

# **EMERGENT COLD**

## **Corporate Code of Conduct**

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2 August 2018

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**Amendment Log Sheet**

Version Number	Date	Amendment Details	Pages	Section	Approved By
1	23/02/2018	First Emergent Cold Issue	All Reviewed		Rick Vine
2	02/08/2018	Finalised Document for distribution			West Hutchinson
3					

## Corporate Code of Conduct

### **1 Background**

Emergent Cold group of companies is formed from many organisations, some with hundreds of years' history of operation. They have been recognised as acting responsibly in the course of achieving their commercial success. Our reputation for fair dealing and integrity is a great asset; preserving this asset depends on maintaining our high standards. Compliance with this Code is an essential part of our doing so.

This Code applies to all Relevant Persons and is applicable wherever Emergent Cold does business. In the case of joint ventures, the Emergent Cold representatives involved/concerned are expected to act in accordance with this Code themselves and to use reasonable endeavours to influence those with whom they are working to ensure they also act to similar standards of integrity and ethical behaviour.

This code establishes general principles. Certain areas covered by the Code may be the subject of more detailed provisions and requirements established by other documents.

### **2 Interpretation**

#### **2.1 In this Code:**

"Advantage" - Includes any money, gift, loan, fee, reward, commission, employment, payment, release, discharge, contract, service, promise and any other favour.

"Connected Person" - Includes any family member or relative of a Relevant Person and any company which is controlled by a Relevant Person or a family member of a Relevant Person.

"Government Official" - Includes any officer or employee of any Government Entity or any candidate for political office.

"Government Entity" - Means any national, regional or local government and any department, agency or instrumental thereof and any entity owned or controlled by another Government Entity.

"Relevant Persons" - Means the employees (including secondees), officers and directors of Emergent Cold and its subsidiaries.

### **3 Operating Principles**

#### **3.1 Emergent Cold's operating principles commit Emergent Cold and Relevant Persons:**

- To maintain high standards of business ethics and corporate governance.
- To deal appropriately with employees, those with whom we do business and the communities in which we operate.

### **4 Implementing Our Operating Principles**

#### **4.1 Responsibility**

Responsibility for the implementation of this code ultimately rests with the CEO/MD/President and Board of Directors of each Emergent Cold subsidiary, who are expected to oversee implementation of the code to their

individual business units, be responsible for communicating its content to employees and business partners, and ensuring compliance.

## 4.2 Business Ethics

Emergent Cold is committed to conducting all its businesses with integrity and fairness. Relevant Persons are expected to maintain the highest standards of professionalism in all their dealing with others. They seek mutually beneficial relationships with contractors, suppliers and joint venture partners. They are required to promote the application of this Code in all dealings and to give preference in business dealings to those who adhere to similar business ethics. All Relevant Persons must comply with all applicable legal requirements.

## 4.3 Conflicts of Interest

A conflict of interest arises where a person's private interests interfere with the proper discharge of their official duties. Emergent Cold is committed to conducting its business without conflicts of interest and this Code requires all Relevant Persons to avoid any situation which may lead to an actual or perceived conflict of interest. Set out below is a non-exhaustive list of circumstances that would potentially give rise to a conflict of interest:

- Working for a non-Emergent Cold company or non-affiliated organisation at the same time as being employed by Emergent Cold.
- Becoming a member of a board of any non-affiliated commercial, financial or industrial organisation.
- A Relevant Person or a Connected Person negotiating or transacting business with Emergent Cold (other than employment contracts or retail purchases of Emergent Cold products).
- Having an interest in a company (other than as a holder of securities in a company whose securities are listed on any stock exchange) which either competes with or has business dealings with Emergent Cold.

## 4.4 Competition and Anti-trust

Emergent Cold is committed to complying with all applicable competition and antitrust laws.

Relevant Persons should acquaint themselves and comply with the applicable competition laws to which their businesses are subject. These are laws that aim to protect competition by prohibiting anti-competitive behaviour. Breach of competition laws is a serious offence and may expose Emergent Cold to severe penalties and other sanctions, and individuals to imprisonment. Set out below is a non-exhaustive list of anti-competitive behaviour which would potentially amount to an infringement of competition laws:

- Participating in price fixing, collective boycotts or market sharing arrangements.
- Exchanging competitively sensitive information with competitors.
- Imposing restrictions on customers or suppliers, including retail price maintenance.
- Abusing a position of substantial market power or market dominance.

