

Supplier Code of Conduct

Procurement

Monadelphous Group Limited

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i. Company Definition

This document applies to all subcontractors, vendors and business partners (herein referred to as Suppliers) to Monadelphous Group Limited (herein referred to as The Company).

ii. Purpose

This Supplier Code of Conduct sets out our minimum expectations of the conduct of our Suppliers in the areas of: Health and Safety, Environment, Labour and Human Rights, Business Integrity and Ethics. As one of our valued Suppliers, you should review this Code and ensure that your operations meet our requirements.

1 Supplying to Monadelphous

We seek relationships with Suppliers that are aligned with our core values and share our commitment to lawful business practice conducted to high standards of ethical behaviour.

Delivering on our Values

Monadelphous' core values are:

Safety and Wellbeing	We show concern and actively care for others. We always think and act safety.
Integrity	We are open and honest in what we say and what we do. We take responsibility for our work and action.
Achievement	We are passionate about achieving success for our customers, our partners and each other. We seek solutions, learn and continually improve.
Teamwork	We work as a team in a co-operative, supportive and friendly environment. We are open-minded and share our knowledge and achievements.
Loyalty	We develop long term relationships, earning the respect, trust and support of our customers, partners and each other. We are dependable, take ownership and work for the Company as our own.

2 Health and Safety

We are committed to the elimination of all work-related injuries and illnesses for all people associated with our activities. We believe that *The Safe Way is the Only Way*.

Suppliers are expected to:

- Support our commitment to *The Safe Way is the Only Way*, which obliges and authorises all personnel to stop work where they deem it to be unsafe to continue;
- provide and maintain safe systems of work where hazards and associated risks are identified and eliminated or controlled to as low as reasonably practicable;
- set health and safety targets, monitor performance and ensure learning and continual improvement;
- ensure all plant, equipment and materials are fit for use and maintained in a safe condition;
- provide competent supervision, education, instruction and information to all personnel;
- consult with and enable participation of employees regarding health and safety management;
- provide workers with clean working environments and sanitary facilities, including potable water, ventilation, clean bathrooms, accommodations and kitchens, if applicable;
- identify and comply with relevant legislation and industry requirements.

3 Labour and Human rights

We are committed to ensuring that all workers in our supply chain are treated fairly, ethically and with respect.

We will not tolerate forced or indentured labour in our supply chain, all labour must be voluntary. Suppliers must ensure that proper documentation and procedures are in place to manage the status of employees. This documentation should be consistent with the laws of the suppliers' country of operation, as well as laws on modern slavery and human trafficking.

Suppliers employment contracts should clearly state the terms of employment and be available in workers' native language. Suppliers should ensure that employees' freedom of movement is not restricted by the

withholding of travel and identification documents and/or the payment of recruitment fees and should allow employees to terminate employment with reasonable notice.

Suppliers must only employ workers who are the applicable minimal legal working age in the country of operation and maintain official, verifiable documents of all employee's ages.

In addition, Suppliers are expected to:

- comply with all laws in respect of the privacy of personal information;
- comply with applicable laws in respect of employment practices;
- protect workers from all forms of harassment, including bullying, coercion, discrimination, physical and verbal abuse;
- be an equal opportunity employer and eliminate work and employment practices that disadvantage certain groups of people;
- not discriminate against any worker on the basis of age, disability, ethnicity, gender, marital status, political affiliation, race, religion, sexual orientation, gender identity, union membership or any other status protected by law;
- if worker housing is provided, ensure it meets country of operation and safety standards;
- if workers are transported to the work location, provide appropriate return transportation.

4 Environment

We conduct our operations in an environmentally responsible way. We work to prevent or minimise the impact from our activities on the environment and in the communities in which we operate.

Suppliers are expected to:

- comply with relevant environmental legislation and industry requirements;
- ensure risks and opportunities which affect environmental performance are determined and addressed;
- commit to the reduction, and where possible, prevention of pollution;
- respect cultural heritage and the local communities in which we work;
- provide competent supervision, education, instruction and information to all personnel to assist in meeting environmental obligations.

5 Business integrity and ethics

We do not permit any form of bribery and corruption and have a “zero tolerance” approach to any form of bribery and corruption in the conduct of our activities. We are also committed to compliance with all applicable trade laws and sanctions regimes. We expect our suppliers to comply with all applicable national and international laws, regulations and restrictions, and to conduct business legally and ethically.

Suppliers are expected to:

- comply with all anti-bribery, anti-corruption and anti-money laundering laws;
- not engage in any fraudulent, corrupt or collusive activities or any bribery, including facilitation payments, bribing officials with gifts or other forms of entertainment and gifts;
- avoid any actual or apparent conflicts with the interests of Monadelphous;
- comply with all competition laws;
- comply with all applicable trade laws and sanctions; and
- maintain honest and accurate records of all financial transactions and information related to its business activities.

6 Benefits and working hours

We expect suppliers to comply with applicable regulatory requirements in providing compensation, benefits, holidays, and in outlining working and overtime hours. Suppliers should provide wages that meet industry standards and should ensure that all overtime hours are voluntary and compensated at a premium rate. Suppliers should also ensure that no illegal deductions are made to employee remuneration, and that wages are paid regularly and on time.

7 Compliance with the Code

Breaches of this Code of Conduct are considered seriously. You are expected to monitor your own compliance with this Code and take any necessary action to correct any deficiencies or breaches. We may request you to provide evidence of your compliance with the Code.

If you have any questions regarding this code of conduct or you wish to learn more of our Supplier expectations, please email Suppliercodeofconduct@monadel.com.au.

If you identify a potential breach of this Code, including a complaint made by a third party, you must immediately report it to us in accordance with our Whistleblower Policy (BMS-POL-094).

You may also report the issue to the Monadelphous Integrity Hotline, an external independent service provided by Deloitte. Reports to the Hotline can be made by:

Phone: Tollfree (within Australia) – 1800 952 477
Direct dial (for international dialling) – +61 3 9667 3570

Post: Monadelphous Integrity Hotline
Reply paid 12628 A'Beckett Street
Victoria 8006

Email: MonadelphousIntegrity@deloitte.com.au

Website: www.MonadelphousIntegrity.deloitte.com.au

Fax: +61 3 9691 8182

Monadelphous will address any grievance, issue or concern in a fair, objective and confidential manner.

Definitions

Term	Definition
Modern slavery	Modern Slavery includes any conduct failing within the definition of “modern slavery” in the Modern Slavery Act 2018 (Cth) and any forced labour, slavery, involuntary servitude, debt bondage, human trafficking, forced or servile marriage, the sale and exploitation of children and other slavery-like exploitation.