

# SUPPLIER STANDARD

**STANDARD** 

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### 1 Introduction

#### 1.1 Conducting Business

GFG Alliance Australia aims to conduct business in a safe, responsible and equitable manner, in compliance with all applicable laws, regulations and internationally recognised standards and consistent with GFG Alliance Australia's corporate values. We seek to engage in business with suppliers who share these values and adhere to the minimum requirements outlined in this Supplier Standard. We expect all suppliers to comply with reasonable Australian community standards of ethics and business practices.

### 1.2 Expectation of our Suppliers

We trust that our suppliers share and will work with us to promote our shared commitment to ethical, safe and socially responsible practices and behaviours. We expect our suppliers to ensure that their employees and other group entities are aware of, and comply with, this Supplier Standard. We expect our suppliers (you) to also communicate this Supplier Standard to your subcontractors, agents and other parties who are engaged by you so that they are aware of, understand and comply with, this Supplier Standard when you or they are providing goods or services to, or on behalf of, GFG Alliance Australia.

### 1.3 Who is a Supplier?

In this Supplier Standard, references to the 'supplier' are intended to refer to the supplier, the supplier's other group entities, officers, employees, subcontractors, agents and other parties in their supply chain (as the context permits). This Supplier Standard also applies to anyone employed or engaged by a Supplier company and its subsidiaries, including employees (whether permanent, fixed-term or temporary), contractors, secondees, management staff, agents and directors "you". For questions relating to this Supplier Standard or our expectations of suppliers, please contact Procurement Centre of Excellence at procurement.coe@gfgalliance.com.

# 2 Modern Slavery, Human Trafficking & Human Rights and Child Labour

# 2.1 Human Rights, Modern Slavery & Child Labour

We have zero tolerance of slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have put in place a number of human rights focused policies. Accordingly, our Suppliers:

- must not use any form of child, forced or involuntary labour and abide with all international standards and domestic regulations relating to the employment of children
- must comply with all relevant, local and national laws and regulations with regards to employment practices, benefits and anti-discrimination



- must have written workplace management policies and standards inclusive of equal opportunity, antidiscrimination and anti-harassment, bullying principles and employee grievance resolution
- must be able to evidence compliance with workplace management policies and standards outlined above.

# 3 Health & Safety

### 3.1 Safe Workplace

We are committed to pursuing a high standard of health and safety throughout our operations and strive for continual improvement of health and safety. Accordingly, we expect our Suppliers must:

- maintain a safe workplace
- · comply with all applicable health and safety laws
- · implement continuous improvement and management systems to ensure compliance and effective controls
- adopt early intervention programs and rehabilitation to prevent injuries and illness
- comply with our reasonable health and safety requirements as set out in any applicable GFG Alliance Australia
  policies, standards and guidelines in place from time to time and including any additional requirements relating to
  health and safety incorporated into any contractual arrangements with suppliers
- provide all necessary supervision, training, instruction, equipment, resourcing and information to all its workers
- consult on issues that may affect health and safety as it relates to GFG Alliance Australia
- · integrate health and safety into its planning, design, importing, manufacturing and supply
- review, monitor and evaluate health and safety its performance.

# 3.2 Discrimination, Harassment and Abuse

We expect our suppliers to act with dignity and respect toward their workforce by promptly taking action against inappropriate workplace behaviour. Our suppliers should not engage in or support discrimination on any unlawful ground, including due to gender (or gender identity or expression), physical, mental or intellectual abilities, race, ethnicity, age, sexual orientation, intersex status, relationship status, family or carer's responsibilities, pregnancy, socio-economic status, culture and identity, religious or political beliefs or professional background experience. Our suppliers should not use or tolerate threats, acts of violence, harassment or physical, mental, verbal or sexual abuse in its dealings.

