

Supplier Code of Conduct

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1 Introduction

1.1 Purpose

Squadron Energy is committed to maintaining its business relationships in a manner consistent with our Values, our Code of Conduct and our legal and contractual obligations.

This Supplier Code of Conduct (the **Code**) sets out Squadron Energy's expectations of our suppliers, in their business relationship with us and others.

We will assess our suppliers' compliance with this Code, and any breaches will be taken seriously and may be investigated. When suppliers breach this Code or their actions are inconsistent with the Code, we will seek alternative suppliers.

In the event of a conflict between this Code and the agreement between us, the agreement will prevail.

1.2 Scope

This Code applies to those suppliers and contractors (including where applicable their affiliates and subcontractors) (each a **Supplier**) that provide goods or services to Squadron Energy Services Pty Ltd or any of its affiliates in the Squadron Energy group of companies (**Squadron Energy** or **SQE**).

In the event of a conflict between this Code and any act, legislation, law, rule, or regulation, the highest standard will prevail. This Code applies to all Suppliers, regardless of the geographical location of their operations or where they are engaged in the supply of goods or services.

2 Expectations of suppliers

Squadron Energy expects suppliers, as a minimum, to:

1. **Share our commitment to ethical, safe and responsible business and support our Values;**
2. **Meet and uphold the standards set out in this Code across their operations and workforce;**
3. **Promote minimum standards, consistent with this Code, throughout their supply chain;**
4. **Ensure a grievance process and whistleblower policy is made available to their employees and suppliers.**

3 Our Values

Our Values are the foundation of Squadron Energy. They are core to our successes and guide all our actions.

Humility	Courage and Determination
Empowerment	Enthusiasm
Family	Frugality
Generating Ideas	Integrity
Safety	Stretch Targets

4 Labour

4.1 Labour Standards

Squadron Energy respects the labour rights of workers. We expect Suppliers to afford their workers their labour rights, and to promote applicable labour standards in their supply chains.

Suppliers must ensure fair working conditions and wages including equal pay for equal work in their workforce. We expect the Supplier's workers to be treated fairly and to be able to live and work in safety and dignity.

4.2 Human Rights and Modern Slavery

We expect suppliers to uphold and respect human rights for all people in their business, promote human rights in their supply chain, and to expressly prohibit all forms of modern slavery.

Suppliers are expected to conduct business in a manner consistent with international human rights principles in the Universal Declaration of Human Rights; United Nations Guiding Principles on Business and Human Rights; ILO Core Conventions on Labour Standards; and United Nations Global Compact.

Suppliers must take reasonable steps to identify, assess, and address risks of child labour, bonded labour, human trafficking, forced labour, and other forms of modern slavery and slavery-like practices (**Modern Slavery Practices**) in their operations and supply chains, ensuring that the following Worker Core Principles are respected:

- **No Forced or Bonded Labour.**

Work should be freely chosen without threat of penalty or abuse. No worker shall be forced or coerced to work to repay a debt. Workers shall be free to leave their employment and their movement shall not be restricted (including by controlling identity papers, holding money deposits or restricting movement in other ways).

- **No worker should pay for a job.**

Fees and costs associated with recruitment and employment should be paid by the employer. Workers should not be charged recruitment fees or other costs associated with their migration for employment.

- **Workers should be paid fairly for the work they do.**

Workers should be paid fairly and in accordance with all local laws, including those relating to minimum wage, leave entitlements and other benefits. Employers should take steps towards paying workers a living wage, the minimum income necessary to meet their basic needs, including some discretionary income.

Overtime hours should not be excessive and should be compensated appropriately.

- **No child labour.¹**

No workers are under the age of 15 or under the local legal minimum age for work or mandatory schooling age, whichever is the higher. Young workers must not do work that is mentally, physically, socially, or morally dangerous or harmful. Work should not interfere with children's schooling, or their ability to benefit from it.

- **Respect rights of workers to freedom of association.**

Respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities.

¹ Core Principle 5 reflects the International Labour Organization Convention No. 138 on Minimum Age (C138)

- **Workers should be able to raise grievances safely.²**

Workers should have access to a mechanism to raise concerns which allows for confidential and anonymous reporting and protects workers from reprisal. There must be transparent processes for investigating and reporting on the issues raised through the reporting mechanism.

