

## REMONDIS Australia Pty Ltd

### Supplier Code of Conduct

#### A. Introduction

REMONDIS is committed to socially and environmentally responsible procurement and acknowledges this responsibility extends beyond our own operations and into our supply chains. REMONDIS have set high standards for the way we do business so our suppliers and customers have clear expectations about the way we conduct business.

#### B. Purpose and Scope

Our Supplier Code of Conduct (**Code**) sets out the minimum standards of behaviour we require of our suppliers. It is based on the Responsible Business Alliance Code of Conduct 7.0 effective 1 January 2021, which is a set of social, environmental and ethical industry standards which has been prepared with reference to international norms and standards including the ILO Declaration on Fundamental Principles and Rights at Work and the UN Universal Declaration of Human Rights.

Our Code is applicable to all of our suppliers. Suppliers are expected to not only comply with the Code but also implement this Code in their own supply chain.

We can provide guidance to suppliers on this Code when requested so that together we can strive for continual improvement in achieving our ethical procurement goals.

#### C. Contact

To raise a concern, the supplier can send an email to your relevant REMONDIS branch or a relevant REMONDIS manager or otherwise email [legaldept@remondis.com.au](mailto:legaldept@remondis.com.au).

REMONDIS will ensure that all compliance issues in the Code which are raised are quickly and fairly resolved at the proper level in REMONDIS

#### D. Overview

Our Code is made up of 5 sections as set out below:

- 1) Labour;
- 2) Health and Safety;
- 3) Environment;
- 4) Ethics; and
- 5) Supplier Compliance.

#### 1. Labour

Suppliers are committed to uphold human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees and any other type of worker. All suppliers must comply with applicable international and national laws and standards in relation to labour practices and human rights.

### REMONDIS Australia Pty Ltd

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| 1.1 | Voluntary Employment               | <p>Forced, bonded (including debt bondage) or indentured labour, slavery or trafficking of persons must not be used. This includes transporting, harbouring, recruiting, transferring or receiving persons by means of threat, force, coercion, deception, abduction or fraud for the purpose of labour or service. There shall be no unreasonable restrictions on workers' freedom of movement including unreasonable restrictions on entering or exiting company-provided facilities.</p> <p>All work must be voluntary, and employees shall be free to terminate their employment in accordance with established laws, regulations, and rules. Employees must not be required to surrender their government issued identification, passports or work permits as a condition of employment.</p> |
| 1.2 | Child Labour & Young Workers       | <p>The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. Child labour should not be used at any level of the supply chain.</p> <p>Young Workers, those under 18 years of age, must not perform work that is likely to jeopardise their health or safety, including night shifts and overtime. Work shall not interfere with their education or be harmful to their mental, social or moral development.</p>   |
| 1.3 | Working Hours, Wages and Benefits  | <p>Working hours are not to exceed the maximum set by law.</p> <p>Compensation paid to workers must comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws workers must be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure will not be permitted.</p> <p>Other deductions for accommodation, meals, transport, or personal protective equipment should not exceed minimum costs.</p>   |
| 1.4 | Humane Treatment                   | <p>There is to be no harsh or inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers – nor is there to be the threat of any such treatment.</p> <p>Disciplinary policies and procedures in support of these requirements must be clearly defined and communicated to workers.</p>   |
| 1.5 | Non-Discrimination/No n-Harassment | <p>Suppliers must be committed to a workplace free of harassment and unlawful discrimination. Suppliers must not engage in discrimination or harassment based on race, colour, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. Workers must be provided with reasonable accommodation for religious practices.</p>  |
| 1.6 | Freedom of Association             | <p>In conformance with local law, suppliers must respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities.</p> <p>Workers and/or their representatives must be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment.</p>  |