# 3.3 Specific GFG Site Considerations

Each GFG Alliance site is different, with unique health and safety requirements to consider. Site-specific safety procedures have been established to reflect these inherent risks, to protect our employees and visitors to these sites. This means that qualification and approval to perform work on one site does not equate to approval to enter any GFG Alliance site. Your GFG Alliance Australia procurement representative or site contact is able to inform you of these



requirements prior to commencing work or entering each site. In addition to site-specific standards or procedures there may also be certain GFG Alliance Australia business area standards and guidelines that may be provided to you.

# 4 Ethical Practises and Professional Integrity

### 4.1 Ethical Practices and Fraud & Corruption

Suppliers must comply with all applicable laws and regulations regarding anti- bribery, corruption and prohibited business practices. Suppliers must conduct business in an ethical, equitable and professional manner. This means that suppliers must act ethically and responsibly in your approach to business decisions. In negotiating and administering contracts and other business relationships, you are expected to be fair and reasonable. You must not behave in any way that is, or might be construed as being harsh, oppressive, unconscionable, unethical, coercive or dishonest. Suppliers must disclose any part of their business operations that may not meet reasonable Australian community standards of ethics and business practices.

# 5 Professional Integrity

### 5.1 Whistleblowing

In support of the human rights policy, our whistle-blowing policy allows (amongst other matters) potential breaches of human rights and modern slavery concerns to be escalated and handled in a confidential and sensitive manner.

## 5.2 Confidentiality & Intellectual Property

The GFG Alliance brand is a symbol of industrial revival, low-carbon solutions and powerful change, and represents our distinctive business model of transformation, innovation and growth. The flame (however incorporated), the symbol of the GFG Alliance, emphasises the shared direction and purpose of all our companies. As our businesses and brand evolve, it becomes increasingly important for us to uphold this brand value, which is pivotal to the longevity of our relationships with customers, employees and the broader environment in which we operate. Therefore, the consistent representation of our brand is paramount to the value our name brings to our businesses. We have developed the brand guidelines document to provide clear guidelines for Suppliers how to use the brand consistently, including colours, fonts, livery and correct use of any of our trademarked logos and style. In instances where you are required to reproduce our brand for the supply of goods to us, the elements of GFG Alliance's brand guidelines document must be adhered to.

#### 5.3 Conflicts of Interest

If you have a conflict of interest, this must be declared to us prior to supplying, or, if you are a current supplier or contractor, as soon as the conflict of interest arises. A conflict of interest arises when a person or company is in a position which requires them to balance their own interests or the interests of others (such as another company



friends or relatives) against the interests of our company. You must fully and promptly disclose to us any private or other business interests or other matters which may lead to potential or actual conflicts of interest.

### 5.4 Gifts and payments to officials

Our employees cannot accept gifts or hospitality that extend beyond common courtesies associated with ordinary and proper course of business, and in the interests of ethical supplier behaviour, such invitations should not be offered to our employees or our companies. Further nothing of value should be offered or paid to a foreign public official on our behalf to influence the award of business decisions or make business decisions in our favour. Our Anti-Bribery and Corruption Policy and Code of Conduct covers this in more detail.

# 6 Publicity & Advertising

Our Suppliers must not (without prior consent from us in writing):

- use our name or logos in publicity or advertising
- use the suppliers' business relationships with us to imply any endorsement by GFG Alliance Australia of the suppliers' goods or services, or
- make any representation or statement for, or on behalf of, us.

# 7 Privacy

Our suppliers should respect the privacy rights of their employees and all parties that they deal with, and protect all data that they store or access. This includes complying with applicable privacy laws and regulations, as well as our privacy and security policies.

# 8 Corporate Social Responsibility

## 8.1 Social & Community

In this world of limited resources, rising population and cycles of prosperity and recession, we need a new model for industry and a smarter way of using resources. We have a vision which sees a more sustainable and non-cyclical future for industry as a foundation for a stronger and more prosperous society. Our mission is to re-establish the pivotal position of metals manufacturing and engineering in the geographical markets where it operates through using local resources, sustainable energy, investment, technology and skills. Its strategy for delivery uses its extensive industrial, commodity and financial resources that work together to achieve an outcome that is larger than the sum of its parts. We consider the social and environmental impacts of procurement activities and prioritises and aims to:



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- reflect our commitment to acting ethically and with integrity in all our business relationships
- consider the impacts of our procurement decisions on communities and we will strive to support community involvement through local employment and skills development.

