

Sea Swift 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 us with goods or services, including construction works and services.

This 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; child safety and environmental management. Suppliers to Sea Swift are advised to review the Code and ensure that relevant areas of their business and supply chain meet these standards.

## APPLICATION OF THIS CODE

Sea Swift 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, Sea Swift means any entity that supplies goods or services, including construction works and services, to Sea Swift.

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. Sea Swift expects all existing and new Suppliers to commit to the Code. Suppliers should check their respective contracts, agreements and purchase orders as they may contain additional obligations or higher standards than those set out in this code.

Sea Swift expects Suppliers to communicate the Code to their related entities, Suppliers and subcontractors who support them in supplying goods and services to Sea Swift, 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 a Sea Swift employee has engaged in serious misconduct and / or breached any Sea Swift Policy, it is expected to report these concerns to an appropriate member of Sea Swift's leadership team.

## Whistleblower Policy

Suppliers are included in the Sea Swift's Whistleblower Policy which aims to support Sea Swift's commitment to fairness, honesty, openness, integrity, and respect by providing a channel for complaints to be reported in confidence. Suppliers are encouraged to speak up about matters that involve wrongdoing so that appropriate steps can be taken to address behaviour inconsistent with Sea Swift's values. Sea Swift's Whistleblower policy can be viewed online at <https://seaswift.com.au/>

## 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 or discuss and seek clarification of any elements of the Code with Sea Swift's Procurement Manager or their primary Sea Swift contact in relation to the works, goods or services they are providing.

If requested by Sea Swift, Suppliers must provide evidence and confirmation of their compliance with the Code, including the provision of documents and records that support their compliance. Suppliers are expected to support Sea Swift in reviewing compliance with the Code.

## MINIMUM ETHICAL STANDARDS FOR SUPPLIERS

### A. Integrity, ethics and conduct

Sea Swift 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. Disclosure of information is expected to be undertaken without falsification or misrepresentation.

**Professional conduct**

Suppliers are expected to conduct themselves in a manner that is fair, professional and that will not bring Sea Swift into disrepute.

**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 Sea Swift.

**Sea Swift Values**

Sea Swift's corporate values are:

- Resilience
- Innovation
- Accountability
- Trustworthiness

Suppliers should respect and reflect these values in their dealings with Sea Swift's employees.

**B. Health and safety**

Worker health, safety and well-being is important to Sea Swift. 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**

Sea Swift has adopted the "It's OK To Stop" approach to health and safety in the workplace. This same

philosophy applies to Sea Swift suppliers, all of whom are empowered to stop work if there is an uncontrolled risk to people, equipment, or the environment.

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

Suppliers are expected to:

- comply with all safety directions given by Sea Swift representatives;
- possess and properly use appropriate personal protective equipment;
- manage occupational health and safety hazards; and
- provide workers with job-related training and consult with employees in relation to the provision of information and training.

**C. Conflict of interest; gifts, benefits & hospitality**

Sea Swift 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:

- declare to Sea Swift's Procurement Manager any situation that raises an actual, potential or perceived conflict of interest related to or in connection with its dealings with Sea Swift; and
- avoid financial, business or other relationships which may compromise the performance of their duties under their business arrangement with Sea Swift.

Sea Swift 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**

Sea Swift personnel must:

- conduct themselves with the highest standards of integrity, impartiality and accountability; and
- perform their duties without favouritism, bias or for personal gain.

The appropriate handling of offers of gifts, benefits and hospitality is critical to earning and sustaining trust. As such, Suppliers are expected not to:

- offer Sea Swift personnel gifts or benefits, either directly or indirectly, and offers of hospitality will be limited to token offers of basic courtesies (such as tea and coffee during a meeting); or
- take any action to entice or obtain any unfair or improper advantage.

#### **D. Corporate governance**

Commitment to sound management administration, risk and corrective action systems, are key to a reliable supply chain for Sea Swift. 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:

- identify and assess potential critical incident, emergency situations and business continuity risks; and
- 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:

- perform periodic evaluations of their facilities and operations, and the facilities and operations of their subcontractors; and
- cooperate openly and honestly with any Sea Swift audit, assessment or review.

#### **E. Labour and human rights**

Sea Swift 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 business.

##### **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.

Consistent with relevant modern slavery legislation, Suppliers are expected to proactively identify, address and – where required by legislation – report on risks of modern slavery practices (defined broadly to include all forms of human trafficking, forced labour and slavery-like practices) in their business operations and supply chains.

##### **Prevention of involuntary and underage labour**

Suppliers are expected to:

- ensure that all work is undertaken without coercion;
- not use any form of forced, bonded or indentured labour; and
- 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:

- 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
- 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:

- follow all applicable laws and regulations with respect to wages, working hours and workers compensation insurance;
- ensure that all workers receive their legally mandated minimum wages, benefits, superannuation, leave entitlements and time off for legally recognised holidays; and
- 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.

#### **F. Child safety**

Suppliers are expected to provide a work environment that prioritises the safety of all children.

#### **Child safety management**

Suppliers must comply with all applicable laws relating to child safety.

Suppliers are expected to:

- manage child safety risks; and
- promptly report to Sea Swift, any child safety issues (including allegations of harm of a child)

that have occurred in connection with work undertaken for Sea Swift.

#### **G. Environmental management**

Sea Swift 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:

- ensuring the safe storage, transportation and disposal of hazardous substances including hazardous waste;
- maintaining policies and practices for the efficient use of energy, water and natural resource consumption; and
- maintaining policies and practices that reduce the risk of pollution, loss of biodiversity, deforestation, damage to ecosystems and greenhouse gas emissions

#### **Community engagement and Support**

Sea Swift supports several local community organisations, particularly in the communities that it serves. Sea Swift is committed to these communities by developing lasting relationships built on respect, and mutual benefit.

Sea Swift prefers to work with like-minded suppliers who support community engagement initiatives directed at local employment and procurement to build capacity in local communities.