## 4.5 Bribery

Emergent Cold believes that conducting business with integrity is critical to continuing to develop Emergent Cold as a successful, sustainable and responsible business group. Corruption hinders economic, social and political development and progress. Breach of anti-bribery laws, wherever and however this takes place, is a serious offence and may expose Emergent Cold to significant fines and other penalties, and individuals to imprisonment. Even the appearance of a breach of anti-corruption laws can cause very significant damage to Emergent Cold's reputation.

Emergent Cold's commitment to conducting its business with integrity and in accordance with appropriate ethical standards is an established policy. Violations of the policy are a serious disciplinary offence. Emergent Cold is committed to upholding its standards wherever it operates, with the intention that the countries and communities in which it does business should properly benefit from its operations.

It is Emergent Cold's policy that all Relevant Persons should comply with the anti-bribery laws to which they are subject. This Code sets out the standards of behaviour expected from Emergent Cold and the anti-bribery compliance procedures adopted by Emergent Cold.

#### **A. Accepting Advantages**

Relevant Persons should not solicit or accept any Advantages from any person or company having business dealings with Emergent Cold (e.g. clients, suppliers, contractors). However, they are allowed to accept (but not solicit) the following gifts offered voluntarily:

- Advertising or promotional gifts of a nominal value; or
- Gifts given on festive or special occasions subject to a maximum limit of USD\$100.

Any Advantage or gift accepted by a Relevant Person should be in accordance with Emergent Cold's procedures for "Acceptance of Gifts or Advantages" described in Appendix A.

Relevant Persons should decline an offer of a gift if acceptance of it could affect the Relevant Person's objectivity, or induce the Relevant Person to act against Emergent Cold's interests, or lead to questions of bias or impropriety.

#### **B. Offering Advantages**

Under no circumstances may a Relevant Person offer an Advantage to any person or company having business dealings with Emergent Cold for the purpose of influencing such person or company in any business dealings. Relevant Persons should also exercise good judgment and practice moderation in giving gifts. Excessive gifts in terms of value or frequency should not be offered to potential or existing customers. Gifts bearing an Emergent Cold logo are preferred. Any offer of advantage or gift given in the conduct of the Emergent Cold's business should be in accordance with Emergent Cold's procedures for "Offer of Gifts or Advantages" (Appendix B).

#### **C. Observing local laws when working in another jurisdiction**

Sections A and B above apply whether the solicitation, acceptance and offering of Advantages are within or outside Australia. Any Relevant Person who conducts business on behalf of Emergent Cold in another jurisdiction must abide by the laws of that jurisdiction, including laws and regulations on anti-corruption, and all other laws and regulations pertaining to ethical business conduct.

#### **D. Payments to Government Officials**

It is strictly prohibited to offer an Advantage to any Government Official. Prohibited advantages should not be made directly, through a Relevant Person's own personal involvement, or indirectly, for example by authorising or allowing a third party to provide a prohibited advantage on behalf of Emergent Cold. Any request for an advantage by any Government Official in relation to gaining business or a business advantage for Emergent Cold must be refused and promptly reported to an appropriate director or officer of Emergent Cold.

#### **E. Charitable contributions and sponsorship**

Use of Emergent Cold's resources to make or solicit contributions to charitable organisations or other organisations, if done in accordance with applicable laws and regulations, is appropriate. Nevertheless, care must be taken to ensure that such activities do not create, or appear to create, an improper Advantage covered by this Code. Relevant Persons must comply with procedures for "Charitable Contributions and Sponsorship" (Appendix C) for contributions or solicitations of contributions by Emergent Cold to charities or other organisations.

## **F. Entertainment and Corporate Hospitality**

Although entertainment is an acceptable form of business and social behaviour, Relevant Persons should not accept lavish or frequent entertainment from persons with whom Emergent Cold has business dealings if, by doing so, it might be perceived that they are placing themselves in a position of obligation to the offer. When giving entertainment, company functions are normally preferable to entertaining individuals, though this does not preclude meals and similar entertainment for moderate expense for individuals with whom Emergent Cold has dealings. The business purpose of entertainment and corporate hospitality should be documented.

Relevant Persons should be particularly vigilant concerning entertainment offered to them overseas and turn down invitations to meals or entertainment that are excessive in nature or frequency and appear to have no or minimal business purpose. It should be noted that any free trips or travelling expenses are considered as Advantages.

Without the prior consent of Emergent Cold, acceptance of these advantages is strictly prohibited. Relevant Persons should follow the procedures for “Entertainment and Corporate Hospitality” (Appendix D).

