

Supplier Code of Conduct

Pitt & Sherry (Operations) Pty Ltd

Purpose

pitt&sherry is committed to ethical, sustainable and socially responsible procurement. This 'Supplier Code of Conduct' describes our minimum expectations regarding the conduct of our suppliers in the areas of alignment with our values, and our policies and procedures.

Scope

This Code of Conduct applies to all suppliers of pitt&sherry (including its subsidiary companies).

A reference to "supplier" in this Code includes all individuals and organisations (including their subsidiary companies) involved in the supply of goods or services to pitt&sherry.

We expect all suppliers to communicate this Code to their supply chain and subcontractors who support them in supplying goods or services to us, so that they understand and comply with the Code.

We expect all existing and new suppliers to comply with the Code.

Supplier Expectations

We expect our suppliers to align with the principles outlined in the UN Global Compact (<https://www.unglobalcompact.org/what-is-gc/mission/principles>) and meet or exceed the standards outlined in this Code within their own operations and throughout their supply chains:

Alignment with Our Values

Our values are:

- Integrity
- Courage
- Creativity
- Relationships
- Accountability
- Sustainability.

We care about the well-being of the communities we serve. Our above values guide how we conduct our business and how we approach our relationships, whether it be with our clients, employees, communities or our shareholders.

We expect our suppliers to align with our values and be willing to drive continuous improvement in their processes, to enable us to meet our corporate responsibility commitments.

**Pitt & Sherry
(Operations) Pty Ltd**
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Located nationally —
Melbourne
Sydney
Brisbane
Hobart
Launceston
Newcastle
Devonport



Ethical Business Practices

We strive to ensure the highest standards of conduct and ethical behaviour throughout all of our business practices. We are committed to operating within the laws of any jurisdiction in which we do business, and in a way that is consistent with our values. Suppliers are expected to promote the use of legitimate business practices.

pitt&sherry expect suppliers to:

- Comply with all anti-bribery, anti-corruption and anti-money laundering laws
- Not engage in fraudulent, corrupt or collusive activities in breach of laws and regulations, whether directly or indirectly
- Fully comply with obligations under all applicable State and Commonwealth laws and demonstrate compliance
- Demonstrate policies and practices are in place to prevent bribery, deceptive, dishonest, corrupt or inappropriate behaviours
- Abide by laws and rules for fair competition
- Keep honest, accurate and complete records of all business transactions in accordance with acceptable accounting principles and practices
- Provide workers with an avenue to raise concerns regarding any misconduct or improper state of affair or circumstances (including unethical, illegal, corrupt or other inappropriate conduct) without being subject to victimisation, harassment or discriminatory treatment
- Proactively manage data security and protect intellectual property
- Not improperly use or disclose any private, confidential or commercially sensitive information in its possession relating to or in connection with their dealings with us
- Assess and monitor their supply chains to minimise human rights, labour, environment and bribery or corruption risks.

Human Rights and Labour Practices

We are committed to responsible business practices and respect human rights. We believe that all workers in the supply chain deserve to be treated with dignity and respect. Suppliers are expected to provide a fair and ethical workplace which supports human rights, integrating appropriate policies and practices into their business.

pitt&sherry expect suppliers to:

- Provide goods and services in a manner consistent with all applicable human rights obligations
- Not engage in any modern slavery practices including human trafficking, deceptive recruiting, restricting workers' freedom of movement, servitude, debt bondage, forced marriage, forced labour, child labour, organ trafficking and other slavery-like practices
- Take all reasonable steps to ensure modern slavery practices are not taking place in their operations, supply chain or by their third-party business partners
- Ensure that their workers have freedom of association and collective bargaining
- Comply with all applicable laws with respect to minimum employment conditions, superannuation and workers' compensation insurance
- Not discriminate against any worker based on any status or attribute protected by law, in hiring and other employment practices
- Commit to a workplace free from workplace bullying, harassment, victimisation and abuse.

Environmental Sustainability

We are committed to promoting environmental sustainability. Suppliers are expected to comply with all relevant environmental laws and regulations for their business. We expect our suppliers to minimise the environmental impact of their operations; this includes identifying and the mitigating the environmental risks posed by their business.

pitt&sherry expect suppliers to:

- Fully comply with obligations under all applicable state and national laws and regulations on environmental management and reporting and demonstrate compliance
- Support the principles of sustainable development within our communities and promote waste elimination, material recycling and improving energy efficiency
- Demonstrate processes are in place to assess and manage environmental performance across their operations and supply chains (i.e. considering the long-term impact on the environment around good and services).

Health and Safety

We promote a culture which focuses on health and safety, and by implementing management systems and practices we seek to minimise adverse impacts arising from our operations or service. We expect our suppliers to provide a healthy and safe work environment and integrate sound health and safety management practices.

pitt&sherry expect suppliers to:

- Provide a safe environment and systems of work aimed at the achievement of zero harm
- Comply with all applicable laws relating to workplace health and safety
- Manage occupational health and safety hazards
- Provide workers with job-related training and consult with employees in relation to the provision of information and training
- Maintain healthy, safe and secure working conditions and equipment
- Ensure that health, safety and the environment are incorporated as essential components for all undertakings
- Provide an environment which encourages their employees to speak up in relation to safety matters.

Corporate Governance

We strive for good corporate governance and are committed to fulfilling corporate governance obligations and responsibilities in the best interests of the company and its shareholders, and other stakeholders. Suppliers are expected to maintain sound governance and administration processes. Suppliers should develop and maintain a process to identify, manage and control relevant risks associated with their operations and supply chain to ensure compliance with this Code and the applicable laws.

pitt&sherry expect suppliers to:

- Declare to us any situation that raises an actual, potential or perceived conflict of interested related to or in connection with your dealing with us
- Avoid financial, business or other relationships which may compromise the performance of your obligations under your business arrangement with us
- Not offer our personnel gifts or benefits, either directly or indirectly, and offers of hospitality will be limited to token offers of basic courtesy
- Perform periodic evaluations of their operations and those of their subcontractors
- Cooperate openly and honestly with any audit we may conduct on your compliance with this Code and any applicable laws.

Monitoring and Compliance

Suppliers are expected to develop appropriate documentation and processes to demonstrate that they share the values, principles and standards expressed in this Code and with respect to all legal requirements.

We may:

- Request to review such documentation and processes
- Perform any assessments or reviews on supplier practice as part of a contentious improvement plan.

Suppliers are required to monitor their compliance with this Code and notify us of any investigation into non-compliance by authorities and of any material breaches of the Code. Suppliers are expected to report any suspected violations of regulations and laws applicable to this Code either to a senior manager at pitt&sherry or to our external reporting whistleblower service “Stopline”, via email - pitt&sherry@stopline.com.au. Suppliers are expected to take reasonable steps to prevent, address and remedy any breaches of this Code.

Upon our reasonable request, we may require suppliers to provide us with evidence and certification of their compliance with this Code.

pitt&sherry will continually review its policies and procedures relating to this Code to assess relevance and supplier compliance.

Non-Compliance

pitt&sherry reserves the right to disqualify any potential supplier or discontinue business relationships with any current suppliers who have not complied with this Code and met our expectations.

Engage with Us

pitt&sherry understands that everything within this code will require continuous improvement from themselves, along with suppliers. Therefore, since meeting the requirements within this Code will be an ongoing process, we encourage openness and transparency about any gaps or challenges you might face.

Please feel free to contact info@pittsh.com.au to:

- Provide feedback, raise any concerns and seek clarifications or support regarding this Code
- Raise concerns about any suspected or actual breaches of this Code
- If you are finding it difficult to comply with this Code.