### REMONDIS Australia Pty Ltd

- 2. Health and Safety** Every employee has the right to work in a safe and healthy work environment. A safe and healthy work environment also enhances operational performance, increase morale and contributes to employee retention.
- All suppliers must make proper provision for the health and safety of their employees, contractors, visitors and those in the community who may be impacted by their operations. Suppliers must comply with applicable international and national laws and standards in relation to health and safety management.
- 2.1 Occupational Safety** Suppliers are required to ensure worker exposure to potential health and safety hazards (e.g. chemical or electrical hazards, fire, vehicles and fall hazards) are controlled through engineering and administrative controls, preventative maintenance and safe work procedures, personal protective equipment, and ongoing safety training and educational materials about risks and hazards.
- Procedures and process are to be in place to ensure the prevention, management, reporting, classification recording and tracking or occupational injury or illness. Procedures must encourage worker reporting, allow for provision of medical treatment, provide mechanisms for investigation and corrective action and facilitate the return of workers to work.
- Workers should be encouraged to raise health and safety concerns and be empowered to refuse to work in unsafe conditions.
- 2.2 Emergency Preparedness** Potential emergency situations and events are to be identified and assessed, and their impact minimised by implementing emergency plans and response procedures including emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans. Such plans and procedures will focus on minimising harm to life, the environment and property.
- 2.3 Welfare** Suppliers will keep their workplace at a comfortable temperature, have adequate lighting and be suitably ventilated. Work sites must be adequately clean and hygienic and have sanitary food, preparation, storage and eating facilities. There must be clean drinking water, clean toilet and washing facilities.
- 2.4 Communication & Training** Suppliers must provide workers with appropriate and regular workplace health and safety related information and training, including fire training, production safety, and correct use of protective equipment and first aid equipment. Clear safety warning signs, in the primary language of the workers will be displayed on relevant equipment and hazardous or toxic substances or objects.
- 3. Environmental** We recognise that sustainable economic development is dependent on environmental protection. As such we are committed to continual improvement in our performance, efficient use of natural resources and aspire towards zero harm to the environment.
- All suppliers must comply with applicable international and national laws and standards in relation to environmental management. Suppliers should consider a lifecycle approach to minimise the environmental impact of its products and services from creation to disposal.
- 3.1 Environmental Permits and Reporting** All required environmental permits and registrations are to be obtained, maintained and kept current and their operation and reporting requirements are to be followed.

### REMONDIS Australia Pty Ltd

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| 3.2       | Pollution Prevention and Resource Reduction     | <p>Suppliers are to ensure the efficient use of resources, and ensure that waste of all types, including water and energy, are reduced or eliminated at the source or by practices such as maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.</p> <p>Suppliers are to actively avoid causing environmental damage and/or negative environmental impact through their operations.</p>   |
| 3.3       | Hazardous Materials                             | <p>Chemicals and other materials posing a hazard if released to the environment are to be identified and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.</p> <p>Suppliers must regularly review the use of hazardous substances and substitute them with less hazardous alternatives where reasonably practicable.</p>  |
| 3.4       | Waste Management                                | <p>Suppliers will identify all potential waste streams and ensure processes are in place to manage these in line with the waste hierarchy and all applicable regulations.</p> <p>Wastewater generated from operations, industrial processes and sanitation facilities are to be characterised, monitored, controlled and treated as required prior to discharge or disposal.</p> <p>Suppliers will avoid undue and unnecessary use of materials and use recycled materials whenever appropriate.</p> <p>Suppliers shall adhere to all applicable laws and regulations and customer requirements regarding prohibition or restriction of specific substances including labelling for recycling and disposal.</p> |
| 3.5       | Air Emissions                                   | <p>Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterised, monitored, controlled and treated as required prior to discharge.</p>   |
| 3.6       | Energy Consumption and Greenhouse Gas Emissions | <p>Suppliers should look for cost effective methods to improve energy efficiency and to minimise their energy consumption and greenhouse gas emissions.</p>   |
| <b>4.</b> | <b>Ethics</b>                                   | <p>REMONDIS expects the highest standards of ethical conduct in all of its business dealings. Suppliers are expected to be ethical in every aspect of its business, including relationships, practices, sourcing and operations.</p>  |
| 4.1       | Business Integrity                              | <p>REMONDIS promotes integrity and ethics in all aspects of its activities and has zero tolerance for any form of corruption, extortion or embezzlement.</p> <p>Suppliers must also have a zero tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement.</p>  |
| 4.2       | No Improper Advantage                           | <p>Suppliers must not offer or accept bribes or other means of obtaining undue or improper advantage. This includes offering, authorising, giving or accepting anything of value to REMONDIS staff or representatives, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage.</p>  |