## **G. Travel Expenses**

Travel expenses incurred on behalf of a person or company (including a Government official or a Government Entity) that are directly related to promoting, demonstrating, explaining, or certifying Emergent Cold’s products or services, or that are directly related to executing or performing a contract with Emergent Cold, may be proper.

In practice, for purposes of promoting, demonstrating or explaining its services, Emergent Cold may occasionally invite a person or company (including a Government Official) to travel to its facilities, offices and exhibits for plant tours, product demonstrations or business meetings at Emergent Cold’s expense. Emergent Cold may reimburse such persons or organisations for reasonable and bona fide expenditures directly related to any such purpose, such as travel or lodging expenses. Reimbursed travel expenses may include the reasonable cost of such person or organisation’s transportation, meals, lodging and entertainment.

## **H. Agents and Consultants**

No individual or entity may be hired to commit bribery on behalf of Emergent Cold. Relevant Persons should take steps to ensure that agents or consultants fully comply with the applicable anti-corruption laws to which they are subject and to appropriately encourage them to adhere to the general principles as set out in this Code. Terms of engagement of agents and consultants should be clearly documented and duly approved, whilst performance of agents and consultants should be monitored.

Special care must be taken when Emergent Cold engages the service of an agent, consultant or third party, when such party is expected to assist in developing business with potential customers or where such party will be involved in obtaining any government approvals or action. The Relevant Person should follow the procedures for “Engaging an Agent or a Consultant” (Appendix E).

No consultant or agent should be proposed for consideration if there are suspicious circumstances that are not satisfactorily resolved. For example, that party:

- Has a reputation for corruption;
- Is likely to make improper payments or gifts;
- Requests that his/her identity be kept secret; or
- Requests (without reasonable commercial justification) that he/she or she be paid offshore, up front or in cash.

## **I. Joint Venture Partners and Contractors**

Emergent Cold may be held responsible for the conduct of those whom Emergent Cold hires to conduct business on its behalf or with whom Emergent Cold joins to conduct business. Relevant Persons should ensure that these entities understand this Code and should comply with the procedures for “Joint Venture Partners and Contractors” (Appendix F).

Relevant Persons are required to take all reasonable steps to ensure that joint venture partners, contractors or any other individuals or companies hired to conduct business on behalf of Emergent Cold and over which Emergent Cold has direct control develop and implement anti-corruption policies consistent with the general principles of this Code. All such individuals or companies over which Emergent Cold does not have direct control should be required contractually (and where not legally possible be appropriately encouraged) to adhere to the general principles set out in this Code.

## **J. Loans**

Relevant Persons and Connected Persons should not grant or guarantee a loan to or, accept a loan from or through the assistance of, any individual or organisation having business dealings with Emergent Cold. For instance, a conflict of interest arises when a supplier acts as a guarantor on a bank loan for an employee. There is, however no restriction on normal bank lending made on normal commercial terms.

## **K. Training**

All Relevant Persons should attend scheduled Code of Conduct training.

## **4.6 Political Non-Alignment**

Emergent Cold, as a normal business activity, will lobby Government Entities either directly or through trade associations to promote policies that encourage business and achieve workable legislation. Emergent Cold is not however, politically aligned and accordingly Relevant Persons in their official capacity should not offer direct or indirect support (“political contributions” – either in cash or in kind) to any specific political party, candidate or campaign. Examples of political contributions include:

- Sponsorship of events organised by or associated with any political party, politician or candidate for public office.
- Free or discounted use of Emergent Cold’s premises, services or products as an in kind donation.

## **4.7 Gambling**

Relevant Persons should not engage in frequent or excessive gambling of any kind with other Relevant Persons or with persons having business dealings with Emergent Cold. In social games of chance with clients, suppliers or business associates, they must exercise judgment and withdraw from any high stake games.

## **4.8 Procurement principles**

In procurement Emergent Cold requires Relevant Persons to support the following principles:

- Each company in the group should develop policies to the size of the purchase above which tendering should be carried out. For purchases exceeding this limit, suppliers should be selected on the basis of competitive tendering including the impartial selection of appropriately qualified suppliers.
- Whenever competitive tendering above the size thresholds is not carried out a file note explaining why such tendering was not done should be produced and kept on the supplier file.



- Re-tendering should in general take place at least every five years. Monitoring systems should be put in place to ensure the proper fulfilment of contractual obligations and to provide reasonable assurance that fraudulent or corrupt activities are prevented.

