



Supplier Code of Conduct

August 2025

Version 1

The Wormald Supplier Code of Conduct

Quick Reference Guide

At Wormald we seek to treat our suppliers fairly and to act with integrity when we engage them. We expect all suppliers to adhere to the Supplier Code of Conduct (SCC).

Wormald commits to the following and expects the same of its suppliers:

	<p>Health and Safety Everyone should go home safe and healthy after every shift, every day. We expect our suppliers to prioritise safety in the same manner.</p>
	<p>Business Integrity We choose to work with suppliers who act with integrity. We are committed to acting ethically and expect our suppliers to demonstrate the same commitment to business integrity.</p>
	<p>Respect for Others and the Environment Human Rights We believe in treating people fairly, with dignity, respect, and care. We expect our suppliers to uphold these principles in their interactions as well.</p> <p>Natural Environment We are committed to the responsible use of our shared natural resources and to decarbonising our operations. We expect our suppliers to share this commitment to environmental responsibility.</p>
	<p>Local Community and Indigenous Engagement We aim to employ from, procure from, and build capacity within host communities. We expect our suppliers to proactively support their host communities in a similar manner.</p>
	<p>Effective Due Diligence We believe in knowing our suppliers. We work with suppliers who provide the requested information that is timely and accurate and who take risk appropriate steps to know their own suppliers.</p> <p>Reporting violations and raising concerns. We foster a culture of transparency and encourage employees, contractors, suppliers, and other stakeholders to speak up about their issues and concerns without fear of intimidation or retaliation.</p>

Supplier Code of Conduct - Delivering on our Commitments

At Wormald, every choice we make must reflect genuine care and concern for our stakeholders – employees, communities, partners, and the planet. We seek to do what is right every day and be considerate of everyone with whom we interact. We are dedicated to embodying our values of care, courage, and curiosity, ensuring that we act with integrity and consideration for all stakeholders, every day.

Our purpose is to find better ways to provide the materials our client needs, and our people are at the heart of bringing this to life. Through our procurement activities, we aim to create sustainable value in partnership with our suppliers. We prioritise developing long-term relationships with suppliers based on mutual benefit, with the aim to not only meet business demand, but to develop innovative solutions for our most complex challenges.

We seek to develop lasting relationships with, and create opportunities for, people and communities. We avoid or mitigate adverse impacts from our work, and respect diverse cultures and connections to lands and waters.

Our suppliers play a vital role in helping us deliver on these commitments by enabling us to source our products and services responsibly. **We expect our suppliers to share our commitment to ethical and compliant conduct.**

Our expectations towards suppliers are set out in this **SCC** – comprising provisions on **health and safety, business integrity, respect for others and the environment, as well as our expectations of suppliers during due diligence activities.**

Wormald's Commitment to Suppliers

Wormald employees and contractors are bound by the Ethical Sourcing Policy. This means we seek to treat our suppliers fairly and to act with integrity when we engage them.

Wormald:

- Does not ask our suppliers to act in ways that put them in breach of the SCC.
- Pays suppliers for services rendered and products supplied in a timely manner and according to the terms set out in our agreements with them.
- Takes risk-based steps to promote our suppliers' understanding of our SCC expectations.

Who is a supplier of Wormald?

Suppliers provide Wormald with goods and services. This includes contractual arrangements we may have with affiliates, subsidiaries, and intermediaries of direct suppliers.

Where and to whom does SCC apply?

The SCC applies globally to all Wormald suppliers.

The impact of laws and regulations?

Suppliers are expected to comply with laws and regulations in the jurisdiction in which they operate. The conduct provisions set out in this SCC are additional requirements and do not replace such laws and regulations. Where local laws and regulations set standards that are weaker than the conduct provisions in the SCC, we expect suppliers to apply the higher standard.

The impact of contractual obligations?

Suppliers are expected to adhere to the conduct provisions of the SCC in addition to any other obligations set out in contracts and other ancillary agreements.

Seeking advice on the SCC?

If you have questions regarding the SCC or wish to find out more about our expectations of our suppliers, please email Wormald Procurements - wormaldprocurements@wormald.com.au

Supplier Compliance

Wormald expects all suppliers to adhere to the SCC.

