

Supplier Code of Conduct

December 2022

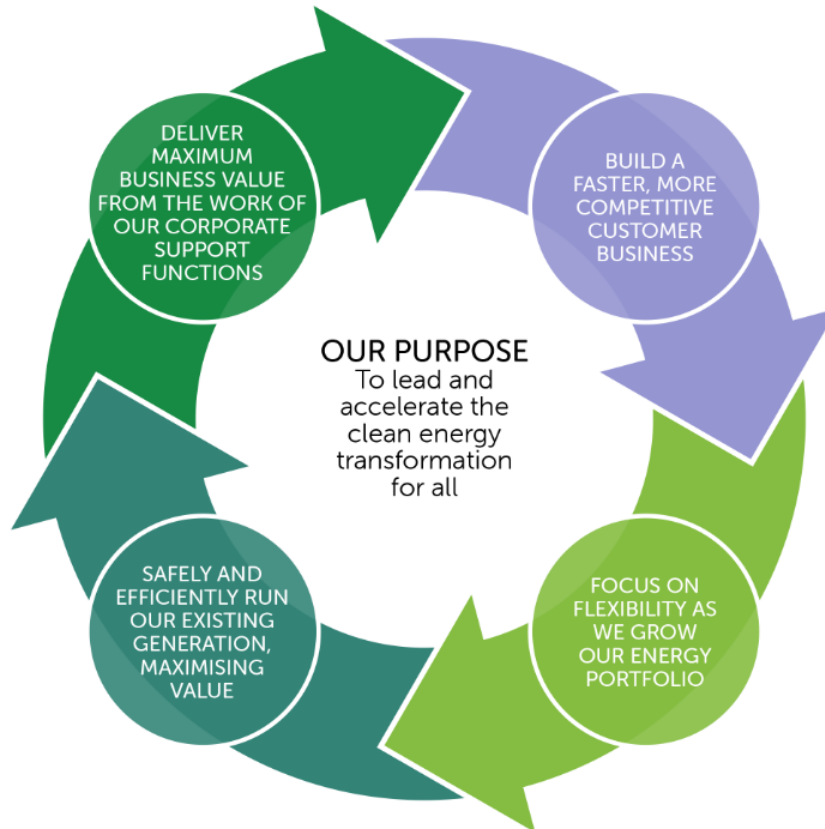
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EnergyAustralia
LIGHT THE WAY

Introduction

At EnergyAustralia our purpose is to lead and accelerate the clean energy transformation for all. Doing. Not just Dreaming.



At EnergyAustralia, we know that our customers want us to show leadership in energy – lighting the way in a manner that is right for all of us but doesn't leave anyone behind. That's why we're determined to lead by doing energy better.

It is important to us that the people and businesses we work with share our values, and this Supplier Code of Conduct (the *Code*) sets out our expectations for suppliers across 11 sustainability topics, representative of our responsible procurement practice. We are committed to working alongside our Suppliers to reach our expected standards. If there is a gap between a Supplier's approach and the *Code*, we will encourage the Supplier to formulate and implement an enhancement plan.

EnergyAustralia expects all our suppliers to read, understand and ensure that their business, suppliers and subcontractors meets these standards, understand and comply with this *Code*.

By supplier, EnergyAustralia means any entity that supplies goods or services to EnergyAustralia Holdings Limited, its wholly owned subsidiaries and controlled entities.

1. Legal Compliance

EnergyAustralia's reputation as a responsible energy provider is very much interlinked and built on compliance with the laws and regulations of the jurisdictions in which we operate and to include those of the countries where the transaction occurs.

Our Suppliers must:

- Comply with the laws and regulations of the jurisdictions in which they do business.
- Ensure products are compliant with the rules and regulations of the jurisdictions in which they are exported to.
- Maintain all business licenses and permits in accordance with applicable laws and regulations.
- Maintain procedures, processes and controls to keep updated with the applicable laws and regulations.
- Inform EnergyAustralia of any sanctions or other restrictions that it is subject to, and any risks arising out of conducting business with EnergyAustralia.

2. Business Ethics

At EnergyAustralia, we act with honesty and integrity and don't make or receive improper payments, benefits or gains. Suppliers must act ethically and be honest, transparent and trustworthy in all their dealings with others.

EnergyAustralia expects decisions throughout the supply chain to be made without perceived or actual conflicts of interest.

Bribery and Corruption

Suppliers must comply with applicable anti-bribery and anti-corruption laws, and must have adequate policies and procedures in place to monitor compliance with such laws.

EnergyAustralia strictly prohibits bribes, pay-offs, "facilitation payments" (payments to speed up routine actions), secret, unjustified or inflated commissions, kickbacks and any like payments or improper benefits, whether directly or indirectly, no matter how large or small in value.

