L A N D E R <u> <u> <u> </u> <u> </u> <u> </u> R O G E R S</u></u>

Supplier Code of Conduct

1. PURPOSE & SCOPE

Lander & Rogers carefully selects its suppliers and expects all contractors, consultants, and suppliers to comply with all applicable laws and regulations and to adopt the same high ethical compliance standards that we do, including in the following areas:

- human rights;
- labour;
- social and environmental responsibility;
- anti-bribery and corruption; and
- data security, protection and privacy.

This Supplier Code of Conduct applies to all suppliers of goods and services to Lander & Rogers.

We expect all suppliers to ensure their agents, employees, representatives and third parties involved in business with Lander & Rogers comply with this Supplier Code of Conduct.

We also expect that suppliers influence their own supply chain to adopt the same values, principles and standards reflected in the Code of Conduct.

2. SUPPLIER EXPECTATIONS

Suppliers are expected to adhere to the principles described in this section.

2.1 Human rights

Suppliers are expected to support and respect the protection of internationally proclaimed human rights and make sure that they are not complicit in human rights abuses.

2.2 Labour

Suppliers are expected to engage and manage their employees and contractors ethically and comply with applicable laws and regulations. This includes the following:

- Employees and contractors should be compensated appropriately for their work.
- Working hours should not exceed the maximum of hours regulated by local laws.
- Working environments should be free from any type of unlawful discrimination, harassment, vilification, victimisation and bullying.
- Staff should be free to join a union or any employee representation and be free from any form of retaliation.

Suppliers are expected to comply with all applicable health and safety laws and regulations and ensure all occupational health and safety hazards are managed.

Suppliers are also expected to mitigate against risks of modern slavery within their own workforce as well as supply chain. Modern slavery describes serious exploitation

including, but not limited to, human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage and/or child labour.

2.3 Social and environmental responsibility

Suppliers are expected to be committed to social and environmental responsibility, including but not limited to:

- promoting diversity, equality, respect and inclusion;
- promoting reconciliation and contributing to Australia's effort to close the gap between Aboriginal and Torres Strait Islander peoples and the wider community; and
- the management of their business in an environmentally responsible manner, to care for the environment in which we live and work and to sustain its quality for the benefit of future generations.

2.4 Anti-bribery and corruption

Suppliers are expected to conduct business in an honest, fair and transparent manner and work against corruption in all its forms, including extortion and bribery.

Suppliers must never accept, solicit, agree to receive, promise, offer or give a bribe, kickback or other improper payment or undue advantage (including gifts and hospitality), in order to obtain or retain business or any other improper business advantage.

2.5 Data security, protection and privacy

Suppliers are expected to adhere to all applicable legislation and adopt high standards regarding data security, security, and privacy to ensure all of Lander & Rogers' information remains confidential and secure during and after any engagement.

Suppliers will not share Lander & Rogers' information without Lander & Rogers' approval to third parties.

Suppliers can only share information that is publicly available on our website.

2.6 AI Use

Suppliers who use client data require our prior, express and written consent before using or deploying any AI system to provide legal services, or making any changes to the AI system or the data upon which the AI system is trained that may affect the risk, functionality, or operation of our use or deployment of the AI system.

Suppliers must

- Do all things reasonable to assist us to assess the level of risk associated with the AI system to implement best practice technical controls, to detect fraudulent or unauthorised use;
- Ensure that the provision of AI services does not involve the use of restricted data without our express written consent and monitor, detect, mitigate, and report any biases, hallucinations, distortions, or vulnerabilities in the AI output;
- Give us permission to test, demonstrate, or pilot the AI system before deployment, at periods specified by us and promptly on request, so as to demonstrate compliance with their obligations and industry best practice; and

• Notify us about the use or reliance or proposed reliance on any third-party software in providing AI services and ensure that we have the right to use such software.

Suppliers must comply with all applicable data protection legislation and obtain all legally required consents and issue required notices in respect of any personal information contained within the training data and warrant that the AI system is fit for purpose, of satisfactory quality, and materially free from defects, and indemnify us against all loss or damage arising from claims brought by third parties.