4.3 Respect at work

Suppliers are expected to commit to a workplace free from workplace bullying, harassment, victimisation, and abuse.

Suppliers are expected to take practical steps to ensure a workplace that does not tolerate discrimination, gender-based violence, harassment, or retaliation. Where all people are treated with dignity, courtesy, and respect, irrespective of age, gender, race, sexual orientation, political or religious belief, culture, marital status, family commitments, physical or mental ability.

We have a zero-tolerance approach to sexual harassment, and we expect our Suppliers to have the same approach within their workforces and in the places where their workers work.

4.4 Diversity and Inclusion

We expect suppliers to create an inclusive environment that celebrates diversity, making sure that all people feel valued, respected, and empowered to bring their whole selves to work.

5 Health and Safety

Suppliers' must comply with all applicable laws relating to workplace health and safety and ensure that their employees are fit for work and are free of sickness, fatigue or performance impairing substances. We have a zero-tolerance towards alcohol abuse and illegal drug use whilst suppliers are providing their services or products.

Our Safety Value and zero-tolerance approach also extend to violence, including in the workplace and community at large. Physical, verbal, psychological, emotional, sexual, and financial abuse or violence, isolation or preventing the practice of religion are all forms of violence.

All Suppliers are expected to have a health and safety policy (or equivalent) and provide training to ensure that their Staff understand the requirements of the policy. Suppliers should also have a system, to record, monitor, manage, minimise and report health and safety hazards, risks, incidents, and emergency response.

Suppliers must apply policies, procedures and systems which are consistent with, and where contractually required, comply with, Squadron Energy's safety policies and standards, management plans and procedures.

6 Ethics

Squadron Energy's brand and reputation are some of our most valuable assets. We expect Suppliers to protect this asset in the following ways:

6.1 Conflict of Interest

Suppliers must notify us of any actual or perceived conflicts of interest that arise in relation to the products and services being provided so that the appropriate steps can be taken to manage the conflict.

² Core Principle 7 reflects the United Nations' Guiding Principles on Business and Human Rights.

6.2 Compliance with Laws

Suppliers must comply with all prevailing laws, rules, and regulations in the place's they conduct their work. We expect this not only because of potential legal ramifications, but because it is the right thing to do. Laws form a minimum standard; this Code and our Values empower all Suppliers to seek to apply a higher standard where they can.

6.3 Anti Bribery & Corruption

We do not tolerate any form of bribery or corruption.

Suppliers must have and maintain their own policies and procedures which apply a standard which is consistent with Squadron Energy's Anti-Bribery and Corruption and Money Laundering Policy and complies with the requirements of the *Criminal Code Act 1995* (Cth) and where relevant, other applicable laws, including the Bribery Act (UK) and the Foreign Corrupt Practices Act (US).

Suppliers must comply with the relevant economic and trade sanctions laws (**Sanctions**) of the jurisdictions in which it operates. Suppliers must not engage in any activities that could lead to Squadron Energy breaching applicable Sanctions.

6.4 Gifts, Entertainment and Hospitality

Suppliers must comply with this Code and the law when offering or accepting any gifts, favours, meals, entertainment, or hospitalities to or from Squadron Energy's employees, customers, suppliers, business partners or their family members. Any such gift, entertainment or hospitality must be consistent with customary business practices and the recipient's policies.

6.5 Government and government agencies

Suppliers must conduct themselves according to the highest ethical standards in their relations with government on any project or matter related to Squadron Energy. Government relations includes all contact with governments, their agencies and representatives in national and local jurisdictions, and international bodies.

Suppliers should not engage with any governments, their representatives, or other public bodies (whether Australian or international) on any project or matter related to Squadron Energy without an appropriate Squadron Energy employee present.

7 Intellectual Property, Confidentiality and Privacy

7.1 Intellectual Property

Intellectual property rights are to be respected in accordance with the terms of the agreement between us. We expect suppliers to respect any data, technology, know how, or intellectual property rights to which it or its personnel may have access through its business relationship with Squadron Energy, and to never use that access for personal gain or outside of the scope of Supplier's business with us.