### 8.2 Diversity & Inclusion

Our suppliers should seek to adopt, where appropriate, practices which promote diversity and inclusion within their workforce and supply chain. Suppliers must promote an inclusive workplace free of discrimination, harassment, bullying and other unlawful behaviour on discriminatory grounds including gender, age, race, nationality or ethnic origin, disability, family responsibilities, marital status, medical or irrelevant criminal record, political views, pregnancy or potential pregnancy, religious beliefs or activity, sexuality or sexual orientation, trade union activity, physical appearance, social origin or carers' responsibilities.

#### 8.3 Environment

We aim to reduce the direct environmental impact of our operations and that of the activities occurring along our supply chain. We will prefer suppliers who act responsibly in managing the environmental impacts of their business operations. At a minimum, suppliers are expected to:

- · comply with all relevant local and national laws and regulations on environmental management and reporting
- implement and maintain a written environmental policy
- establish and maintain a data collection process aimed at tracking environmental performance over time and supporting environmental reporting and compliance with legislative requirements
- strive to reduce environmental harm by maximising the efficient use of natural resources, energy, water and raw materials and minimise pollution (inclusive of greenhouse gases pollution) and waste
- suppliers must comply with our environmental requirements
- promote the use of energy and water efficient products
- to continually improve their sustainability practices and environmental performance outcomes
- seek goods and services that have the least adverse impact on the environment and human health over their entire lifecycle
- consider strategies that minimise waste and where possible aim to avoid, reduce, reuse or recycle goods and/or service.

# 9 Compliance

We will deal with suppliers who comply with applicable laws and regulations relating to your business conduct and operations, in particular those relating to modern slavery and chain of responsibility. We will review and may cease dealing with any supplier or contractor who is found to have acted unethically or illegally. You should be aware, accountable and responsible for all your actions and act in accordance with our policies, standards and procedures in a lawful, fair, transparent and ethical manner. You should also consider how you deal with any serious or sensitive



concerns about wrongdoings or malpractice (whistleblowing) in your organisation. You must implement policies and practices aimed at identifying strategic and operational risks, vulnerabilities and your compliance obligations and should facilitate risk awareness, communication and mitigation within your business.

# 10 Application

### 10.1 Supplier Standard part of Agreement

This Standard is incorporated into all our contracts or agreements with yours. To the extent that our contractual arrangements contain more detailed requirements in respect of any standards or procedures covered in this Standard, this Standard is intended to supplement (and not override) those contractual obligations. In some circumstances, we may require you to complete self-assessments and/or an annual declaration which confirms their compliance with this Standard or any of the applicable policies to your supply to us.

### 10.2 Supplier Self Assessments

We expect our suppliers to seek compliance with this Standard through its written corporate policies, practices, procedures and management systems. Depending on the context, these may include:

- processes which facilitate compliance with, and identify risks of non-compliance of, the principles in this Standard
- periodic assessments of the supplier's compliance with this Standard and reporting of relevant compliance information to us
- processes which enable the timely correction of any non-compliance with this Standard
- ways the principles in this Standard are communicated to other actors within their supply chain, and
- appropriate training for relevant members of their workforce to ensure appropriate understanding of the principles in this Code.

We may ask to see those policies, and any other reasonably supporting documentation, to demonstrate a supplier's compliance with this Standard and for the purposes of our risk management and reporting systems.

# 11 Notification if unable to comply

Our suppliers must promptly notify us if you, or another party in your supply chain, become aware or reasonably suspects that it is unable to comply with the principles in this Standard.

