

## Supplier Code of Conduct

September 2024

### 1 Introduction

This Supplier Code of Conduct (**Code**) outlines our minimum expectations of suppliers providing goods and services to Freightways Group Limited and its subsidiaries (**Freightways, us, our** or **we**). We expect our suppliers to comply with all applicable laws and to meet the standards and principles set out in this **Code** in their business activities, operations, and their own supply chain.

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 their compliance.

All new and existing suppliers are required to comply with this Code and demonstrate their commitment to doing so. Suppliers who engage subcontractors when providing goods or services to us must ensure that this Code is communicated to them.

Compliance with this Code is a material consideration for us when we engage suppliers to procure goods and services and will be used as part of our supplier evaluation, selection and contract management process.

### 2 Business integrity

Suppliers are required to:

- (1) act ethically and with integrity at all times.
- (2) comply with all applicable laws relating to the prevention of bribery, corruption, fraud, tax evasion, money laundering, anti-competitive conduct or similar or related activities.
- (3) seek to identify and report to us any conflicts of interest, be it competing personal or professional interests. Our suppliers will avoid even the appearance of conflicts of interest in their work with us. Any conflicts of interest that cannot be avoided should be declared to us and managed appropriately.
- (4) in all dealings with us, not:
  - (a) engage directly or indirectly in trade activities with; or
  - (b) include in their supply chain any goods or services sourced from;  
  
sanctioned persons, countries or organisations; in accordance with all sanctions laws with which we must comply, including local or regional sanctions as mandated by the Government for the relevant jurisdictions applicable to us.

### 3 Intellectual property, privacy and confidentiality

Our suppliers must:

- (1) respect intellectual property rights and act in a manner protecting intellectual property rights.

- (2) protect the privacy of personal information of everyone with whom they do business and comply with all relevant privacy and data protection laws, cybersecurity laws and regulations.
- (3) implement security standards and procedures to ensure that personal information, confidential information and trade secrets are securely stored, disclosed only on a need-to-know basis, used only for permitted purposes and destroyed when no longer required.
- (4) safeguard personal information, confidential information and trade secrets to which they have access in connection with their provision of goods and/or services to us.

## **4 Labour rights, human rights and ethical sourcing**

We believe that all workers deserve to be treated with dignity and respect. Suppliers must:

- (1) comply with all applicable laws and regulations with respect to wages (including equal pay for equal work), benefits, resignation, superannuation, leave entitlements, working hours and insurance;
- (2) promote and maintain a workplace that is free from discrimination, bullying, harassment, victimisation or any other type of abuse.
- (3) not hold another person in slavery or servitude, employ, engage or otherwise use forced or compulsory labour, trafficked labour or child labour.
- (4) 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.
- (5) permit workers to associate freely and bargain collectively in accordance with local laws.
- (6) undertake checks to ensure that migrant workers have not:
  - (a) had to surrender their passports or other forms of original identity documents as a condition of employment; or
  - (b) paid fees to anyone to secure employment.
- (7) ensure that their workers have access to a grievance mechanism to report concerns regarding adverse modern slavery without fear of retaliation.
- (8) have in place adequate procedures to identify, prevent, mitigate and account for human rights impacts, including modern slavery, in their operations and supply chains.
- (9) maintain a policy reasonably assuring that any copper, steel, tin, lead, quartz, silicon, polysilicon, selenium, tellurium, arsenic, cadmium, aluminium, boron, gallium, indium and PVC in products supplied to us are not the result of modern slavery in either the extraction or processing stages of the aforementioned material, and must provide due diligence materials to us upon request.

## **5 Health and safety**

Health and safety is a fundamental component in the way we conduct our business. Our suppliers must:

- (1) comply with all applicable occupation health and safety (**OHS**) laws and regulations and regularly review and manage OHS hazards.
- (2) provide workers with job-related training and adequate personal protection equipment.
- (3) have appropriate emergency plans and response procedures in place.
- (4) comply with our work, health and safety procedures when visiting our sites.

## **6 Environmental sustainability**

In line with our commitment to operate sustainably and minimise our environmental impact, our suppliers must:

- (1) comply with all applicable environmental laws and continually strive to improve their sustainability performance including in relation to their supply chain, 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.
- (4) provide us with all reasonably necessary information to permit us to assess our scope 3 emissions and any other regulatory reporting obligation in relation to the impact of our supply chain on the environment and people.

## **7 Questions and concerns**

We expect our suppliers to monitor compliance with this Code and to let us know without delay if any breaches occur. We ask our suppliers to take reasonable steps to address, remedy and prevent any breach (or possible breaches) of this Code. This may include the development and implementation of a corrective action plan where necessary. We reserve the right to terminate the relationship with suppliers that repeatedly and knowingly violate our Code.

If you have a question or a concern, or would like to report a breach, or a suspected breach, of this Code please contact a Freightways General Manager or refer to our Protected Disclosures (Whistleblower) Policy on our [website](#). Concerns can also be reported externally through the EAP Services Whistleblower Hotline: 1800 726 474 (Australia) and 0800 327 669 (New Zealand).