Procurement – Supplier Code of Conduct

Access Group Solutions is committed to ethical, sustainable, and socially responsible procurement and we expect the same high standards of our Suppliers. We view our Suppliers as partners, and we care about the way they do business when providing goods or services.

The Supplier Code of Conduct (Code) describes the minimum expectations in the areas of integrity, ethics, and conduct; conflict of interest, gifts, benefits, and hospitality; corporate governance; labour and human rights; health and safety; and environmental management. Suppliers are advised to review the Code and ensure that relevant areas of their business and supply chain meet these standards.

Application of this Code

Access Group Solutions seeks to work with its Suppliers to meet and exceed minimum expectations as outlined in this Code and continuously strives to improve the standard of its business practices. By Supplier, Access Group Solutions means any entity that supplies goods or services to Access Group Solutions. Where the Code refers to workers, it includes employees, contractors, agency and temporary staff of the Supplier and its related entities. Where the Code refers to the law it means the laws in the jurisdiction that apply where the goods are procured, or services are performed. Fundamental to this Code is an expectation that all Suppliers operate in full compliance with all laws, rules, and regulations of the jurisdictions in which they do business.

The expectations outlined in the Code are not intended to supersede or alter the Supplier's regulatory and contractual obligations. Access Group Solutions expects all Suppliers to commit to the Code as a minimum.

Access Group Solutions expects Suppliers to communicate the Code to their related entities, Suppliers and subcontractors who support them in supplying goods and services to Access Group Solutions, so that they are aware of, understand and comply with the Code.

Reporting misconduct, unethical behaviour, or suspected corruption

If a Supplier considers that another Supplier has deviated from or breached their obligations under this Code or that an Access Group Solutions employee has breached the AGS Employee Code of Conduct, it is expected to report these concerns to the General Manager immediately.

Corrective action process

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 a delegated Access Group Solutions' Representative. If requested by Access Group Solutions, Suppliers must provide evidence and confirmation of their compliance with the Code, including the provision of documents and records that support their compliance.

A. Integrity, ethics, and conduct

Access Group Solutions expects high standards of ethical conduct and compliance with all applicable laws. Suppliers are expected to be ethical in their business activities, including relationships, practices, sourcing, and operations.

Business integrity

Suppliers are expected to comply with all anti-bribery, anticorruption, and anti-money laundering laws. Suppliers must not engage in, either directly or indirectly, fraudulent, corrupt, or collusive activities.

Record keeping and documentation

Suppliers are expected to maintain adequate records that accurately record all financial transactions and information regarding its business activities, labour, health and safety and environmental practices in accordance with applicable laws, policies, and procedures.

Confidentiality

Suppliers must not improperly use any private, confidential, or commercially sensitive information in its possession relating to or in connection with its dealings with Access Group Solutions

Codes of Conduct employees

The Access Group Solutions Code of Conduct for Employees describe the behaviour that exemplify the Access Group Solutions values. The Access Group Solutions Code of Conduct apply to, and are binding on all employees, supervisors and managers

and a contravention may constitute misconduct. The Access Group Solutions values are integrity, loyalty, commitment, teamwork, and respect. Suppliers should respect these obligations in their dealings with Access Group Solutions employees.

B. Conflict of interest; gifts, benefits, and hospitality

Access Group Solutions believes that all business activities should be undertaken with impartiality and any conflict of interest should be raised and managed.

Conflict of interest

Suppliers must:

a. declare to a delegated Access Group Solutions Representative in relation to the goods or services provided, any situation that raises an actual, potential, or perceived conflict of interest related to or in connection with its dealings with Access Group Solutions; and

b. avoid financial, business, or other relationships which may compromise the performance of their duties under their business arrangement with Access Group Solutions. Under the Access Group Solutions Employee Code of Conduct, employees are expected to avoid actual, perceived, and potential conflicts of interest wherever possible. Any conflicts of interest that cannot be avoided are expected to be declared and managed appropriately.

