

Partnering with our Suppliers

1 Purpose

The purpose of this policy is to provide guidance and standards for suppliers on how AllightSykes Pty Ltd and AllightPrimax ('the Company') likes to work and manage everyday business activities.

This policy is built on our values and represents commitment by the Company to uphold the highest ethical business practices and exceed requirements. The policy works in conjunction with legal requirements and where there is ambiguity the more stringent direction will apply. In addition, this policy supports our Company terms and conditions and where this is ambiguity the Company terms and conditions will prevail.

This policy applies to all suppliers regardless of status, size or location. Compliance of this policy requires each supplier to continually exercise good judgment in the decisions made on a daily basis.

2 Scope

This policy applies globally to all suppliers who interact with the Company. The Company Code of Conduct and Ethics ('the Code') works together with this policy and is available on our website for suppliers to review. The Code will help you understand the expectations we have of our people and will help you make decisions when interacting with the Company.

Where Australian standards are referred for Company entities operating in non-Australian jurisdictions:

- i. the local equivalent applies and compliance to the higher of local and Australian standards are required.
- ii. where no local equivalent exists, the Australian standard applies.

This policy is not intended to provide a detailed and exhaustive list of what to do in every aspect of work. Instead, it represents a broad framework that will help guide conduct and behaviour in the performance of duties and interactions with our Company.

3 Our Core Values

Our values are our compass, serving as the foundation for the way we operate with each other, our customers and our suppliers.

Safety

- we believe in the importance of workplace safety
- we will carry out our work and make decisions that ensure the health and safety of our staff and contractors, respect the environment, and comply with the regulations of countries we operate in
- we will identify ways to improve safety and commit to enact these changes

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Customer

- we commit to focusing on the needs of our customers
- we must understand our customers’ operations so we help their business become more productive
- we want our customers to choose us as a valued partner to their organisation

Collaboration

- we are focused on results and support each other to improve business outcomes for all parties
- we all understand our role in our organisation so that we can make a significant contribution in its success
- we take responsibility for actions, behaviours, decisions and outcomes and commit to what we say and we demonstrate honesty, integrity, respect and fairness always
- we have capable people, resourced facilities and dynamic suppliers that support our customers’ needs

Accountability

- we are accountable for our performance
- we challenge our internal practices and methods to improve quality, service and value
- we seek feedback on our performance and apply this feedback to our business activities
- we are constantly learning and continuously improving by applying appropriate technology and industry know-how

4 Responsibilities

4.1 All suppliers

It is expected that our suppliers will:

- ensure awareness and compliance with this policy within their businesses
- ensure that all confidential information obtained during the course of the relationship with our Company remains confidential and is not used for any other purpose other than for the Company’s benefit
- not breach any law or regulation of the country in which we work
- maintain high levels of health and safety standards and comply with all instructions and requirements of our Company when working on our sites
- comply with all applicable laws, regulations and other such standards regarding the manufacture and/or supply (as applicable) of any goods that they supply to our Company
- respond within a timely and accurate manner to requests received from our Company
- perform all activity with our Company honestly and ethically

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5 What you can expect from us

Our Company select suppliers based on their ability to meet safety and quality standards. In addition, we seek to enter into supply agreements where suppliers are able to offer ‘value add’ services to our processes, are dedicated to providing a high level of service and are motivated to building long term relationships beneficial for both organisations.

At AllightSykes we are committed to:

- creating and maintaining an environment for employees, contractors, customers, suppliers and visitors which is professional, safe and free of any form of unlawful or inappropriate behaviour
- a high level of customer service, providing outstanding value to all our customers

In all customer interaction and in all commercial and business dealings the Company upholds a high level of integrity and professionalism. The Company frequently complies with our customer’s standards and procedures and conversely encourages its customers to adopt our standards where appropriate.

This commitment is to be achieved by all people embracing Company values, policies and procedures. Our people have an obligation to ensure their personal conduct and behaviour is at all times professional and lawful and does not reflect adversely on the reputation of the Company.

In addition, our people must comply with the content and spirit of laws and regulations relevant to their work, act within specified authority applicable to their role and seek advice where they are uncertain about the application or interpretation of laws and regulations that may apply to them.

Where local law or practice permits a lower standard than set out in our Code of Conduct and Ethics, our people must nevertheless comply with the minimum standards set out in the Code.

6 How we will work together

When selecting suppliers, our Company is committed to dealing with fairness and integrity. It is important to AllightSykes that we partner with companies that hold similar values to our own and work in an ethical way. This is driven by our pursuit of continuous improvement and the desire to keep our employees, contractors and communities safe.

5.1 Health, Safety and Environment

The Company places a very high value on health, safety and environment and has developed an HSE Management System Framework to assist in compliance of all health, safety and environment laws and obligations. All people including suppliers have duties regarding safety under law and the Company expects that all suppliers comply with these obligations.

The Company is committed to the principle of equal opportunity in employment and to providing a workplace that is free from discrimination, harassment and bullying of any kind endeavouring to adhere to the laws relating to workplace equality in each country where we operate. The Company requires this same commitment from suppliers engaged with our Company.

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5.2 Requirements Prior to Entering into a Commitment

We take care in building strong relationships with reputable customers, suppliers, sub-contractors and other business partners. We collaborate with those that share our values, behave ethically and demonstrate a high standard of business conduct. We do not knowingly enter into relationships with those who operate in violation of applicable laws and regulations.