#### **4.9 Keeping of Records**

Emergent Cold is committed to keeping proper records and following sound accounting policies. All company books, records, accounts and invoices must be created and maintained so as to reflect fairly and accurately and in reasonable detail the underlying transactions and the disposition of company business. All relevant expenses should be properly approved and recorded in the financial records.

This Code prohibits all Relevant Persons from making any false or misleading statements or other entries in financial records. This Code also prohibits Relevant Persons from creating, maintaining and using any off-the-record accounts with banks or any other third parties and from destroying company records before the normal destruction date.

#### **4.10 Use of Information/Company Property**

This Code strictly prohibits Relevant Persons from providing or making available confidential or insider information to anyone outside Emergent Cold without proper authorisation. Similarly, this Code strictly prohibits Relevant Persons from making use of confidential or insider information to secure advantage personally or for another party.

The unauthorised appropriation of goods and services belonging to Emergent Cold for personal use or resale and the unauthorised use of Emergent Cold's assets for personal benefit are strictly prohibited.

Relevant Persons should not alter equipment or facilities or install software without specific authorisation or develop their own applications without management approval. Security precautions should be exercised when using personal computers, and all computer software should be used in strict compliance with the laws of copyright.

#### **4.11 Whistleblowing**

All Relevant Persons have a responsibility to raise concerns about potential violations of the Code, including possible improprieties in financial reporting and internal controls. Any such concerns should be raised in the first instance by staff with their immediate superior and if no satisfaction is gained then with the head of the department or to Emergent Cold ([ethics@emergentcold.com](mailto:ethics@emergentcold.com)). If a substantive complaint is received, an impartial and prompt investigation will be held. If the issue still remains unresolved, it will be raised to the head of the relevant business unit. Any material concerns raised through the head of the relevant business unit will be reported to Emergent Cold Executive which may also involve an independent 3<sup>rd</sup> party.

#### **4.12 Health and Safety and the Environment**

Emergent Cold is committed to doing its best to safeguard the health and safety of its employees, those with whom it does business and the communities within which it operates. Achieving this depends on the sustainable development of its business and the communities in which it operates. To this end, Emergent Cold is committed to being a good steward of the natural resources and biodiversity under its influence and to ensuring that all potential adverse impacts of our operations on the environment are identified.

#### **4.13 Equal Opportunities, Diversity and Respect in the Workforce**

Emergent Cold believes in equal opportunities for all its employees. Emergent Cold recognises that its businesses benefit from the diversity of its workforce. So it follows naturally that Emergent Cold encourages diversity and

equal opportunities. A properly diverse workforce is one whose members are not discriminated against. Relevant Persons must be fully compliant with applicable employment and other laws and must not tolerate unlawful discrimination based on individual's race, sexual orientation, religion, gender, age or marital status. Harassment, bullying or other breaches of applicable law is not acceptable.

Unacceptable conduct must be reported to line managers or business unit heads.

#### **4.14 Use of Social Media**

Relevant Persons should not use any social media tools in any way which will bring Emergent Cold into disrepute, disclose confidential information, interfere with the privacy of colleagues or those with whom Emergent Cold does business, imply Emergent Cold's endorsement of personal views or breach any applicable laws or regulations. Making negative or disparaging comments on Social media, regarding work or Emergent Cold, outside of working hours is in breach of this code.

#### **4.15 Privacy**

Relevant Persons should comply with applicable legal requirements relating to the collection, holding, processing, disclosure and use of personal data. The privacy of others and the confidentiality of information received in the course of business must be respected.

#### **4.16 Outside Employment**

Relevant Persons (except for non-executive directors) who wish to take concurrent paid employment, either on a regular or consulting basis must seek the prior written approval of the CEO/MD of their Business Unit before accepting the employment.

#### **4.17 ILO (International Labour Organisation) Declaration on Fundamental Principles and Rights to Work**

Emergent Cold is committed to respect and promote:

- freedom of Association and the effective recognition of the right to collective bargaining;
- the elimination of forced or compulsory labour;
- the abolition of Child Labour; and
- the elimination of discrimination in respect of employment and occupation.

### **5 Alcohol and Other Drugs**

The use of illegal drugs or misuse of legal medications or other substances is not condoned or permitted under any circumstance within any Emergent Cold workplace. Alcohol must not be consumed, or offered at any Emergent Cold operational workplace without the authority of the CEO/MD/President.

Attendance at any workplace by any individual who is deemed not fit for work will be stood down pending further investigation which in turn may lead to disciplinary action.