This includes payments to or from any person (including public officials, foreign officials, foreign political parties or candidate for foreign political office) for the purpose of assisting a party to obtain or retain business for or with, or to direct business to, any person. This applies even if it is legal or common practice in a country.

EnergyAustralia will not tolerate bribery, corruption, and anti-competitive behaviour.

Responsible Sourcing of Minerals and Commodities

Suppliers are expected to exercise due diligence to reasonably assure that minerals and commodities in the products it manufacturers or trades, does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuse.

Suppliers shall not directly or indirectly support organisations and individuals associated with illegal activities, human rights abuses or terrorism.

IP and Fair Competition

Suppliers shall respect intellectual property rights of EnergyAustralia and other third parties. Any transfer of technology and knowhow must be handled in a manner that protects intellectual property rights.

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.

Sanctions and Trade Controls

Suppliers must comply with all applicable laws and regulations relating to sanctions, export, re-export, import and trade controls.

3. Cybersecurity

We recognise the rising risks of cyber threats and data privacy; and we are committed to taking actions to respect and protect our own data and the personal data of our customers.

Our Suppliers must:

- Accept they play a role in protecting EnergyAustralia's digital assets.
- Comply with all relevant data privacy and information security laws and regulations.
- Policies and processes in place to protect data privacy when any form of sensitive information is collected, stored, processed, transmitted, or shared.
- Compliance with EnergyAustralia's data security requirements.
- Compliance with EnergyAustralia's cybersecurity requirements, including appropriate measures to identify and manage potential risk areas.
- Data security incident detection and response protocols and a reporting mechanism to alert EnergyAustralia of security incidents involving EnergyAustralia's data.

4. Quality and Safety

We are committed to providing affordable and reliable energy, quality service and value to our customers. We have been able to deliver and achieve this with the support of our Suppliers.

Our expectations:

- Products and services provided to EnergyAustralia are of the highest standard of quality and safety and delivered in a timely manner.
- Product safety management systems and safety technologies in place and which evolve and improve over time.
- Information on product safety and quality is collected and used for continuous improvement.
- Integrity and transparency in managing quality and safety.
- Incident response protocols to provide alerts to EnergyAustralia of incidents or breaches that may affect the health and wellbeing of EnergyAustralia's customers and the reputation of EnergyAustralia.
- A product recall or rectification program in the event quality defects and safety issues are detected in supplied products.

5. Environmental Management

Reducing the impact our business has on the natural environment is a critical element of EnergyAustralia's operating model. We are committed to minimising the environmental impact of our value chain while taking active approaches to protect and preserve the natural environment.

Our Suppliers must:

- Conduct their business in accordance with all applicable environmental laws and regulations of the jurisdictions in which they operate.
- Adopt of direct measures to prevent and mitigate the environmental impact of the resources used and waste generated.
- Immediately cease work where there is a risk of environmental harm, notify us of any incidents which are notifiable under Environmental Law and provide us with an investigation report containing findings on the causes, preventative actions and implementation of investigation findings.

Our expectations:

- Clear identification and evaluation of the environmental aspects and associated risk of business activities.
- An environmental management system when significant environmental aspects are identified.
- Continuous monitoring of environmental performance and regular disclosure of the progress to EnergyAustralia and wider stakeholders.
- Actively seek opportunities to protect and restore biodiversity and natural capital.

6. Climate Change

Climate change is one of the most critical challenges our world is facing. We are progressively decarbonising our portfolio of power generating assets and evolving our business model to support our customers to improve energy efficiency. We are also seeking to reduce our Scope 3 greenhouse gas emissions and emissions from our upstream supply chains. As we transition to a low carbon economy, we are conscious the associated social impacts are minimised.

Our expectations:

- Supporting us to achieve our Climate Vision 2050 commitments.
- Measuring and disclosing greenhouse gas (GHG) emissions.
- A decarbonisation strategy with emissions reduction targets.
- Reductions in energy consumption and transition to clean energy sources.
- An impact assessment of their business on climate-related risks and the integration of climate action into their core business strategy.
- Action to adapt to the physical risk of climate change to ensure resilience.
- Exploring opportunities from climate change in the transition to a low-carbon economy

7. Community Relations

Our operations have a direct and indirect impact on the local communities in which we operate. Through open communication and engagement with local communities we strive to create a positive impact and to minimise our operational impact.

Our expectations:

- An established process to identify and mitigate risks imposed by products and operational activities on local communities.
- An open communication channel for community members to raise concerns and grievances.
- Actively support the communities in which business is conducted.
 - Outreach activities to improve community well-being, competency, and resilience.
 - Initiatives that serve the needs of socio-economically disadvantaged communities.
 - Support to small and medium, local and indigenous businesses and entrepreneurs to contribute to economic development and wealth.