Prior to entering into a contract or commitment, our people must:

- conduct through due diligence including a review of the potential supplier’s reputation, ownership, health and safety requirements, qualifications and experience, creditworthiness, governance and business conduct frameworks
- engage the right people and departments of the Company to ensure all necessary approvals are received

Whilst working with existing suppliers, our people must:

- regularly monitor business partner performance and conduct
- ensure that suppliers comply with Modern Slavery requirements and do not use child or forced labour or use unacceptable punishment to discipline employees, regardless of whether such practices are permitted by local law
- regularly promote compliance with our policies and requirements, and report any non-compliance

In all interactions with competitors, customers and suppliers, the requirements and legislation of the Australian Competition and Consumer Commission (ACCC) and other anti-trust regulators as may be applicable applies, as well as local regulations.

5.3 Procure to Pay

Our Company procure to pay process is designed to facilitate the timely processing and payment to our suppliers. In order to ensure that we maintain efficient commercial relationships with suppliers, it is important that the following is adhered to:

- if a purchase order number is provided, it must be quoted on all invoices relating to the supply of the goods and/or services identified on the purchase order
- a separate invoice is to be submitted for each purchase order, with a clear reference to the purchase order number
- invoices are to be sent to the Accounts Payable email address (accountspay@allightsykes.com) in the first instance

Non-compliance with these requirements may lead to delays in payment, the return of the invoice for rectification and possibly non-payment.

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5.4 Confidentiality

Expectations of our suppliers regarding confidentiality form part of our Company terms and conditions.

5.5 Social Media and Use of Images

Social media is a powerful tool and provides with a flexible forum to engage with the community. Social media provides new opportunities for business, communication and collaboration, and new obligations for us to protect our people and reputation. Social media refers to websites and applications that let users create and share content and participate in social networking. It includes sites such as Facebook, YouTube, LinkedIn, Twitter, Instagram, blogs, wikis and newsgroups and it also includes any means through which you can digitally post text or images to someone else.

Approval must be given by our Company should a supplier wish to publish information about our Company on social media whether that is through using our Company name, image or work. Please provide submissions to marketing@allightsykes.com and your request will receive priority attention.

Where the Company is posting an image or video of a person, a Consent to Use Images and Video form must be completed.

5.6 Use of Company Logo and Brand

The AllightSykes Style Guide (the Guide) is available upon request. The Guide ensures our brand is used consistently across the Company and publicly.

The Guide outlines how the Company logo should be used including which colours are acceptable and the positioning of the logo.

Approval must be requested to use our Company logo.

5.7 Conflict of Interest

Whilst it is a matter relating to our people, we request support from our suppliers on conflict of interest.

Our people should not engage in activities that involve, or could appear to involve, a conflict between their personal interests and the interests of the Company. Such circumstances could compromise or appear to compromise that person’s ability to make impartial business decisions. Conflicts of interest can be actual, perceived or potential.

Our people must be objective and impartial and be seen to be so. A conflict of interest can involve:

- pecuniary interests i.e. financial gain or loss or other material benefits
- non-pecuniary interests i.e. favours, personal relationships and associations

It may not only be about the person’s own interests, it may include the interests of members of immediate family or relatives (where these interests are known), the interests of a person’s business partners or associates, or those of within that workplace or the interests of your friends.

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Examples of potential conflicts of interest include:

- holding business interests or employment outside of the Company
- affiliation or family link with customers, suppliers or contractors
- offering or accepting gifts or hospitality outside Company policy and/or failing to declare them
- pursuing Company business opportunities for personal gain
- influencing business decisions concerning a spouse, partner, family member or friend
- recruiting or approving the recruitment of a family member or supervising a relative and determining remuneration

If in any doubt about a conflict of interest, the matter should be referred to the Group Manager, Procurement at procurement@allightsykes.com.

5.8 Intellectual Property

Expectations of our suppliers regarding confidentiality form part of our Company terms and conditions.

5.9 Gifts, Discounts and Hospitality

To support the integrity of our Company, our people are required to exercise care when accepting or offering gifts, discounts or hospitality in the ordinary course of business.

Our people:

- must not offer or accept gifts, discounts or hospitality, even if in nominal in value, if the exchange may compromise – or appear to compromise – the exercise of objective and independent judgement
- may accept gifts to a value of \$50, only where these are token, seasonal or due to a special occasion or local custom
- may accept gifts over the value of \$50 however they are to be declared to their manager and determination will be made on how the gifts are disbursed
- may offer and accept occasional business-related meals and entertainment with business partners, where the value of these are in line with accepted local business practice and our internal protocols

7 Failure to comply

Suppliers are advised that failure to comply with these minimum standards may cause our Company to reassess its supply arrangements with non-compliant suppliers.

8 Asking Questions

Sometimes, because of varying factors, we are unsure of what might be the right thing to do. In these circumstances it is important that our suppliers seek information to resolve their questions. Should you have any queries please contact your local Purchasing Officer or email procurement@allightsykes.com.

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9 Raising Concerns

The Company encourages suppliers to raise concerns or queries they may have in a professional and conscientious manner.

All concerns and questions will be treated seriously, and confidentiality will be maintained to the highest degree possible.

If you have a concern that you would like to raise please email procurement@allightsykes.com or contact the Group Manager, Procurement on +61 (0)8 9302 7000.

10 Document Amendment History

Revision	Date	Description	Approved by
1	December 2020	First release	Group Manager, Procurement

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