### REMONDIS Australia Pty Ltd

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| 4.3 | Disclosure of Information                  | Suppliers will disclose all information regarding their labour, health and safety, environment practices, business activities, structure, financial situation and performance in accordance with the applicable laws, regulations and prevailing industry practices. Falsification of records or misrepresentations of conditions or practices in the supply chain are unacceptable.  |
| 4.4 | Protection of Identity and Non-retaliation | Suppliers must maintain programs that ensure the confidentiality and protection of supplier and employee whistleblowing. Suppliers should have a clearly communicated process for their personnel to be able to raise any concerns without fear of retaliation or reprisal.   |
| 4.5 | Responsible Sourcing of Material           | Suppliers shall exercise due diligence on the source of materials and make their due diligence measures available to REMONDIS on request. Suppliers that manufacture, or where their main business is trading, electronic products must have a policy to reasonably assure that the tantalum, tin, tungsten and gold (known as 'conflict minerals') in the products does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country. |
| 4.6 | Compliance                                 | Suppliers must comply with all applicable local laws and regulations in all the countries in which they operate. Where this Code goes further than local standards, suppliers must adhere to the Code in a way that appropriately reflects the principles set out in this Code  |

- 5. Supplier Compliance** REMONDIS may verify the compliance of all its direct suppliers with the Code. Such verification may be conducted by way of a supplier self-evaluation or, where agreed, an audit by REMONDIS.

Compliance with the principles contained in the Code is a criteria that may be taken into consideration in REMONDIS' supplier selection process.

Whenever a situation of non-compliance is identified or a supplier finds it difficult to undertake appropriate measures, this should be reported and shared with the relevant representative of REMONDIS. As a preferred course of action, REMONDIS commits to work with suppliers to develop and implement a corrective action plan to improve the situation. Should there be instances of repeated non-conformance, REMONDIS will regard such conduct as a serious failure to adhere to this Code and reserves its rights accordingly.

- 6. Reporting Process** Suppliers are able to report any non-compliance in relation to this Code with a relevant representative of REMONDIS. Otherwise, Suppliers can also report unacceptable conduct under REMONDIS' Whistleblower Protection Policy either internally or externally (with the option of anonymity), using the following methods:

**Option 1: Internal Reporting Method**

**To an Eligible Recipient:** Report to a director, officer or senior manager of REMONDIS ("Eligible Recipients").

**To the Whistleblower Protection Officer:** Make an internal report directly to the Whistleblower Protection Officer (who is also an Eligible Recipient) to determine whether serious misconduct has occurred. This is an opportunity to clarify the incident, ask questions and determine whether the matter comes under the modern slavery legislation. At all times these discussions will remain confidential. Disclosure to the Whistleblower Protection Officer can be done as follows:

- o Email: [whistleblower@remondis.com.au](mailto:whistleblower@remondis.com.au);
- o Phone: 1300 107 188; or
- o Mail: CONFIDENTIAL: Whistleblower Protection Officer, REMONDIS Australia Pty Limited, Level 4, 163 O'Riordan Street, Mascot NSW 2020

**Option 2: External Reporting Method**

**To BDO Secure:** In the alternate, if a Supplier is not comfortable using internal reporting channels, a report can be made directly to REMONDIS' independent external whistleblowing service provider, **BDO Secure**, using any of the following methods:

- o Email: [securebdo@bdo.com.au](mailto:securebdo@bdo.com.au);
- o Phone: 1300 408 955 between 7am and 7pm.
- o Website: The BDO Secure online portal is accessible at <https://www.bdo.com.au/bdosecure>.