8. Employee Health and Safety

Safeguarding the health, safety, and wellbeing of our employees is an EnergyAustralia core value. We will provide guidance and support to our Suppliers to create a healthy and safe workplace for their employees.

Our Suppliers must:

- Conduct business in accordance with all applicable health and safety laws and regulations of the jurisdiction in which they operate.
- Demonstrate a commitment to health and safety that includes:
 - Identification of significant workplace hazards and risks, and the implementation of prevention and mitigation measures.
 - Development of employee competencies to ensure work is done safely where personnel are engaged in activities that may pose a hazard to their safety or the safety of others e.g. manufacturing, working at heights, hazardous chemicals.
 - Provision of appropriate levels of competent supervision to ensure work is done safely.
 - Continuous monitoring of health and safety performance and a regular disclosure of the progress to EnergyAustralia and wider stakeholders.
 - Protocols to respond to safety emergencies and incidents that mitigate impacts.
 - Evidence of learning from incidents and making improvements.

9. Labour Practices and Human Rights

At EnergyAustralia we respect all internationally recognised human rights relevant to our operations and recognise the value of our employees, their families and the communities we operate in. As a responsible business we are committed to cascading this value to our operations and our Suppliers to provide a dignified, fair and equal workplace.

Our Suppliers must:

- Conduct business in accordance with all applicable labour and human rights laws and regulations of the jurisdictions in which they operate.
- Have zero tolerance in respect of any child labour and use of forced or compulsory labour at any point in their operations and upstream supply chains.
- Not employing people below the local legal minimum employment age.
- Ensuring that regular (i.e., normal contractual hours excluding overtime and meal breaks) and maximum working hours comply with requirements under relevant local legislation and applicable industrial instruments.
- Payment of a living wage or legally established minimum wage; with a similar obligation on Suppliers in the upstream supply chain.
- Alignment with ILO International Labour Standards.
- Respect of the right of workers to have freedom of association and collective bargaining powers, allowing employees to form or join professional unions and other organisations and professional bodies of their choice.

Our expectations:

- A confidential whistleblowing mechanism with appropriate procedures to investigate and address reported concerns and violations, with such mechanism including safeguards against retaliation.
- Access to a remedy for the Supplier's workers and those employed in their supply chains if they are exposed to a harm or violation of their human rights.

10. Diversity and Inclusion

EnergyAustralia operates in Australia with a workforce and customer base from a variety of different cultures and backgrounds. We are committed to providing an inclusive and diverse workplace allowing us to serve our diverse portfolio of customers.

Our Suppliers must:

- Conduct business in accordance with all applicable laws and regulations governing diversity and inclusion in the jurisdiction in which they operate.
- Zero tolerance of any form of discrimination, harassment or abuse.

Our expectations:

- Programmes to foster employee's health and well-being, including flexible working hours or work sharing, work from home arrangements, a family friendly workplace and paid parental leave.
- Non-discriminatory mechanisms and processes in recruitment, remuneration, and performance evaluation of employees.
- Setting ambitious target for women representation in operational, professional and leadership roles.

11. Supply Chain Management

As we cascade our commitments and expectations in doing business responsibly to our Suppliers, we encourage our Suppliers to do the same with their upstream Suppliers.

Our expectations:

- Monitoring and measuring performance of upstream Suppliers in accordance with the expectations set out in this Code.
- Transparency to provide fair and ethical treatment to upstream Suppliers.
- Robust programs for the management of upstream Suppliers including:
 - A Supplier's own code of conduct which incorporates values aligned with this Code.
 - Elements of responsible procurement, such as Supplier selection including sustainability criteria and risk ranking, Supplier sustainability audit and capacity building programs.
- Active education of procurement teams on the sustainability-related risks.
- Regular engagement with upstream Suppliers to enhance competency to manage risks.

12. EnergyAustralia's Whistleblowing Service

EnergyAustralia expects our suppliers to promote our values and high professional standards. To help meet this expectation, EnergyAustralia is committed to fostering an environment where our suppliers and sub-contractors can raise concerns about any actual or suspected breach of this code.

Suppliers, their current and former employees, and sub-contractors can raise concerns:

- Via an EnergyAustralia Executive or Head of a Business Unit
- In writing or verbally to Head of Group Internal Audit
 - Phone: 03 8628 1000
 - Mail: Level 19, 2 Melbourne Quarter, 697 Collins Street, Melbourne VIC 3008

If an employee or sub-contractor does not feel comfortable raising concerns through the channels above, a disclosure may be made to an independent third party via EnergyAustralia's whistleblower service:

- Call: 1800 500 965
- Email: faircall@kpmg.com.au
- Online form: <http://faircall.kpmg.com.au/>. This method does not permit two way communication unless the whistleblower provides contact details
- Mail: attn. FairCall Manager, PO Box H67, Australia Square 1213, Sydney
- Fax: (02) 9335 7466