Gifts, benefits, and hospitality

Access Group Solutions personnel must:

(a) conduct themselves with the highest standards of integrity, impartiality, and accountability; and

(b) perform duties without favouritism, bias or for personal gain.

C. Corporate governance

Commitment to sound management administration, risk, and corrective action systems, are key to a reliable supply chain for Access Group Solutions. Suppliers are expected to maintain sound administration processes.

Risk assessment and management

Suppliers should develop and maintain a process to identify, manage and control relevant risks associated with its operations. These include supply chain risks and risks relating to labour and human rights, health and safety, the environment, business ethics, and corporate governance.

Critical incident management

Suppliers should:

(a) identify and assess potential critical incident, emergency situations and business continuity risks; and

(b) develop and implement emergency plans and response procedures that minimise harm to life, environment, and property, while minimising disruption to business continuity.

Audits and assessments

To ensure compliance with this Code and the applicable laws, Suppliers are expected to:

(a) participate in periodic evaluations and operations.

(b) cooperate openly and honestly with any audit, assessment, or review.

D. Labour and human rights

Access Group Solutions believes that all workers in its supply chain deserve to be treated with dignity and respect. Suppliers are expected to provide a fair and ethical workplace, which upholds high standards of human rights and integrates appropriate labour and human rights policies and practices into its businesses.

Suppliers must ensure that their operations are free from any form of exploitation or forced labour and actively addressing and preventing modern slavery.

Anti-discrimination

Subject to applicable laws, Suppliers are expected not to discriminate against any worker based on age, disability, ethnicity, gender, marital status, political affiliation, race, religion, sexual orientation, gender identity, union membership, or any other status protected by law, in hiring and other employment practices.

Anti-harassment

Suppliers are expected to commit to a workplace free from workplace bullying, harassment, victimisation, and abuse. Suppliers are expected not to bully workers or threaten workers with, or subject them to, unlawful or inhumane treatment. This includes, but is not limited to, abuse and harassment which can be verbal, physical, sexual, or psychological.

Human rights

Suppliers are expected to provide goods and services in a manner consistent with any applicable human rights obligations.

Suppliers must ensure that their operations are free from any form of exploitation or forced labour.

Prevention of involuntary and underage labour

Suppliers are expected to:

(a) ensure that all work is undertaken without coercion.

(b) not use any form of forced, bonded or indentured labour; and

(c) employ only workers who are the applicable minimum legal age.

All use of temporary and outsourced labour should be within the limits of the law. Suppliers are therefore expected to:

(a) use all reasonable endeavours to ensure that the third-party recruitment agencies it uses are compliant with the provisions of this Code and applicable law; and

(b) be responsible for payment of all recruitment-related fees and expenses in recruiting foreign contract workers either directly or through third party agencies.

Working hours, wages, and benefits

Suppliers must:

(a) follow all applicable laws and regulations with respect to wages, working hours and workers compensation insurance.

(b) ensure that all workers receive their legally mandated minimum wages, benefits, superannuation, leave entitlements and time off for legally recognised holidays; and

(b) pay workers' wages as required under applicable laws in a timely manner and not be expected to use wage deductions as a disciplinary measure. All overtime is expected to be reasonable and paid at the rate and in accordance with the applicable laws.

Freedom of association and collective bargaining

Suppliers are expected to freely allow workers to associate with others, form and join (or refrain from joining) industrial organisations or associations of their choice and bargain collectively, or engage in any lawful industrial activity without interference, discrimination, retaliation, or harassment.

E. Health and safety

Worker health, safety and well-being is important to Access Group Solutions. Suppliers are expected to provide a healthy and safe work environment and integrate sound health and safety management practices into its business.

Workplace health and safety management

Suppliers must comply with all applicable laws relating to workplace health and safety.

Suppliers are expected to:

(a) manage occupational health and safety hazards; and

(b) provide workers with job-related training and consult with employees in relation to the provision of information and training.

F. Environmental management

Access Group Solutions is committed to promoting environmental responsibility. Suppliers are expected to minimise the environmental impact of their operations and maintain environmentally responsible policies and practices.

Environmental impacts

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 emissions.