Failure to comply with the SCC may result in Wormald electing to not work with, or discontinue collaboration with, suppliers who do not meet our expectations. Where appropriate, suppliers will be given the opportunity to improve their degree of compliance to certain provisions of the SCC.

The SCC conduct provisions

The conduct provisions in the SCC are organised according to four themes:



Health and Safety

Our expectations regarding worker health and safety.



Business Integrity

Our expectations regarding responsible business conduct.



Respect for Others and the Environment

Our expectations regarding human rights, environmental rights and obligations, and community development in host and Indigenous communities.



Effective Due Diligence

Our expectations regarding suppliers' cooperation during and after due diligence activities.



1. Health and Safety

We commit to everyone going home safe and healthy after every shift, every day. We expect our suppliers to prioritise safety in the same manner.

We expect our suppliers to:

- 1.1 Provide a safe and healthy working environment for employees, communities, contractors, and subcontractors including provision of appropriate personal protective equipment and training to use such equipment.
- 1.2 Take all practical and reasonable measures and comply with all applicable health, safety, and environmental (HSE) requirements and laws to eliminate workplace fatalities, injuries, and disease.
- 1.3 Ensure worker housing, if provided, complies with legal requirements, is clean, safe, and structurally sound, meets the basic needs of the workforce, respects workers' dignity and privacy, and where required accommodates diverse needs including accessibility options.
- 1.4 Promptly report all safety incidents, conduct thorough investigations, and seek to learn and continuously improve.
- 1.5 Handle and transport hazardous chemicals and dangerous materials safely and in accordance with applicable laws.
- 1.6 Always adhere to equipment safety specifications.
- 1.7 Exercise due diligence in the transport supply chain by ensuring activities comply with the Heavy Vehicle National Legislation (HVNL) and Chain of Responsibility (CoR) for transportation of goods. This includes implementing systems, procedures, and training to manage risks associated with their tasks.



2. Business Integrity

We choose to work with suppliers who act with integrity. We are committed to acting ethically and expect our suppliers to demonstrate the same commitment to business integrity.

We expect our suppliers to:

- 2.1 Comply with all applicable laws and regulations.
- 2.2 Maintain accurate financial and business records, including invoicing, in accordance with all applicable legal and regulatory requirements and accepted accounting practices.
- 2.3 Avoid conflicts of interest with their responsibilities towards Wormald and declare to Wormald any business interest held in Wormald and any business partners, either personally or through close relations such as family members.
Supplier declaration of business interest obligations does not extend to the holding of publicly traded Wormald shares unless Wormald explicitly advises otherwise. If in doubt, please contact Wormald to seek guidance.
- 2.4 Refrain from offering payments, gifts, or donations with the purpose of creating an unfair advantage during procurement activity or any other business deals.
- 2.5 Comply with applicable sanctions and trade control laws and regulations.
- 2.6 Refrain from bribery or corruption of any form, including demanding or making facilitation payments.
- 2.7 Refrain from attempting to induce or inducing a public official to provide an unfair advantage.
- 2.8 Report promptly to Wormald any solicitations for bribes from public officials or other parties.
- 2.9 Comply with applicable competition/anti-trust laws, and refrain from sharing non-public pricing information with competitors or making any form of agreement to segment or divide markets.
- 2.10 Respect Wormald's intellectual property rights.
- 2.11 Manage cyber security risks when in possession of private employee information, contractor information, stakeholder information, or proprietary information to perform contracted goods or services.
- 2.12 Refrain from retaliating against employees or contractors that elect to report to Wormald or relevant government agencies, any observed or suspected contraventions of the SCC.
- 2.13 Maintain policies and risk management practices appropriate to the size and complexity of their operations to effectively manage business integrity risks.
- 2.14 Maintain speak up or grievance procedures appropriate to the size and complexity of their operations to ensure observed or suspected misconduct which may be reported by their employees or contractors, effectively and without fear of intimidation or retaliation.

What is bribery and corruption?

A bribe is an offer of payment for something you are not entitled to.

Transparency International defines corruption as abuse of entrusted power for personal gain. Bribery is a specific form of corruption and occurs when someone directly or indirectly offers, promises, gives, demands, or receives anything of value to inappropriately influence an outcome or receive an undue benefit.

What is Wormald's policy on facilitation payments?

A facilitation payment is an offer of payment for something you are entitled to.

