

Supplier Code of Conduct and Ethics

1 Purpose

- 1.1 The purpose of this Supplier Code of Conduct (Code) is to articulate our expectations and requirements for all suppliers (including subcontractors) providing goods and services to AL-KO International Pty Limited (**AL-KO, we, us, our**).
- 1.2 All of our suppliers have a responsibility to monitor compliance with this Code, to notify us of any breaches and take reasonable steps to address, remedy and prevent repetition of any breach or possible breach of this Code.
- 1.3 We reserve the right to undertake due diligence and risk assessments to verify compliance with our Code and expect our suppliers to cooperate and provide supporting evidence as we may reasonably require to monitor and review compliance.

2 Your conduct

- 2.1 We seek to work with businesses whose values match our own. We require all our suppliers to comply with all applicable laws and to meet the standards and principles set out in this Code across all areas of their business. Compliance with such laws, standards and principles is a material consideration for us in assessing every aspect of our supplier relationships.

3 Use of this Code

- 3.1 All new and existing suppliers are required to comply with this Code and demonstrate their commitment to doing so.
- 3.2 Suppliers who engage subcontractors when providing goods or services to us must make them aware of our Code.
- 3.3 Compliance with our Code will be used as part of our supplier evaluation, selection and contract management process.
- 3.4 When a supplier does not meet our requirements, corrective action plans will be established and monitored for progress. We will terminate the relationship with suppliers that repeatedly and knowingly violate our Code.
- 3.5 Our suppliers are expected to adopt a management system to carry out the responsibilities in this Code. The management system must be designed to:
 - (1) ensure executive level accountability for compliance;
 - (2) identify and mitigate operational risks;
 - (3) facilitate continual improvement; and
 - (4) permit whistleblowing.

4 Ethics, anti-bribery and corruption

Our suppliers must:

- (1) comply with all applicable laws relating to the prevention of bribery, corruption, fraud, tax evasion or similar or related activities.
- (2) seek to identify and report any conflicts of interest, be it competing personal or professional interests. Our suppliers must avoid even the appearance of conflicts of interest in their work with us.
- (3) maintain a policy reasonably assuring that any goods they provide to us, or goods they use in providing services to us, do not benefit groups that commit human rights abuses, and must provide due diligence materials to us upon request.
- (4) not directly or indirectly in trade activities or include in their supply chain any goods or services sourced from sanctioned persons, countries or organisations in accordance with all sanctions laws we must comply, including local or regional sanctions as mandated by the government for the relevant jurisdiction applicable to us.
- (5) respect intellectual property rights and act in a manner protecting intellectual property rights.
- (6) protect the privacy of personal information of everyone with whom they do business.

5 Diversity and inclusion

- (1) Our suppliers must comply with all applicable anti-discrimination laws within their own workplace, including in recruitment practices.
- (2) Without limiting the above, our suppliers must not discriminate based on race, colour, age, sex, gender, gender identity, gender expression, sexual orientation, marital status, ethnicity, national origin, caste, disability, genetic information, medical condition, pregnancy, religion, political affiliation or union membership.

6 Health and safety

- (1) Our suppliers must comply with all applicable health and safety laws and aim to create a safe working environment for its employees and anyone else affected by their businesses.
- (2) Our suppliers will provide workers with ready access to clean toilet facilities, potable water, and sanitary food preparation, storage and eating facilities. If our suppliers provide workers with residential facilities, those facilities will be clean and safe, with adequate personal space, entry and exit privileges, emergency egresses, heating, ventilation and hot water for bathing.

7 Labour

- (1) Our suppliers must not use or permit any form of forced, bonded or indentured labour. Suppliers must not unreasonably restrict workers' freedom to move into, out of or at working facilities.

- (2) Our suppliers must ensure that workers under the age of 18 do not perform work that is likely to jeopardise their health or safety, including night shifts and overtime.
- (3) Our suppliers must not permit harassment, abuse, corporal punishment or inhumane treatment.
- (4) Our supplier's workers must be permitted to associate freely, bargain collectively and seek representation in accordance with local laws.
- (5) Suppliers must not provide us with, or use on any of our site, any products listed in the U.S. Department of Labor's List of Goods Produced by Child Labor or Forced Labor as updated from time to time.

8 Human Rights

- (1) Our suppliers, whether directly or through their supply chain, must comply with all applicable human rights related laws in respect of their employees.
- (2) Our suppliers must notify us if they, or their subcontractors or suppliers, have been convicted, had a notice served upon them, or an order made against them for infringement of modern slavery laws anywhere in the world.
- (3) They must conduct their business activities in a manner which respects human rights and must not hold another person in slavery or servitude, employ, engage or otherwise use forced or compulsory labour, trafficked labour or child labour.
- (4) They must have in place adequate procedures to identify, prevent, mitigate and account for modern slavery and other human rights impacts in their operations and supply chains.

9 Environmental and Sustainability

Our suppliers must:

- (1) comply with all applicable environmental laws and continually strive to improve their sustainability performance, focusing on reduction (as appropriate) of waste, carbon emissions, water and natural resources consumption.
- (2) work to reduce consumption of resources, track and seek to improve energy efficiency, energy consumption and greenhouse gas emissions.
- (3) monitor, treat and reduce hazardous air emissions, wastewater and waste generated from its operations.

10 Questions & Concerns

If you have a question or concern about proper conduct or the content of this Code, you should immediately raise the issue with Australia New Zealand ALKO Sourcing Manager or refer to the whistleblowing process set out in Compliance Reporting and Anti-Retaliation Policy, **Annexure A** and **B**.