

## CODE OF CONDUCT Suppliers / Subcontractors / Consultants

By agreeing to supply goods and services to Spaceframe Buildings Pty Ltd, all suppliers, subcontractors and consultants (collectively called Suppliers) agree to comply with the Code of Conduct set out below.

Spaceframe Buildings Pty Ltd aims to be the next generation, evolved design and construct company in our marketplace. As part of our commitment in meeting that objective is to ensure we source goods and services in an ethical, lawful and socially responsible manner.

Our Code of Conduct set out below, highlights the standards and expectations of code that we ask of all parties within our supply chain.

Code of Conduct Requirements

We expect all suppliers to abide by the principles set out in this Code as part of doing business with us. No part of this Code can be amended, varied or waived without our written approval.

Suppliers may be required to complete an annual assessment of compliance with this Code and we may audit to endure compliance with this Code. If that audit reveals a non-conformance, the Supplier must rectify the non-conformance reasonably and promptly.

Legal Requirements

Suppliers must abide by all applicable laws, rules, regulations, mandatoryguidelines, orders and codes and any standards in force from time to time, both in Australia and any other country in which the supplier operates.

The provisions of this Code are in addition to the specific provisions of any legal agreement between the supplier and Spaceframe.

Part of our business model calls for all Suppliers to assist us to combat modern slavery and accordingly, Suppliers must comply with the Modern Slavery Act Australia 2020 in all respects. Human rights, fair working conditions and responsible labour sourcing must be fully upheld by all Suppliers, ensuring that they never receive forced labour or exploit anyone by forcing them to work by using threats, force, coercion, abduction or exerting any other form of control over them. Suppliers are also expected to ensure the same of supplier's upstream supply partners.

All Suppliers involved in our supply chain must comply with all workplace laws to provide equal, fair and safe work opportunities for all workers. Suppliers must not use child labour. Suppliers must not use illegal labour.

Suppliers must ensure compliance with the minimum national or industry stanfdards for wages and benefits. Any overtime must be voluntary and compensated as prescribed by local laws.

Suppliers must ensure that their workplaces are free from discrimination, harassment and bullying.

Proper policies for rolling out and monitoring these human rights and work practices must also be upheld by all Supplier.

All workers employed by our Suppliers must have a safe and clean working environment. If required, a supplier must be certified to ISO 45001 Occupational Health and Safety or an alternate recognised system.

Supplier's workers must receive adequate, recorded training and be competent to carry out their role safely. PPE should also be provided by Suppliers to all employees.

Heavy Vehicles - Chain of Responsibilities

All Suppliers must demonstrate full compliance with Heavy Vehicle National Laws.

Suppliers should always maintain best road transport industry practices including scheduling, loading and unloading, vehicle safety, vehicle mass and dimension, speeding, driver behaviour and safety, driver fitness, driving hours and fatigue management and security.

Suppliers must not make or impose any demands or requirements on any supply chain participant that would cause any person to breach applicable road transport laws.





All Suppliers must demonstrate full compliance with Non-Conforming Building Products Laws.

Suppliers must ensure that they and their Sub-suppliers maintain and are able to provide all information relating to building products supplied and shall always comply with any notices issued relating to Non-Conforming Building Products.

Environment

All Suppliers must comply with local and national environmental laws and regulations and if required must be certified to ISO 14001 Environmental Management Systems or an alternate recognised standard on environmental protection.

Fair Competition

Suppliers must comply with all fair competion laws relating to honest, transparent and in good faith business dealings, ensuring proper record are kept and prompt disclosure is made to us of any actual or potential conflicts of interest.

All Suppliers are prohibited from conduct involving bribery, favours or unlawful or improper payments in business or otherwise.

**Confidential Infomation** 

Confidential information belonging to Spaceframe Buildings Pty Ltd includes, without limitation, information relating to our business, products, customers, suppliers, pricing, costs, intellectual property and other proprietary rights, know-how, trade secrets and strategies.

A confidentiality and non-disclosure agreement with us may be required in advance of any disclosure of confidential information to include all Suppliers' employees who require access to such confidential information.

Suppliers must not disclose Spaceframe Buildings' confidential information to any person other than on a 'needs to know' basis to their employees who have signed a confidentiality undertaking.

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Spaceframe Buildings has a Whistleblower Policy (refer to our website <u>https://www.spaceframe.com/company-policies-and-documents</u>. If a Supplier believes that an employee of Spaceframe, or anyone acting on behalf of Spaceframe, has engaged in illegal or otherwise improper conduct, a supplier should report the matter via our external reporting service called Stopline at <u>https://spaceframegroup.stoplinereport.com/</u>. Disclosures may be made anonymously.

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