This may include a modest payment to expedite the granting of some government licence or getting quicker access to public goods like electricity or water supply services.

Wormald's Ethical Sourcing Policy as well as the SCC, prohibit bribery and facilitation payments.



3. Respect for Others and the Environment

Human rights

We commit to treating people fairly, with dignity, respect, and care and we do not tolerate discrimination or harassment. We expect our suppliers to uphold these principles in their interactions as well.

Wormald respects internationally recognised human rights including those set out in the International Bill of Human Rights which includes the *Universal Declaration of Human Rights (UDHR)* and *International Covenants on Economic, Social and Cultural Rights and Civil and Political Rights (ICESCR)*.

We expect our suppliers to:

- 3.1 Work to implement core international business and human rights standards, including the United Nations Guiding Principles on Business and Human Rights.
- 3.2 Refrain from using any form of modern slavery.
- 3.3 Refrain from employing children or anyone under the minimum age in their operations.
- 3.4 Adhere to applicable laws for young workers (such as trainees, graduates, apprentices) to only perform supervised, safe, and decent work that does not interfere with their education.
- 3.5 Include labour and human rights expectations in their contracts with their third parties.
- 3.6 Respect the rights of workers to participate in freedom of association and/or collective bargaining activities.
- 3.7 Provide fair remuneration and working conditions (including reasonable working hours, overtime, breaks, and no retention of original identity documents) for workers in accordance with applicable laws or collective bargaining agreements and provide all workers with written contracts in languages they are capable of understanding.
- 3.8 Take measures appropriate to the nature and context of their business to conduct risk based human rights due diligence on their supply chain.
- 3.9 Promote equity, diversity and inclusion within their workforce and actively foster a culture of respect and dignity for all individuals, regardless of race, ethnicity, gender, sexual orientation, disability, religion, or any other characteristic protected by law.
- 3.10 Working conditions are to be safe and hygienic.
- 3.11 Regular employment is provided. The regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.
- 3.12 No harsh / inhumane treatment allowed. Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

Modern slavery is a violation of an individual's dignity and human rights and refers to situations of serious exploitation where coercion, threats or deception are used to exploit victims and undermine or deprive an individual of his or her freedom. Modern slavery is an umbrella term that includes the crimes of slavery, servitude, forced labour, debt bondage, deceptive recruiting for labour or services, trafficking in persons, forced marriage and the worst forms of child labour.

Please read more about Wormald's commitment to address modern slavery in our annual statement:

[Modern Slavery Statement](#)

If suppliers cause or contribute to an adverse impact on human rights in their business activities and supply chain, we expect that they will provide for, or cooperate in, processes to enable an appropriate remedy. Where relevant, Wormald collaborates with suppliers and others to support remedy of adverse human rights impacts.

The natural environment

We commit to the responsible use of our shared natural resources and to decarbonise our operations. We expect our suppliers to share this commitment to environmental responsibility.

We expect our suppliers to:

- 3.11 Ensure compliance with applicable environmental laws and regulation.
- 3.12 Ensure environmentally responsible disposal of hazardous material in accordance with applicable laws.
- 3.13 Measure, manage, and report environmental data in accordance with applicable laws and regulations.
- 3.14 Take measures appropriate to the nature of their business to:
 - 3.14.1 Ensure appropriate management systems are in place to understand the life cycle of their products.
 - 3.14.2 Assess and avoid, minimise, or manage any impact they may have on biodiversity, ecosystems, and communities' use of natural resources.
 - 3.14.3 Assess and manage any waste and pollution (including air, water, soil) that may result from their business activities.
 - 3.14.4 Conserve water, promote water quality, and use marine resources sustainably.
 - 3.14.5 Promote the use of sustainably certified products, fostering circularity by encouraging recycling and re-use when conducting business activities.

Local Community and Indigenous Engagement

Wormald supports community engagement initiatives aimed at employing, procuring from, and building capacity within areas and communities where it operates. We expect our suppliers to proactively support their host communities in a similar manner.

