

Barrenjoey Supplier Code of Conduct

1 Introduction

Barrenjoey is committed to maintaining high standards of ethical conduct in our organisation and supply chains. We consider our suppliers to be an extension of our business and recognise their contribution to our good reputation and success. As such, we expect our suppliers to act with integrity and to demonstrate a commitment to ethical business practices.

The purpose of this Code is to set out the standards of business conduct with which our suppliers are expected to comply.

For the purpose of this Code, a “supplier” includes:

- an individual, business or entity with which Barrenjoey has direct contracts and who provide Barrenjoey with goods or services (or both); and
- the owners, directors, officers, employees, contractors, and agents (if any) of the above.

2 Business Conduct and Human Rights

Barrenjoey supports the protection of human rights and expects all suppliers to have systems in place to monitor and address human rights issues. At a minimum, Barrenjoey expects our suppliers to:

- **conduct** business in a **fair, honest, legal** and **safe** way;
- **comply** with all applicable **laws and regulations** in the countries in which they operate;
- **provide** a **fair** and **formal reporting mechanism** to allow staff to raise grievances without fear of detriment or retaliation;
- **disclose** any actual or potential **conflicts of interest** arising due to personal or business relationships, and have appropriate systems in place to avoid or appropriately manage conflicts;
- **provide** their staff with a **safe and hygienic working environment**, minimise health and safety risks and implement accident prevention measures;
- **provide** staff with **fair pay and benefits**, without any unauthorised deductions, according to the laws of the countries in which they operate;
- **ensure working hours** are **compliant** with local laws, and that overtime is paid and voluntary;

- under **no** circumstances use **forced labour**, illegal child labour, participate in human trafficking or engage in deceptive recruitment practices;
- under **no** circumstances require staff to post a **deposit or bond**;
- under **no** circumstances require staff to surrender their **passports or work permits** as a condition of employment;
- **permit** staff to **terminate their employment** at any time **without penalty** upon provision of reasonable notice;
- **promote** a workplace that is free from **bullying, harassment, and discrimination**, including on the basis of race, ethnicity, gender, religion, age, disability, sexual orientation or any other basis prohibited by law; and
- **respect** rights of workers to exercise **freedom of association** and **collective bargaining**, where permitted by local law.

3 Environment

Barrenjoey is committed to minimising the environmental impacts of our business activities.

We encourage suppliers to share in this commitment. Our suppliers must comply with all applicable laws, regulations, and directions, such as those relating to resource consumption, waste, hazardous materials, and air emissions.

Barrenjoey also encourages its suppliers to seek opportunities to lessen the environmental impact of their operations and adopt measures to prevent and reduce harm to the environment.

4 Diversity and Inclusion

At Barrenjoey, we recognise that we can only create great outcomes for our clients and positive results for the community in which we operate by inviting diverse participation and perspectives.

We seek to work with suppliers that actively demonstrate a commitment to the principles of diversity and inclusion, including when selecting teams to work with Barrenjoey.

5 Compliance

Suppliers should immediately report any non-compliance with this Code to their Barrenjoey contact person.

In addition, Barrenjoey reserves the right to request information from suppliers to assess their compliance with this Code. Barrenjoey expects suppliers to work

cooperatively with us during the assessment process and, where necessary, implement any remedial actions Barrenjoey reasonably requests to address any compliance issues or concerns.

In the event Barrenjoey becomes aware of any non-compliance with this Code, we reserve the right to reconsider our business relationship with any supplier.

It is the responsibility of our suppliers to ensure that their staff, agents, and contractors are aware of and understand this Code.

6 Whistleblowing

Suppliers may confidentially report matters which qualify for protection under the Australian statutory whistleblower protection regime via the following link: <https://barrenjoey.com/contact/>

7 Updates

This Code may be updated from time to time to reflect changing businesses practices, Barrenjoey policies and standards, community expectations as well as changes to applicable laws and regulations. Suppliers can find the current Code on our website:

<https://barrenjoey.com/wp-content/uploads/2022/12/Supplier-Code-of-Conduct.pdf>