### **6 Compliance with the Code**

Relevant Persons should not seek to avoid these provisions by using agents, partners, contractors, family members or parties acting on their behalf.

Anyone who is in breach of the Code will be subject to disciplinary action, which may include termination of employment. In cases of suspected corruption or other criminal offences, reporting will be made to the relevant authorities, as considered appropriate.

## Appendix A

### Acceptance of Gifts or Advantages

#### Control Guideline

Relevant Persons should not solicit or accept any advantages from any person or company having business dealings with Emergent Cold (e.g. client, suppliers, and contractors).

However, they are allowed to accept (but not solicit) the following gifts offered voluntarily:

- Advertising or promotional gifts of a nominal value; or
- Gifts, usually of a consumable nature, given on festive or special occasions subject to a maximum value of USD \$100.

#### Procedures

**All gifts (except advertising or promotional gifts of a nominal value) which are offered voluntarily to Relevant Persons should be declared by the Relevant Person and acknowledged or approved by his/her immediate supervisor/department head, and the Personnel/HR Department.**

## Appendix B

### Offer of Gifts or Advantages

#### Control Guideline

Under no circumstances may a Relevant Person offer an Advantage to any person, including government officials, or company having business dealings with Emergent Cold for the purpose of influencing such person or company in any business dealings.

Relevant Persons should exercise good judgment and practice moderation in giving gifts. Excessive gifts in terms of value or frequency should not be offered to potential or existing customers.

Gifts bearing an Emergent Cold logo are preferred.

#### Procedures

- **For gifts offered to speakers or facilitators of training/briefing seminars/talks which are given on a complimentary basis, corporate items should be requested/used with clear information on the purpose of the request and name of the receiver & his/her company.**
- **For offer of gifts/advantages, Relevant Persons should get proper approval from Head of Divisions/Operating Companies.**
- **Prior approval by a Director should be obtained for offer of gifts/advantages with value exceeding \$USD100 or equivalent.**

## Appendix C

### Charitable Contributions and Sponsorship

#### Control Guidelines

Relevant Persons should ensure that any contributions or sponsorship are made in accordance with normal corporate practices and that such recipients are appropriate in the context of our business and corporate values.

#### Procedures for Charitable Contributions & Sponsorships

- Charitable contributions and sponsorships are only given to recognised charitable bodies with a strong track record of delivering value to the community / the environment.
- All such contributions and sponsorships by Emergent Cold to the charitable body should be authorised by CEO/MD/President or above. The initiators should obtain approval with sufficient supporting details including date, purpose and amount, etc.
- Such contributions and sponsorships as are offered are managed by and accounted for in the Emergent Cold budget by the Finance Department.

#### Procedures for Commercial Sponsorship

- Commercial contributions and sponsorships are only given to recognised legal entities with a strong track record of providing the appropriate level and type of exposure for corporate sponsors in return for the sponsorship.
- All such contributions and sponsorships by Emergent Cold should be authorised by CEO/MD/President level or above. The initiators should obtain approval with sufficient supporting details including date, purpose and amount, etc.
- Such contributions and sponsorships as are offered are managed by and accounted for in the Emergent Cold budget by the relevant corporate department.

## Appendix D

### Entertainment and Corporate Hospitality

#### Control Guideline

Relevant Persons should be particularly vigilant in offering or being offered entertainment and turn down invitations to meals or entertainment that are excessive in nature or frequency.

#### Procedures on Entertainment

- When staff need to entertain or pay for meals for customers or business associates, they are expected to use their judgment to determine whether the kind of entertainment is appropriate, and expenses incurred are reasonable. Factors like Company image, local customs, etc. should always be considered.
- If several staff are present at the same event, the staff of the most senior level should pay and file an expense claim to be approved by his/her manager followed by the Head of Department or CEO/MD/President
- Expenses for entertainment given will be logged as per established expense claim process.
- Hospitality offered to employees which may appear excessive/disproportionate and/or includes travel should be declined unless authorised by senior management.
- Hospitality received of a value greater than USD\$100/head should be notified to senior management

#### Procedures on Corporate Hospitality

- Corporate hospitality events are arranged by the relevant departments from time to time to recognise the support given to Emergent Cold by our tenants, business partners & journalists/media representatives and to build relationships with them.
- Larger events will be separately budgeted; smaller events may be covered under departmental entertainment budget. Approval for the payment of such events must follow Emergent Cold payment approval matrix.
- Corporate hospitality events should generally involve either gifts of low/nominal value or small items of low value.