3. LANDER & ROGERS

3.1 Overview of Lander & Rogers

Founded in 1946, Lander & Rogers is a leading Australian law firm, comprising approximately 600 people including 85 partners. We have grown organically, resulting in a highly cohesive firm sharing a strong work and client service ethic, as well as high staff and partner retention rates. We believe that legal services involve more than just the law – practical, commercial advice and exceptional client experience are equally important to our clients and to us. Our firm is global in its approach, but we remain fiercely independent and truly Australian. We work closely with international firms that do not have an Australian presence, and we are the exclusive Australian member of the largest global network of independent law firms, TerraLex. Consistent with our values and culture, we are strongly committed to pro bono & community work and supporting our environment.

3.2 Our commitments

Lander & Rogers is a signatory to the United Nations Global Compact, a voluntary framework for the development, implementation and disclosure of responsible business practices that consists of ten universally accepted principles in the areas of human rights, labour, environment and anti-corruption, listed in Annex 1. The framework is designed to hold the firm and our people, to account, ensuring our behaviours and objectives are aligned with our values and operate within legal and moral frameworks. Lander & Rogers aims to demonstrate the ten principles of the UN Global Compact in all areas of our business.

We are committed to the fair and equal treatment of all people. As a business, this means Lander & Rogers actively champions equal opportunity and the creation of a diverse workforce. We are also staunch advocates on environmental issues and responsible business practices and are committed to identifying, assessing and addressing the risk of modern slavery within our business, in all our dealings and in our supply chains. We strive to contribute to global efforts to eradicate all forms of modern slavery.

Lander & Rogers has an Innovate Reconciliation Action Plan setting out our actions promoting reconciliation and contributing to Australia's effort to close the gap between Aboriginal and Torres Strait Islander peoples and the wider community.

More information about Lander & Rogers and our commitments is available at <u>https://www.landers.com.au/about-us</u>.

Lander & Rogers expects our contractors, consultants, and suppliers to adopt the same high ethical compliance standards that we do.

4. WHISTLEBLOWING

Lander & Rogers' whistleblowing policy encourages the reporting of improper conduct, which includes any act or omission that is dishonest, fraudulent, or corrupt.

Suppliers, their staff or contractors or any other third party should feel free to raise any concerns, suspected or actual, regarding breach of this Supplier Code of Conduct to procurement@landers.com.au.

Concerns can also be raised anonymously and will be investigated and actioned/reported as appropriate.

5. MONITORING COMPLIANCE

It is within the sole discretion of Lander & Rogers to review and monitor compliance with this Supplier Code of Conduct.

From time to time, we may request evidence of compliance and/or an attestation of compliance with this Supplier Code of Conduct.

In the event of non-compliance with this Code of Conduct or upon our due diligence and findings that a supplier does not share the same values, Lander & Rogers reserves the right to terminate our business relationship with the supplier.

6. CONTACT DETAILS

To discuss any issues relating to this Supplier Code of Conduct, please contact procurement@landers.com.au.

Policy Owner	Chief Finance Officer
Date:	7 February 2025
Next Review:	7 February 2028

ANNEXURE A

The ten principles of the United Nations Global Compact

HUMAN RIGHTS

Principle 1:	Businesses should support and respect the protection of internationally proclaimed human rights; and
Principle 2:	Make sure that they are not complicit in human rights abuses.
LABOUR	
Principle 3:	Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
Principle 4:	The elimination of all forms of forced and compulsory labour;
Principle 5:	The effective abolition of child labour; and
Principle 6:	<i>The elimination of discrimination in respect of employment and occupation.</i>

ENVIRONMENT

- *Principle 7:* Businesses should support a precautionary approach to environmental challenges;
- *Principle 8: Undertake initiatives to promote greater environmental responsibility; and*
- *Principle 9: Encourage the development and diffusion of environmentally friendly technologies.*

ANTI-CORRUPTION

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.