

## 1 Purpose

At Aveo Group (Aveo), we endeavour to act as a good corporate citizen at all times. In doing so, we are committed to conducting our business with high standards of ethical behaviour. This Code of Conduct (Code) reflects the principles embraced by Aveo and expected of our suppliers and other providers.

This Code supports Aveo's core values and behaviours of Kindness, Collaboration, Care, Enthusiasm, Respect and Humility that ultimately underpins all provisions of this policy and the work at Aveo.

## 2 Scope

This Code applies to all suppliers of goods or services to Aveo. We expect that our suppliers, whether directly or through their supply chain, conduct themselves in accordance with the principles and standards in this Code and implement suitable management systems and processes.

We encourage our suppliers to exceed these minimum standards. We expect our suppliers to communicate this Code to their related entities, employees, suppliers and sub-contractors so that they are aware of, understand and comply with this Code.

## 3 Minimum standards

Our suppliers must:

### 3.1 Comply with laws

Comply with all local, national and other applicable laws and regulations of the jurisdictions in which the supplier operates. The standards outlined in this Code do not replace or alter any legal or regulatory obligations of suppliers.

### 3.2 Human rights

Conduct their business in a manner that respects and supports human rights consistent with the Universal Declaration of Human Rights, and comply with applicable human rights obligations.

### 3.3 Forced labour and inhuman treatment of workers

- (a) Not engage in or tolerate the use of forced, bonded, compulsory labour, slavery or human trafficking, the use or threat of physical or other punishment, or the physical, sexual or psychological abuse or inhumane treatment of workers.
- (b) Ensure that all activities do not contribute towards human exploitation, including human trafficking.
- (c) Respecting the privacy of workers and complying with all laws in the collection, use and protection of personal information.

### 3.4 Child labour

- (a) Comply with international and local obligations relating to the employment of children, including adhering to the higher of the minimum legal working age in their jurisdiction and the standards set by the International Labour Organisation.
- (b) Ensure children under the age of 18 are not employed in hazardous work or in work incompatible with their development.

### 3.5 Wages, benefits and working hours

- (a) Comply with applicable laws and regulations relating to remuneration and benefits, including minimum wages, overtime, superannuation, leave entitlements and other benefits, and ensure the timely payment of workers.
- (b) Provide workers with clear and understandable information about all relevant employment conditions before they enter employment.
- (c) Ensure working hours do not exceed the maximum hours per week required by applicable laws.

### 3.6 Freedom of association

- (a) Respect workers' rights, in accordance with applicable laws, to freedom of association, to establish and join or not join workers' associations, and to engage in lawful industrial activity, without interference, intimidation or harassment.

### 3.7 Anti-discrimination and harassment

- (b) Not engage in or tolerate direct and indirect discrimination based on gender, age, race, ethnicity, religion, marital status, sexual orientation, gender identity, pregnancy, disability, union membership or political affiliation, or any other status protected by applicable laws.
- (c) Provide and support a workplace free from bullying, harassment, victimisation and abuse, whether physical, sexual, verbal or psychological.

### 3.8 Health and safety

- (a) Comply with applicable workplace and product health and safety laws and respect workers' rights to refuse to perform work that is unsafe.
- (b) Provide a safe and hygienic environment for workers and third parties, by identifying and managing risks, providing appropriate equipment and resources, and ensuring access to facilities and amenities. Where accommodation is provided to workers, maintain a safe and hygienic environment that meets the basic needs of those workers, including access to clean toilet facilities, clean drinking water and, where appropriate, sanitary facilities for food storage and preparation.
- (c) Ensure its employees, contractors or other person under the supplier's direction or control entering an Aveo site where Aveo customers and employees are present, must be vaccinated against COVID-19 (double dose) by 15 December 2021 unless they hold an exemption recorded by law. This also includes obtaining any periodic vaccination boosters shots which are recommended by Australian government health advice and any direction of Aveo Group from time to time.

### 3.9 Environmental compliance

- (a) Comply with applicable environmental laws, regulations and standards and obtain, maintain and comply with necessary permits or approvals.
- (b) Actively manage the environmental impact of their operations, including by maximising the efficient use of energy, water and resources, minimising waste, and reducing the risk of pollution, deforestation and greenhouse gas emissions.

### 3.10 Political Donations

- (a) Not make any political donation on behalf of Aveo in any country (directly or indirectly), no matter how small or insignificant.

### 3.11 Ethical business practices

- (a) Act and conduct their business in a fair, ethical, transparent and professional manner, in a way that respects and supports the protection of human rights.
- (b) Not engage in fraud, bribery, “facilitation payments” (small payments made to secure or speed up routine actions), kickbacks, secret commissions or corrupt conduct whether directly or indirectly, and comply with applicable anti-bribery, anti-corruption, anti-money laundering, and counter-terrorism financing laws and regulations.
- (c) Not offer or receive improper gifts or other benefits that may influence judgement or affect the outcome of business dealings.
- (d) Not engage in or tolerate association with any criminal organisations or illegal activity.
- (e) Comply with international and applicable local laws and regulations relating to sanctions, export or import and trade controls.
- (f) Develop, maintain and implement policies consistent with this Code and maintain adequate records and systems to ensure compliance with this Code.

### 3.12 Employee training

- (a) Provide workers with training to perform their duties and comply with this Code.

## 4 Monitoring and compliance

Our suppliers must monitor their compliance with this Code and promptly notify us of any significant breaches, allegations of non-compliance or investigation into non-compliance by authorities. Suppliers must take all reasonable steps to address, remedy and prevent any further breaches.

We reserve the right to review compliance with this Code and require our suppliers to cooperate and provide information we may reasonably require to perform such a review. In some circumstances, we may require our suppliers to complete an annual declaration which confirms their compliance with this Code.

If a supplier, or another party in its supply chain, is unable to, or fails to, comply with this Code, Aveo will discuss this issue with the supplier and may require the supplier to take such steps as Aveo considers necessary to address the impact of, and remediate, the non-compliance, or in some cases Aveo may terminate the relevant supplier agreement.

## 5 Supplier Onboarding

Aveo is committed to engaging with suppliers and contractors who meet all the requirements set out in this document however we are now using external applications to support us in the onboarding process.

### a) Ethixbase

Ethixbase is an application that will be used to screen vendor risk for Modern Slavery, Anti-Bribery & Corruption and IT Security related matters. The responses provided will be used to determine if we engage with the suppliers and contractors moving forward. Ethixbase will then run a check on companies on a daily basis and flag any risk findings back to Aveo. These will be reviewed by Aveo and if deemed to be a high risk to the business, action may be taken to cease trading.

### b) Rapid Global

Rapid Global is an application that will be used to onboard the Ethixbase approved suppliers / contractors and will be used only for companies providing onsite services. This will concentrate on all types of insurances, Work Health Safety and Inductions. If any insurances fall due and no new policy is provided, then the supplier / contractor will be suspended from working on any Aveo site until all required documents are provided.

Further details will be provided in the supplier & contractors handbook.

## 6 Application of this Code

If a supplier's contractual arrangements contain more detailed requirements in respect of any principles covered in this Code, this Code is intended to supplement (and not override) those contractual obligations.

## 7 Raising a concern

Suppliers can raise concerns about any actual or suspected breach of this Code through any of the contact points below:

- Directly with their supplier relationship point of contact; or
- By email to [companysecretarial@aveo.com.au](mailto:companysecretarial@aveo.com.au)

*All queries regarding issues raised in this Charter should be directed to the General Counsel and Company Secretary.*

*This Code was reviewed and updates approved by the Board in January 2023.*