7.2 Confidentiality

Suppliers must respect and protect the confidentiality and privacy of personal, sensitive, and confidential information held by it or provided by Squadron Energy. Suppliers must only use Squadron Energy's

confidential information, data, copyrights, and trademarks in a manner that is permitted under its agreement with us.

7.3 Privacy

Suppliers are expected to apply adequate data privacy and security protections in their systems and processes to protect against unauthorised or unlawful access, use, disclosure, loss, alteration, damage or destruction of that information.

8 Communities

We expect suppliers to support the communities where they work on Squadron business or operations.

8.1 Indigenous rights and opportunities

Squadron Energy respects and acknowledges the United Nations Declaration on the Rights of Indigenous Peoples and the human rights principles it embodies, including the principle of free, prior and informed consent. Our objective is to obtain the consent of Traditional Custodians for activities located on their traditional lands. Our consent processes focus on reaching agreement on the basis upon which a project should proceed, as well as enabling access to appropriate grievance and dispute resolution processes.

Suppliers are expected to respect the rights and interests of Traditional Custodians and to protect and promote Indigenous history and culture, as well as ensure access to appropriate grievance and dispute resolution processes.

Suppliers are expected to operate in alignment with these principles and support Squadron Energy in working together with Traditional Custodians to manage cultural heritage responsibly and sustainably, to create minimal impact.

Suppliers are expected to adopt a policy with respect to the employment of local Aboriginal people and the engagement of local Aboriginal enterprises.

8.2 Local communities

Suppliers must have an approach to identifying and managing potential impacts of their activities on the communities in which they operate. Suppliers must demonstrate respect for these communities and endeavour to make positive contributions through ongoing honest and transparent engagement.

8.3 Security and human rights

All suppliers should conduct activities in accordance with security and human rights standards and national, state, and local laws. Regular training should be provided for security services employees and contractors on human rights, gender-based violence, and appropriate use of force.

9 Environment

Suppliers must work to minimise the impact they have on the environment from their activities in relation to Squadron Energy's business and operations.

Suppliers must commit to safeguarding our environment and protecting biodiversity for future generations.

Suppliers are expected to minimise the environmental impact of their activities and apply policies and systems which are consistent with, and where contractually required, comply with, Squadron Energy's environmental policies and standards, management plans and procedures.

All Suppliers are expected to have an environmental policy (or equivalent) and ensure that their employees understand the requirements of the policy. Suppliers should also have a system to measure, manage, minimise, and report the environmental impact of their activities.

Squadron Energy expects our Suppliers to (at a minimum) ensure the following standards are met:

- **Environmental permits and reporting:**

All required environmental permits (e.g. discharge monitoring), approvals, and registrations are obtained, maintained, and kept current, and their operational and reporting requirements are to be followed.

- **Pollution prevention and resource reduction:**

Emissions and discharges of pollutants and generation of waste are to be minimised or eliminated at the source or by practices such as adding pollution control equipment, modifying production, maintenance and facility processes, or other means.

The use of natural resources, including water, fossil fuels, minerals, and virgin forest products is to be conserved by practices such as modifying production and maintenance processes, materials substitution, reuse, conservation, recycling, or other means.

- **Waste and hazardous substances:**

Implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous).

Chemicals, waste, and other materials posing a hazard to humans, or the environment are to be identified, labelled, and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal.

- **Packaging:**

Actively avoid undue and unnecessary packaging wherever practicable and use recycled and recyclable materials wherever appropriate.

10 Reporting misconduct

The behaviour we walk by is the behaviour we accept. We want our Suppliers to apply our Integrity value by applying this Code, and reporting non-conformances.

All Suppliers and their workers are encouraged to report any actual or potential breach of this Code. To do so please use our confidential whistleblower reporting system via calling 1300 790 228, reporting online at <https://www.yourcall.com.au/report>.

Suppliers are requested to cooperate with any required Squadron Energy investigation or inquiry.

Squadron Energy is Australia's leading renewable energy company. Proudly Australian owned, our mission is to be a driving force in Australia's transition to a clean energy future by providing green power to our customers.

We develop, operate and own renewable energy assets in Australia.

With proven experience and expertise across the project lifecycle, we work with local communities and our customers to lead the transition to Australia's clean energy future.

Squadron Energy acknowledges the Traditional Owners of Country throughout Australia. We pay our respects to Elders past, present and emerging.

