



# Supplier Code of Conduct

## Document Number – ASM-STD-SUP-114

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### 1.0 Purpose

Stanwell Corporation Limited (**Stanwell**) recognises the importance of its procurement practices being transparent, responsible and held to the highest standards of integrity.

We are a major purchaser of a range of goods and services from suppliers that operate both in regional Queensland and the State as a whole. Because of the diversity of our procurement portfolio, we accept our responsibility extends beyond the initial purchase of the good and/or service. Our professional conduct and management of our supply chain is a major focus.

The purpose of this document is to clearly and unequivocally establish our expectations of our supply chain and the suppliers that provide their respective goods and services to Stanwell. This purpose is achieved through:

- (a) ensuring that each of our suppliers (i.e. any entity who does business with any company or division of Stanwell including any vendor or business partner) (a **Supplier**) adhere to the same ethical standards; and
- (b) prescribing a set of minimum standards for doing business with any Suppliers.

### 2.0 Scope

The Supplier Code of Conduct applies to conduct of all personnel engaged by and undertaking work on behalf of the Supplier in its business, regardless of whether they be casual, short-term or contracted workers or where they may be located.

You are expected to read and familiarise yourself with this Supplier Code of Conduct. Please contact the General Manager – Procurement & Supply for further information or if you have any questions you may have on the application of this Supplier Code of Conduct to you.

### 3.0 Our values

Stanwell buys goods and/or services from Suppliers in different markets and regions.

We do not adopt the same procurement method in all cases, preferring to instead adopt the approach best suited to each transaction.

Our values and behaviours guide our strategic decisions and daily behaviours. They influence how we engage with external stakeholders and the local communities in which we operate.

### 4.0 Compliance with legislation

In addition to any legislation mentioned elsewhere within this document, we expect our Suppliers to comply with all locally, State and national laws and regulations applicable to their

business.

### 5.0 Safety

At Stanwell, we are committed to achieving Zero Harm Today where we act to keep all of our people safe and well, every day.

We are committed to undertaking our business in a manner that prevents injury or occupational illness to employees, visitors, contractors and the public who may be impacted by our work activities. We encourage best practice in health and safety management and process safety and drive a continuous improvement culture.

The health and safety of people in our workplaces is supported and reinforced in our values and behaviours.

To maintain our commitment to health and safety, we expect our Suppliers to:

- actively promote workplace health and safety including protecting and supporting their employees' physical, emotional and mental health and wellbeing;
- have in place appropriate workplace policies, safe operating procedures, focussed training and personal protective equipment (**PPE**);
- operate and maintain a safety management system in which potential health and safety hazards are reported, assessed, communicated, reviewed and controlled; and
- abide by all safety processes, procedure standards and instructions on Stanwell sites, including Alcohol and Drug Testing and minimum PPE standards.

Our corporate values and behaviours are:

We care by:

- focusing on our health, safety and wellbeing;
- looking after each other, the environment and our community;
- being inclusive and communicating openly; and
- respecting and helping each other grow and succeed.

We adapt by:

- embracing change and new ideas;
- working together and sharing learnings; and
- encouraging questions and different perspectives.

We deliver by:

- keeping our commitments and trusting each other;
- making responsible commercial decisions; and
- owning our actions and outcomes.

## 6.0 Corporate governance and ethics

Stanwell is committed to upholding the highest levels of corporate governance and ethics.

Stanwell's Code of Conduct sets out the standards and expectations for the way in which we work with each other and our stakeholders at Stanwell. It includes a set of guiding principles to guide decisions relating to compliance with regulations and laws; treating people respectfully and ethically; managing conflicts of interest; maintaining accurate and proper records; providing equal employment opportunities; and supporting Stanwell's Whistle-blower Protection Policy.

We also expect our Suppliers to behave to the highest levels of corporate governance and ethical standards. We expect our Suppliers will align their behaviours, in their business dealings with us, to our Code of Conduct.

## 7.0 Fair treatment

Stanwell is committed to developing and fostering a culture in which diversity is valued. We aim to provide a workplace that is free of discrimination, harassment and bullying.

We expect our Suppliers will interact in their business dealings with us with respect, trust, dignity and fairness. The Supplier should support the principles and rights under the United National Global Compact, the UN Universal Declaration of Human Rights and the 1998 International Labour Organisation Declaration on Fundamental Principles and Rights at Work.

## 8.0 Human rights, modern slavery and fair labour

### 8.1 Modern Slavery

The *Modern Slavery Act 2018* requires all Australian entities or foreign entities carrying on business in Australia that have a consolidated revenue of \$100 million or more, to publicly report on, amongst other things, risks of modern slavery in their operations and supply chains.

Stanwell is committed to assessing and addressing the risks of modern slavery practices in its operations and supply chain. Stanwell defines modern slavery in accordance with the definition provided in the *Modern Slavery Act 2018*, that is including:

- (a) slavery;
- (b) servitude;
- (c) forced labour;
- (d) deceptive recruiting;
- (e) forced marriage;
- (f) debt bondage;
- (g) trafficking in persons; and
- (h) the worst forms of child labour.

