

Pact Group Holdings Ltd
ACN: 145 989 644

Supplier Code of Conduct



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Pact Group Holdings Ltd and its wholly owned subsidiaries (**Pact Group**) are committed to high standards of business ethics which hinge on the central premise of acting with integrity in interactions with all stakeholders. Pact Group is a signatory to the United Nations Global Compact and is continuously working to align its operations and business strategy with the ten universally accepted principles regarding human rights, labour, environment and anti-corruption. Pact Group expects its Suppliers to maintain the same high standards.

Application of this Code

This Supplier Code of Conduct (**Supplier Code**) sets out Pact Group's expectations of its suppliers of goods and services, contractors, consultants and trading and business partners (**Suppliers**). Pact Group expects that all Suppliers involved in the supply of goods and services observe the highest standards, and conduct business in an ethical and professional manner, at all times. Suppliers must take reasonable steps to ensure that this Supplier Code is communicated to, understood and complied with by their employees, contractors, agents and sub-contractors.

Ethical standards

Pact Group is committed to observing the highest standards of fair dealing, honesty, integrity and ethical behaviour in its business activities. It expects its Suppliers (and their supply chains) to commit to the same standards, including to:

- ensure bribery and corruption is not tolerated;
- report any actual or potential conflicts of interest in dealings with Pact Group;
- ensure goods and services are not sourced on behalf of Pact Group from any country, entity or persons subject to internationally recognised trade sanctions;
- ensure any gifts and hospitality offered or received are reasonable and comply with Pact Group's gift policy (please refer to Pact Group's [Code of Conduct](#) for further information);
- ensure that no offering from a Supplier is given for the purpose of enticing or trying to obtain advantage;
- comply with applicable local, state, federal and international laws and regulations in all locations where they operate and interact with Pact Group;
- comply with all competition laws in the jurisdictions in which they operate;
- respect Pact Group's confidential information and not disclose this information, except as required by law or where authorised in writing by Pact Group; and
- ensure protection for whistleblowers.

Labour and human rights

Labour and human rights

Pact Group is committed to being an equal opportunity employer and to ensuring its workplace is free of unlawful discrimination, harassment and bullying. Pact Group expects its Suppliers to:

- provide a fair and ethical workplace and maintain high standards of human rights;
- maintain and implement appropriate labour and human rights policies and practices;
- not discriminate against any employee based on age, disability, ethnicity, gender, marital status, political affiliation, race, religion, sexual orientation, gender identity, union membership, or any other status protected by law;
- have a zero tolerance for bullying, harassment and discrimination, whether physical, sexual, psychological or verbal;
- pay their workers lawful wages, including equal pay for equal work;
- provide fair working conditions for their employees; and
- allow freedom of association and collective bargaining in accordance with local laws.

Suppliers are expected to proactively identify, address and report on risks of modern slavery practices in their business operations and supply chains. Modern slavery describes situations where coercion, threats or deception are used to exploit victims and undermine their freedom. It can include all forms of human trafficking, slavery, servitude, forced labour, forced marriage, debt bondage and child labour. Please refer to Pact Group's [Modern Slavery Policy](#) for further information.

Pact Group expects its Suppliers to identify any potential or actual adverse impacts their operations might have on human rights and to implement prevention, mitigation and remediation processes. Suppliers are further expected to maintain accurate and complete records to ensure that the supply chain of all goods and services provided to Pact Group can be traced. These records must be made available to Pact Group upon request.

When collecting, handling and storing personal information, Suppliers must comply with the *Privacy Act 1988* (Cth) and any other applicable laws or regulations. Please refer to Pact Group's [Privacy Policy](#) for further information.

Health and safety

Workplace health, safety and well-being is important to Pact Group and it is committed to ensuring all work is completed incident and injury free. Suppliers are expected to:

- provide their employees with a safe and healthy workplace in compliance with all applicable laws, regulations and industry requirements;
- continuously monitor safe working practices and manage occupational health and safety hazards;
- maintain and implement formal health and safety policies and standards; and
- manage and report workplace incidents.

Environmental management

Environmental management

Pact Group is committed to continuously improving the environmental performance of its operations and services and considers that its reputation as an environmentally engaged company is one of its greatest assets. Pact Group is committed to upholding this position throughout its operations and expects its Suppliers to:

- conduct their operations in compliance with all applicable laws and regulations and in accordance with their ethical, community and social responsibilities;
- actively minimise waste and emissions;
- comply with all laws and regulations relating to the storage, movement and disposal of hazardous materials and hazardous waste; and
- maintain policies and practices for the efficient use of energy, water and natural resource consumption and set targets for reducing greenhouse gas emissions, waste disposal to landfill, energy and water consumption.

Application and monitoring

All new and existing Suppliers of Pact Group are required to comply with this Supplier Code and demonstrate their commitment to doing so.

Compliance with this Supplier Code will be used as part of Pact Group's Supplier evaluation, selection and contract management process. Pact Group may require Suppliers to provide evidence of their compliance with this Supplier Code including (without limitation), by requiring Suppliers to cooperate with audit processes and site assessments, complete self-evaluations, or supply documentary evidence to enable Pact Group to verify the Supplier's compliance.

Reporting concerns or breaches of this Supplier Code

If a Supplier has any concerns regarding compliance with this Supplier Code, they should contact Pact's Procurement Team via email: procurementops@pactgroup.com

Pact Group's [Whistleblower Policy](#) also details processes where concerns or misconduct can be reported confidentially.

Version Control Page

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