## Appendix E

### Engaging an Agent or a Consultant

#### Control guideline

Relevant Persons should take all reasonable steps to ensure that agents or consultants who are engaged fully comply with applicable anti-corruption laws to which they are subject.

#### Procedures

- **As practicable as possible, invite 2-3 potential service providers to submit proposals/quotations.**
- **Meet with potential service providers and clearly communicate the Emergent Cold Supplier Code of Conduct and operating principles prior to engaging them. The service providers will need to complete and sign a questionnaire so as to ensure their compliance to the Emergent Cold Supplier Code of Conduct.**
- **Review their “Terms of Service” and check their current and former client references.**
- **Whenever possible, a reasonable assessment of the background of service providers should be carried out, including industry experience, credit check and history of its legal proceedings.**
- **Obtain approval from the designated management personnel when the suitable service provider is selected before signing contract.**
- **Direct appointments may be necessary in special circumstances and in such cases, prior written approval from the relevant department head or CEO/MD should be obtained.**



## Appendix F

### Contractors

#### Control Guideline

Relevant Persons are required to take reasonable steps to ensure that contractors, or any other individuals or companies hired to conduct business on behalf of Emergent Cold and over which Emergent Cold has direct control develop and implement anti-corruption policies consistent with the general principles of this Code, or at least comply with relevant local laws.

#### Procedures for selecting contractors

- **All Relevant persons are required to inform joint venture partners and contractors of Emergent Cold Code of Conduct where practicable.**
- **Before engaging new contractors, a reasonable due diligence should be carried out on their track record, financial status and history of legal proceedings.**
- **Any new contractors are requested to confirm they will comply with applicable anti-corruption laws to which they are subject.**
- **All Relevant Persons will prepare the pre-determined specifications/requirements/scope of services for the products/services required.**
- **Invite for tenders from contractors should be made as appropriate. Exceptions should be duly approved by the CEO/MD and documented.**
- **Tenderers are evaluated based on their capability, financial strength, company structure and reputation.**
- **Additional due diligence is performed by checking their current and former client references, as well as relevant work permits and licenses where applicable.**
- **Meet with tenderers and clearly communicate on the Emergent Cold Supplier Code of Conduct (Appendix G) and operating principles prior to engaging them.**
- **Contract will be awarded to the tenderer which offers the best value for money, complies with Emergent Cold Supplier Code of Conduct, and meets our service standard.**

## Appendix G

### Supplier Code of Conduct

As a minimum the Code of Conduct outlined below should be followed by all Emergent Cold suppliers.

#### **Legal and Regulatory Compliance**

- Suppliers must comply with all applicable laws and regulations wherever they operate.

#### **Environment**

- Suppliers will have appropriate systems in place to assess, measure and seek to reduce the environmental impacts of their operations.

#### **Child Labour**

- No employee should be below the local legal minimum age.
- In addition, no employee should be below 16 years old unless part of a recognised professional apprenticeship programme.

#### **Forced Labour**

- Suppliers must not use any form of forced, coerced or bonded labour.

#### **Compensation and Working Hours**

- All employees will have written contracts that comply with local laws.
- Suppliers shall comply with the local legal minimum wages where applicable and are encouraged to follow local voluntary codes.
- Salary should be paid promptly and not more than one month in arrears.
- Overtime should be compensated according to the law and within legal working hour limits.

#### **Industrial Relations**

- Suppliers will have in place communications mechanisms and grievance procedures that allow employees to raise concerns and complaints with management.

#### **Health and Safety**

- Suppliers will adopt and communicate health and safety policies and procedures that aim to reduce injury and illness and enhance employee health.
- Employees will receive training with regard to site safety and their own obligations with regard to ensuring the safety of themselves and other employees.

#### **Discrimination**

- Employment should be granted based on suitability for a job.
- Suppliers shall not discriminate on the basis of gender, race, national origin, age, marital status, maternal status, sexual orientation, religion or disability.

#### **Suppliers and subcontractors**

- Suppliers should be encouraged to have their own supplier code of conduct in place.
- Suppliers and subcontractors should be paid accurately and on time.

#### **Bribery and corruption**

- Suppliers will have policies, codes of conduct and procedures in place to avoid all forms of bribery, corruption and fraud and ensure they are enforced.

#### **Auditing and inspections**

- Suppliers shall allow us access to relevant documents necessary to demonstrate compliance with this code of conduct, and facilities and sites to conduct audits in line with this code of conduct