### 8.2 Child labour

The Supplier must not employ children under the legal age of employment in any country or local jurisdiction. If the minimum age of employment is not defined, it will be 15 years of age. Workers under the age of 18 must only perform work in accordance with legal requirements (e.g. with regards to working time, wages and working conditions) and subject to any requirement regarding education or training.

### 8.3 Forced labour

- (a) The Supplier must not use any form of forced, bonded or involuntary labour. All labour must be voluntary.
- (b) Workers must be allowed to maintain control over their identification documents (eg passports, work permits or any other personal legal documents).
- (c) The Supplier must ensure that workers do not pay fees or make any payment or incur any loans or other liabilities connected to obtaining employment throughout the hiring process and the employment period. If any such fee or payment is found to have been paid by a worker, the Supplier will pay an amount equal to the fee or payment to the worker. The Supplier must be responsible for payment of all fees and expenses (eg licences and levies) relating to workers, where legally required.
- (d) Punishment and/or mental or physical coercion are prohibited. Disciplinary policies and procedures must be clearly defined and communicated to the workers.

## 8.4 Conditions of employment, compensation and working hours

- (a) The Supplier must ensure that employment contracts and conditions are provided in terms and in a language clearly understood by the workers.
- (b) The Supplier must comply with all applicable laws and mandatory industry standards regarding maximum working hours, overtime, fatigue management/days of rest, wages and benefits.
- (c) The Supplier must pay workers in a timely manner and clearly convey the basis on which workers are being paid.
- (d) Deductions from wages as a disciplinary measure must not be allowed, if not legally permitted and even where legally permitted, should be minimised.

## 8.5 Freedom of association and collective bargaining

- (a) The workers of the Supplier must be free to join or not to join a union/employee representation of their choice, free from threat or intimidation.
- (b) The Supplier recognises and respect the right to collectively bargain in accordance with applicable laws.

## 8.6 Diversity

- (a) The Supplier must promote an inclusive work environment that values the diversity of its workers.
- (b) The Supplier must not discriminate or tolerate discrimination with respect to gender, race, religion, age, disability, sexual orientation, national origin or any other characteristic protected under applicable laws.

## 9.0 Supplier diversity policies

Stanwell supports and encourages supplier diversity by aligning with the Queensland Government's Ethical Supplier Threshold, as described in the *Queensland Procurement Policy 2023*.

Our Suppliers are encouraged to develop individual diversity policies, programs and business initiatives to support supplier diversity.

## 10.0 Employee wellbeing

### 10.1 Harassment

The Supplier must ensure that workers are free from any harassment or untoward interactions with co-workers. Stanwell does not support any business which facilitates harassment of any kind and expects its Suppliers to take proactive steps to ensure workers safety.

### 10.2 Domestic and family violence

Stanwell is committed to ending domestic and family violence. We expect Suppliers to support Stanwell's commitment by implementing appropriate initiatives within their businesses. It is expected that Suppliers have a zero-tolerance approach to domestic and family violence or have a workplace domestic and family violence policy in place.

### 10.3 Quality, Secure local jobs

Stanwell values Suppliers who provide quality, secure local jobs.

These jobs provide:

- (a) Employment where people live;

- (b) Permanency of employment;
- (c) Certainty of hours;
- (d) Fair wages and conditions;
- (e) Superannuation and workers compensation; and
- (f) Genuine respect for the rights of workers to collectively bargain.

## 11.0 Environmental management

Environmental sustainability at Stanwell means that when making business decisions, there is due consideration of environmental consequences and opportunities, in conjunction with social and commercial imperatives.

Stanwell's commitment to the environment is to conduct our business in a manner that secures our long-term future while also balancing our environmental and social right to operate.

We have a culture of compliance and continuous environmental improvement.

Our activities within Stanwell's Environmental Sustainability Policy include, but are not limited to, reducing pollution, proactively managing environmental risks and complying with laws and regulations across our operational sites.

We believe it takes a group effort and commitment to have a long-lasting and positive impact. Therefore, we expect our Suppliers to support Stanwell's commitment to environmental sustainability and to look for opportunities to improve environmental outcomes.

Potential opportunities for Suppliers to improve environmental outcomes include, but are not limited to:

- (a) Minimising waste and packaging;
- (b) Increasing recycling;
- (c) Reducing and/or offsetting carbon emissions;
- (d) Using solar or other renewable energy sources wherever possible; and
- (e) Reducing the use of hazardous and toxic substances, and ensuring their correct disposal.

## 12.0 Bribery and corruption

The Supplier must comply with all national and international anti-bribery regulations as well as applicable anti-corruption laws, regulations and standards.

The Supplier must not (either directly or indirectly) offer or promise to provide anything of value to improperly influence an official or act to secure improper advantage in order to obtain or retain business.

## 13.0 Trade regulation, fair competition and insider trading

- (a) The Supplier must comply with all applicable trade and import regulations including sanctions and embargoes that apply to their activities.
- (b) The Supplier must comply with applicable competition and anti-trust laws.
- (c) The Supplier must comply with all applicable laws and regulations concerning insider trading and must not engage in insider trading to the extent the Supplier gains access to non-public information about Stanwell, its customers or business partners.

