior written approval from SPC. Suppliers must ensure that all sub-contractors are made aware of these Principles through written communication or training. Suppliers are responsible for ensuring that their sub-contractors comply with these Principles.

## Conduct Business Lawfully and With Integrity

Suppliers must conduct their business ethically, legally, honestly, and transparently, and without fraudulent or illegal practices. This includes avoiding misleading advertising, conflicts of interest, improper payments, bribery, or corruption. Suppliers must not make any payments, offers, gifts, promises, incentives, or provide anything of value in exchange for an improper business advantage, directly or indirectly.

Suppliers must comply with all applicable laws and regulations in the countries in which they operate. They must also comply with all laws and regulations applicable to the provision of products and/or services to SPC. This includes full compliance with anti-corruption and anti-bribery laws, as well as all applicable laws and regulations related to the protection, privacy, and/or processing of data and information. Suppliers must not cause SPC to be in violation of any such laws and regulations.

## Protect the Environment

Suppliers must comply with applicable environmental laws, standards, and notices from regulators. They must identify, monitor, minimize, and treat hazardous pollutants released to air, water, and soil. Suppliers must also work to reduce the use of raw materials and resources in their operations. This includes the elimination, substitution, re-use, and recycling of materials and solid waste. Finally, suppliers must identify, monitor, and attempt to minimise greenhouse gas emissions and energy consumption from their own operations.

## Establish Grievance and Remedy Procedures

Suppliers must provide their workers and those with whom they conduct business with an avenue to lodge anonymous grievances. Workers must be able to do so without fear of punishment or harassment. Any 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. This includes any violation related to ethical business practices, labour standards, environmental regulations, anti-corruption laws, and any other applicable laws or regulations.

## SPC's obligations to its Suppliers

SPC understands that its suppliers are key partners in enabling us to do better every day. SPC will abide by the following principles when dealing with our suppliers:

- Always treat all of its suppliers honestly, ethically, and fairly.
- Not intentionally mislead suppliers.
- Not take advantage of honest supplier errors.
- Work to resolve any issues or disputes on a fair and factual basis.

## Monitoring and Compliance

Suppliers are expected to proactively manage compliance with this Policy and report to SPC any known non-compliance with its principles promptly. SPC reserves the right to monitor supplier compliance using self-declarations, questionnaires, or external audits.

Suppliers authorize SPC and its designated agents to engage in monitoring activities, including on-site audits with reasonable notice, on an annual basis. SPC may conduct additional audits to investigate potential non-compliance, review corrective actions, or comply with regulatory or third-party inquiries.

## Addressing Non-Compliance

If SPC becomes aware of supplier conduct that does not comply with this Policy, it will investigate and discuss the findings with the supplier. The supplier must assist with the investigation and provide requested information.

In the event of serious or persistent violations of this Policy or if the supplier consistently fails to meet the requirements, SPC will evaluate the conduct of the supplier on a case-by-case basis. SPC reserves the right to terminate any agreement or business relationship with the supplier if it determines that such action is necessary.

Approved by Hussein Rifai



SPC Global Ltd Chairman  
16/05/2023