We expect our suppliers to:

- 3.15 Comply with any applicable local and Indigenous procurement laws.
- 3.16 Understand and protect cultural heritage.
- 3.17 Report to Wormald as soon as known any instances where their activity may harm or have harmed cultural heritage sites or objects as well as any adverse impacts on the surrounding community.
- 3.18. Respect internationally recognised rights of Indigenous Peoples (including their cultural heritage), including those in the *UN Declaration on the Rights of Indigenous Peoples (UNDRIP)*. This includes consulting with Indigenous Peoples about activities that may affect them.
- 3.19 Foster, where practically and commercially possible, sustainable development in local and Indigenous communities by:
 - 3.19.1 Employing individuals who reside in the local and Indigenous community.
 - 3.19.2 Engaging suppliers who proactively support the local and Indigenous communities.
 - 3.19.3 Establishing or participating in community programs that foster, encourage and/or contribute to positive social, environmental and/or economic development — such as health and wellbeing, education, and learning and economic empowerment — that better prepare local and Indigenous communities to participate in ways that matter most to them.
 - 3.19.4 Providing culturally appropriate grievance mechanisms that are accessible and trusted for use by local and Indigenous Peoples and reporting back to Wormald if there are any concerns or potential impacts on host communities or Indigenous Peoples.

Wormald seeks to support local and Indigenous community business as much as possible through the development of respectful relationships and the application of transparent and responsible local procurement strategies. We work with host communities and other partners to deliver locally driven programs that reflect community priorities and deliver broad-based community benefits.



4. Effective Due Diligence

We commit to knowing our suppliers. We work with suppliers who provide information that is timely, accurate and relevant, and take risk-appropriate steps to know their own suppliers.

We expect our suppliers to:

- 4.1 Provide timely and accurate responses to Wormald due diligence questionnaires and other information requests. Allow access for audits and inspections where required.
- 4.2 Provide complete and accurate beneficial ownership information.
- 4.3 Adhere to agreed mitigation measures following due diligence assessments.
- 4.4 Provide appropriate training to their employees and contractors on complying with the SCC.
- 4.5 Maintain a program of work to understand the risks associated with their third parties, that is appropriate to the size and complexity of their operations.
- 4.6 Share with Wormald, upon request, their steps to understand the source of materials in their supply chains, any identified business integrity, human rights and environmental risks and the steps taken to mitigate any identified risks.

We expect suppliers who are in possession of personal data relating to Wormald employees and contractors, or Wormald's proprietary information, to perform a contracted product or service to:

- 4.7 Maintain a risk management program or programs to ensure data privacy and cyber security risks are adequately managed in their organisation.
- 4.8 Share with Wormald, upon request, documentary evidence of risk management programs to manage data privacy and cyber security risks.

Wormald seeks to align with the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.

Reporting Violations and Raising Concerns

We are committed to a culture of transparency and encourage employees, contractors, suppliers, and other stakeholders to speak up about their issues and concerns without fear of retaliation.

We strongly encourage suppliers who suspect or observe non-adherence to the **SCC in its dealings with Wormald** to report their concerns to Wormald.

To report concerns **confidentially or anonymously** suppliers may contact:

- Their Wormald relationship owner personally or in writing, or
- Wormald's Procurement Risk department using wormaldprocurements@wormald.com.au.

Wormald will not tolerate victimisation of those that elect to report abuse or suspected violations of the SCC.

References:

- ❖ Chain of Responsibility (CoR)
- ❖ Heavy Vehicle National Legislation (HVNL)
- ❖ International Covenants on Economic, Social and Cultural Rights and Civil and Political Rights (ICESCR).
- ❖ OECD Guidelines for Multinational Enterprises on Responsible Business Conduct
- ❖ Universal Declaration of Human Rights (UDHR)
- ❖ UN Declaration on the Rights of Indigenous Peoples (UNDRIP)

Supplier Acknowledgement Form

We kindly ask that you confirm that you have received and read a copy of the Supplier Code of Conduct (SCC). We understand that this document outlines important policies and procedures that are integral to the operations and conduct whilst dealing with Wormald.

It is imperative that you always comply with the Supplier Code of Conduct (SCC).

If you become aware of any breaches or possible breaches, please notify us immediately. You can contact us by writing, calling or emailing us at:

Wormald
PO Box 7241
Silverwater NSW 2128
T: 133 166
E: wormaldprocurements@wormald.com.au

By signing below, we confirm our understanding that adherence to these policies is essential for maintaining the standards and values of our organization as contained in the SCC, and to trade with Wormald.

Please complete this form and return to Wormald

Company Trading Name

Signature

Name (Please print)

Title

Date