## 14.0 Money laundering & financial records

The Supplier must comply with applicable laws and regulations designed to combat money laundering activities. The Supplier must maintain financial records and reports according to international laws and regulations.

## 15.0 Conflicts of interest

A conflict of interest arises when an individual has a private/personal interest which could appear to influence their decisions. Such conflict of interest situations include a relationship by blood or marriage, partnership, business relationship business partnership or investment. The Supplier must disclose any actual or potential conflict of interest with Stanwell or its personnel of which the Supplier is or becomes aware.

## 16.0 Responsible sourcing of goods and materials

The Supplier must:

- (a) ensure its procurement and sourcing practices are ethical and in accordance with human rights and law;
- (b) develop due diligence policies and management systems in order to identify relevant risks in its supply chains;
- (c) undertake regular due diligence on the goods and materials in the Supplier's supply chains to determine whether goods and materials are sourced from high risk areas associated with child or forced labour, human rights violations and conflict, or are associated with health and safety risks and environmental risks; and
- (d) take appropriate steps to mitigate and manage identified risks.

## 17.0 Required standards of goods and services

The Supplier must ensure that all goods and services provided:

- (a) Meet the relevant compliance requirements and the Australian Standard where specified;
- (b) In the absence of an Australian Standard an international standard may be applied;
- (c) For building and construction this also includes conforming products and materials.

## 18.0 Inappropriate supply market behaviours

Stanwell encourages Suppliers to show innovation and act competitively, however, the Supplier must not:

- (a) Act in a manner which involves a misuse of their market power;
- (b) Act in a manner which would be otherwise improper;
- (c) Enter collusive arrangements; and
- (d) Procure or sell dumped goods.

## 19.0 Animal welfare

Suppliers who are in charge of animals used to produce food and beverages provided to Stanwell must ensure compliance with relevant animal welfare legislation (including the *Animal Care and Protection Act 2001* (Qld)), related codes, standards, and guidelines at minimum, regarding those animals.

## 20.0 Sub-contractor payment terms

The Supplier must offer payment terms to sub-contractors that are no less favourable than those provided to the Supplier by Stanwell (unless otherwise mutually agreed with the sub-contractor). This includes meeting project bank account requirements under the *Building Industry Fairness Act 2017 (QLD)* where applicable.

## 21.0 Business continuity planning

The Supplier must be prepared for any disruptions of its business (e.g. natural disasters, terrorism, software viruses, illness, pandemics, infectious diseases, worker shortages). This preparedness especially includes

business continuity and disaster recovery plans to protect both employees as well as the environment as far as possible from the effects of possible disasters that arise within the domain of operations.

## 22.0 Business partner dialogue

The Supplier will encourage its own suppliers to adhere to this Supplier Code of Conduct as part of fulfilling their contractual obligations with the Supplier.

## 23.0 Data protection and disclosure of information

The Supplier must adhere to relevant data protection and security laws and to respective regulations, in particular with regard to personal data of customers, consumers, employees and shareholders. The Supplier must comply with all said requirements when personal data is collected, processed, transmitted used or retained.

The Supplier must safeguard and make only appropriate use of confidential information. The Supplier must not disclose any information that is not known to the general public.

The Supplier must accurately record information regarding its business activities, supply chains, workers, health and safety, and environmental practices.

## 24.0 Compliance with the Supplier Code of Conduct

- (a) Stanwell reserves the right, upon reasonable notice, to check compliance with the requirements of the Supplier Code of Conduct. Stanwell encourages its Suppliers to implement their own binding guidelines for ethical behaviour.
- (b) Any breach of the obligations in this Supplier Code of Conduct by the Supplier is considered a breach by the Supplier of any contract between Stanwell and the Supplier.

## 25.0 Compliance reporting

Stanwell values business transparency as it fosters trust, strengthens relationships and enhances business efficiencies. Business transparency is achieved through the provision of timely, accurate and value-adding business reports and processes.

To ensure business transparency and compliance requirements are met, we expect our Suppliers to have in place processes to report:

- economic performance and on the completeness and accuracy of financial and business records;
- non-compliance with any relevant local, State and national laws and regulations including, but not limited to: environment, health and safety and social; and
- cyber security threats and/or breaches to confidential information for the supplier engaged product or service.

## 26.0 Innovation

Stanwell recognises the need for innovation in response to a rapidly changing market environment. Innovation to deliver business efficiency is an important component of our business strategy.

We recognise that collaboration with our Suppliers and customers is essential to make this happen. We encourage our Suppliers to discuss with Stanwell, ways of reducing the cost of doing business through more efficient administrative or operational processes.

## 27.0 Reporting concerns and reportable conduct

Stanwell is committed to a culture of transparency. We encourage employees, contractors, Suppliers and other service providers, such as consultants, to speak up about concerns or reportable conduct.

All information received will be managed securely and confidentially. Any concerns raised should be directed to:

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Whistle-blower Protection Officer

Phone: 1800 671 902

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