

Supplier Code of Conduct

McMillan Shakespeare Group of Companies

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MMS Supplier Code of Conduct

McMillan Shakespeare Group (MMS) is committed to ensuring we work with our suppliers fairly, transparently and with the highest level of integrity. We are committed to delivering our strategies and operational objectives in accordance with all applicable laws, regulations, bylaws and codes and we expect all our suppliers to also work within these frameworks.

This Code is not intended to supersede any legal, regulatory, or contractual obligations. The Code is to establish a minimum set of Supplier standards and Suppliers should refer to respective supply agreements, contracts and purchase orders with MMS. In the case of any conflict with supply agreements, contracts and purchase orders that may place additional or higher obligations than those set out in this Supplier Code of Conduct, suppliers must ensure they comply with those additional, or higher obligations.

Where subcontracting is used to support the service delivery to MMS, the Supplier must make certain that their subcontractor(s) comply with this Code.

Business Conduct

MMS expects our suppliers to conduct business in an ethical manner at all times. Suppliers are expected to abide by all legislative requirements, including anti-modern slavery, anti-bribery, corruption and money laundering laws as well as having governing policies in place including but not limited to an anti-corruption policy. Any real or perceived conflict of interest is to be declared to MMS as soon as it becomes or ought reasonably to become apparent.

Environmental Management

Suppliers are expected to minimise their environmental impact and maintain responsible environmental practices.

MMS expects suppliers (on request) to provide information on their greenhouse gas (GHG) emissions as they relate to goods and/or services provided to MMS as well as information about the products and/or services provided by the supplier to MMS to enable MMS to transparently and accurately report its scope 3 GHG emissions.

Labour and Human Rights

MMS expects suppliers to comply with all employment-related legislation, including but not exclusive to fair wage, working hours, working conditions, as well as anti-discrimination legislation.

Non-discrimination

Subject to applicable laws, suppliers must not discriminate against any existing or prospective worker based on race, ethnicity, gender, age, disability, religion, marital status, gender identity, political beliefs, union affiliation, sexual orientation, nor any other status protected by law within the jurisdiction in which the Supplier operates.

Bullying and Harassment

Suppliers are to provide a safe working environment free from workplace bullying, harassment, victimisation and abuse.

Forced, Compulsory, Child and Underage labour

Suppliers must not use any form of bonded, forced or compulsory labour, engage in slavery or human trafficking. All labour should be freely given and employees free to leave in accordance with the relevant workplace legislation. Suppliers must ensure that no child labour is used, employing workers who are of the applicable minimum age under labour law.

Modern Slavery reporting

MMS may request suppliers to complete a modern slavery questionnaire prior to engagement, periodically during the term of the contract and also in the event of a material change in ownership, business operations or products and services provided to MMS. Suppliers for which MMS' risk assessment process triggers the completion of this questionnaire may be required to review and provide updated responses or meet with representatives from MMS to discuss their approach to modern slavery. MMS may take any action it deems appropriate in the event of unsatisfactory anti-modern slavery practices.

Freedom of Association

Suppliers are expected to allow workers to choose to join (or not) industrial organisations and engage in lawful industrial activity without discrimination, intimidation or harassment.

Workplace Health and Safety

It is expected that all MMS suppliers will provide their employees, contractors, sub-contractors and visitors with a safe working environment.

Suppliers must comply with all relevant Workplace Health and Safety and worker's compensation legislation and have adequate systems in place to deal with and respond to incidents and workplace health and safety emergencies.

Suppliers must notify MMS of incidents including workplace health and safety emergencies arising when or in connection with servicing MMS' staff and/or customers.

Privacy

MMS requires suppliers to go through a detailed approval process before getting access to MMS' data. If suppliers have access to MMS data, the suppliers must apply data privacy and security protections to the minimum standards set out in MMS' privacy policy, security standards and any further protections required under any laws or supplier agreement in place. Suppliers must also respond to MMS' request for information during security assessments or any other requests regarding their information handling practices.

Suppliers who collect, use or store MMS' data must have procedures in place to ensure all obligations under MMS' privacy policy, individual supplier arrangements and applicable privacy laws are met. Any breach, or potential breach of these policies, arrangements, laws or standards is to be reported to MMS as soon as it becomes or ought reasonably to become, apparent.

Supplier diversity

MMS is committed to building a supplier portfolio that shares our commitment to sustainability, climate action, diversity and inclusion and making a positive impact on the communities in which we operate.

Where commercially viable MMS encourages our suppliers to source or sub-contract from suppliers whose business activities:

- Offer products and services with low to no carbon impact and other innovative and sustainable capabilities and solutions;
- Address diversity and inclusion, for example Aboriginal and Torres Strait Islander businesses, female-owned businesses or disability enterprises;
- Strive to foster the social and economic development of communities in which they operate; and
- Engage under-represented individuals and social businesses in their own operations and supply chains.

Compliance to Supplier Code of Conduct

- It is expected that all suppliers adhere to the MMS Supplier Code of Conduct. MMS may ask the supplier to conduct a self-assessment against our Supplier Code of Conduct, or periodically request additional information about the suppliers' business practices. MMS expects that these assessments or requests for information will be provided promptly, honestly and completely.
- Where the MMS Group believes the supplier is or may be in breach of the Code, MMS may review or audit the supplier's compliance. If this action is necessary to determine compliance, suppliers are to provide all requested assistance, including providing any information and documentation requested by MMS. Any actual or potential non-compliance with the Code that is deemed by MMS to be material may result in the termination of the supplier relationship.

Whistleblower Policy

Breaches of this Code can be anonymously reported under MMS's Whistleblower Policy found here <https://mmsg.com.au/document/governance/aunzwhistleblower-policy>