

# Supplier Code of Conduct

# SUPPLIER CODE OF CONDUCT

## Introduction

Sanwa Pty Ltd (Sanwa) is committed to ethical, sustainable and socially responsible procurement. This Supplier Code of Conduct (Code) sets out the minimum standards of behaviour that Sanwa expects its suppliers to meet in the areas of labour and human rights, health and safety, environment, business integrity, cyber security and privacy, and supplier diversity. We expect our suppliers to work in accordance with this code of conduct.

Where suppliers breach this Code of Conduct, we will try to work with them to improve standards and employee welfare. However, we reserve the right to terminate an arrangement with any Supplier immediately for appropriate transgressions or where there is no willingness to make the necessary improvements. This code is mandatory and may be subject to audit. In order to achieve this Sanwa expects their suppliers to adopt an open and co-operative attitude to the monitoring activities that may be implemented.

### 1. Employment is freely chosen

- i. There is no forced or compulsory labour in any form, including bonded, trafficked, or prison labour.
- ii. Workers are not required to lodge deposits or their identity papers with their employer and are free to leave their employer after reasonable notice.

### 2. Freedom of association and the right to collective bargaining are respected

- i. Workers have the right to join or form trade unions of their own choosing and to bargain collectively, and the employer shall adopt an open attitude towards the activities of trade unions and their organisational activities.
- ii. Workers representatives shall not be discriminated against and have access to carry out their representative functions in the workplace.
- iii. Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of appropriate means for independent and free association and bargaining.

### 3. Working conditions are safe

- i. A safe and hygienic working environment shall be provided, and adequate steps shall be taken to prevent accidents and injury to health arising out of, or associated with, or occurring in the course of work, by minimizing, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- ii. Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
- iii. Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- iv. Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
- v. The company observing the code shall assign responsibility for health and safety to an appropriate management representative.

### 4. Sustainable Procurement

- i. SANWA wishes to share its commitment to ethical procurement with suppliers whose practices conform to applicable ethical standards.

## **5. Child labour shall not be used**

- i. There shall be no recruitment of child labour.
- ii. Companies shall develop or participate in and contribute to policies and programmes, which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.
- iii. Children and young persons under 16 shall not be employed in remotely hazardous conditions. Full training and personal protective gear will be provided at all times.

## **6. Living wages are paid**

- i. Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event, wages should always be enough to meet basic needs and to provide some discretionary income.
- ii. All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- iii. Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the express permission of the worker concerned. All disciplinary measures should be recorded.

## **7. Working hours are not excessive**

- i. Working hours comply with national laws and benchmark industry standards, whichever affords greater protection, and that workers shall not be required to work in excess of 48 hours per week and shall be provided with at least one day off for every 7 days period on average.
- ii. Overtime must be on a voluntary basis; it should not exceed 12 hours a week, shall not be demanded on a regular basis and shall always be compensated at a premium rate.

## **8. No discrimination is practised**

- i. There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

## **9. Regular employment is provided**

- i. To every extent possible, work performed must be on the basis of recognised employment relationship established through national law and practice.
- ii. Obligations to employees under labour or social security laws and regulations arising from 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.

## **10. No harsh or inhumane treatment is allowed**

- i. Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation are prohibited.

## **11. Legal requirements**

- i. SANWA is committed to full compliance with the laws and regulations in each location where SANWA conducts business, and will not knowingly operate in violation of any such law or regulation, and will not knowingly use suppliers who violate applicable laws and regulations

## **12. No bribery or corruption will be tolerated**

- i. The offering, paying, soliciting or accepting of bribes or kick-backs, is strictly prohibited. A bribe may involve giving or offering any form of gift, consideration, reward or an advantage to someone in business or government in order to obtain or retain a commercial advantage or to induce or reward the recipient for acting improperly or where it would be improper for the recipient to accept the benefit. Bribery can also take place where the offer or giving of a bribe is made by or through a third party, e.g. an agent, representative or intermediary.
- ii. Suppliers, representatives and their employees must comply with all applicable anti-bribery and corruption laws in Australia.
- iii. Suppliers and representatives must have in place anti-corruption and bribery procedures to prevent employees or persons associated with its business from committing offences of bribery or corruption. Suppliers and representatives will properly implement these procedures into their business and review them regularly to ensure that they are operating effectively.

## **13. Conflict of Interest**

Suppliers must avoid actual, potential or perceived conflicts of interest with SANWA 's workforce. If they occur, disclose them to the Signatory/General Manager, so that appropriate steps are taken to manage the conflict.

## **14. Environmental Considerations**

Sanwa is committed to promoting environmental responsibility.

- I. Suppliers are expected to minimise the environmental impact of their operations and maintain environmentally responsible policies and practices.
- II. Suppliers must comply with all applicable laws and regulations relating to the environment, including any management and reporting obligations. Suppliers are expected to manage the environmental impact of their operations by:
  - (a) ensuring the safe storage, transportation and disposal of hazardous substances including hazardous waste;
  - (b) maintaining policies and practices for the efficient use of energy, water and natural resource consumption; and
  - (c) maintaining policies and practices that reduce the risk of pollution, loss of biodiversity, deforestation, damage to ecosystems and greenhouse gas.

## **15. Intellectual Property & Fair Competition**

- I. Suppliers shall respect intellectual property rights of Sanwa and other third parties. Any transfer of technology and knowhow must be handled in a manner that protects intellectual property rights.
- II. Suppliers must conduct their business in full compliance with anti-trust and fair competition laws, and disclose information regarding business activities, structure, financial situation and performance in accordance with applicable laws.

## **16. Cybersecurity & Privacy**

- I. Sanwa expects our suppliers to work with us to protect Sanwa and our customers' data and networks. Suppliers must implement industry best practice or standard technical and organisational security measures, including managing and monitoring their supply chain to protect Sanwa and our

customers' data and networks from breaches. Suppliers must treat Sanwa and our customers' data as confidential information and only use that data for the purposes of providing services to Sanwa. If the Supplier becomes aware of a data or network breach then the Supplier must immediately notify Sanwa.

- II. Sanwa's privacy Policy outlines our privacy commitment and explains how we collect, use, disclose and protect our customers' personal information. Privacy is a non-negotiable part of how we work. Suppliers must apply adequate data privacy and security protection to protect the personal information of our customers and employees from unauthorised access, use and disclosure.
- III. Suppliers who collect, use, store or have access to our customers' personal information must have adequate processes and procedures in place to monitor compliance with applicable privacy laws and contractual privacy obligations with Sanwa.

## **17. Diversity**

Sanwa is committed to being a diverse and inclusive company and achieving greater diversity in our supply chain. Sanwa prefers suppliers who promote diversity in their supply chain.

### **Monitoring & Reporting**

Suppliers are expected to self-assess their compliance with the Code and take timely action to correct any deficiencies or breaches reported or identified by an audit, assessment, inspection, investigation or review. Suppliers are encouraged to raise any concerns, discuss and seek clarification accordingly to any elements of the Code with Sanwa. If requested by Sanwa, Suppliers should provide confirmation of their compliance with the Code, including appropriate evidence.

Any documents provided by a supplier should be sent to the signatory below / General Manager to review. The General Manager will report on the assessment of our supply chain to the board on an annual basis to identify any suppliers at risk of breach of our Code of Conduct.

### **Whistleblower Policy**

Sanwa has a Whistle blower (Protected Disclosure) Policy that allows (current and former) employees, volunteers, contractors and suppliers to raise concerns in a confidential manner.

Signed by



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David Roberts  
General Manager / Trading Director  
Sanwa Pty Ltd

On the 3<sup>rd</sup> of June 2025