

Supplier Code of Conduct

Document Owner:

Head of Procurement

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Cleanaway's business success is built upon our commitment to our mission, ***Making a sustainable future possible together***. Suppliers are an integral part of helping us become the market leader in resource recovery, a complex and essential service that must incorporate sustainability at every level.

This Code sets out Cleanaway's minimum expectations which we require of our suppliers. Our suppliers' ability to meet or exceed these expectations will be considered when we make procurement decisions. We may elect to not work with or cease to work with suppliers who do not meet our expectations.

This Code aligns with the [United Nations Global Compact \(UNGC\) principles](#) and the [International Labour Organisation \(ILO\)'s Declaration on the Fundamental Principles and Rights to Work](#). Cleanaway's commitment to UN Global Compact's Sustainable Development Goals (SDGs) is outlined in detail in our [Annual Report](#).

In this Code, "suppliers" means suppliers, and their subsidiaries, contractors and respective personnel; "we", "our" and "us" means Cleanaway Waste Management Limited and its controlled entities; and "you" and "your" means our suppliers.

Our Values

Our values guide how all our stakeholders, including suppliers, are expected to behave. They capture what we care most about and demonstrate our commitment to high ethical standards and behaviours:



Home Safe

We take responsibility for our personal safety, as well as that of our team. We are committed to Goal Zero, because everyone deserves to go Home Safe, every day.



Stronger Together

Building from a place of strength, we are focused on creating something stronger than the sum of our parts each and every day.



Integrity

We do the right thing – no matter what. Holding ourselves to higher standards, we say what we mean, and we do what we say.



We Make A Difference

We are proud of what we do to make a sustainable future possible – for our employees, our customers, our investors, the communities in which we work, and the planet.

1. Home Safe

1.1 Safety

Our suppliers play a significant role in our business and our commitment to keep each other, our workers, customers and the public safe with the objective of zero harm. If you are one of our key suppliers, you must have a documented set of policies and programs aimed at promoting a safe, healthy, and secure workplace and compliance with all applicable laws and regulations in the jurisdictions in which you operate.

2. Stronger Together

2.1 Celebrating diversity and inclusion

As a Cleanaway supplier you must ensure that any form of bullying, discrimination, or physical, sexual, psychological, or verbal harassment or any other form of abuse is not tolerated within your organisation and that all your employees and contractors are treated with respect and dignity, regardless of their gender, race,

ethnic origin, religion, marital status, age, physical and mental ability, sexual orientation and/or any other protected attribute.

3. Integrity

We only work with suppliers who commit to complying with all applicable local and national laws and regulations wherever they operate. As a supplier to us we expect you to have a process in place to ensure that your own sub-suppliers, service providers and subcontractors also comply with such laws. This includes all applicable labour, employment, environmental, human rights, wage and hour, privacy, health and safety, competition and consumer laws.

Cleanaway's Human Rights Policy can be found here: [\[Human Rights Policy\]](#)

We expect you to maintain accurate, transparent records of your business operations, permits and licenses, and to carry out your work in a way that does not adversely impact our licence to operate.

3.1 Modern Slavery reporting and compliance

Modern slavery refers to situations of serious exploitation of workers, including human trafficking, forced labour, debt bondage, deceptive recruiting practices, and child labour. In Australia, this is governed by the *Modern Slavery Act 2018 (Cth)* (the **Act**). The Act requires Australian businesses with a certain annual revenue threshold to minimise modern slavery risks in their supply chains through mandatory reporting and continuous improvement.

At onboarding, all key suppliers are asked to provide information on their modern slavery practices. We also review our high-risk and high-spend suppliers to ensure compliance with this legislation by analysing supplier policies, management systems, third-party certifications, and other relevant information.

Cleanaway's FY21 Modern Slavery report can be found here: [\[FY21 Modern Slavery Report\]](#)

3.2 Sustainable procurement

We are committed to driving positive environmental, social, and governance (**ESG**) outcomes for our community, including through our supply chain. As part of our procurement process, social enterprises, companies with outstanding sustainability practices and companies that have demonstrated commitments to Aboriginal and Torres Strait Islander (**ATSI**) employees and the community are looked upon favourably.

Cleanaway's Social Procurement statement can be found here: [\[Social Procurement at Cleanaway\]](#)

3.3 Anti-bribery and corruption

Cleanaway's suppliers must act with integrity, transparency and honesty.

We have a zero-tolerance approach to bribery, corruption, fraud, unjustified or inflated commissions or money laundering and illegal practices, whether directly or indirectly, and we require you to report any observed or suspected misconduct.

Cleanaway's Anti-Bribery and Corruption Policy can be found here: [\[Anti-Bribery and Corruption policy\]](#)

3.4 Conflicts of Interest

We require you to avoid all conflicts of interest which may arise when you perform work for us and in your related business decisions.

If you are in a position where any actual, potential or perceived conflicts of interest arise, they must be declared to us as soon as possible, so that appropriate steps may be taken to manage the relevant conflict(s).

3.5 Confidential Information and Privacy

You must respect and maintain the confidentiality of our information. You must not allow our information to be used or disclosed, except to the extent authorised in your contract with us. If you become aware of, or suspect, any unauthorised use or disclosure of our confidential or proprietary information, including where you have been given access to our information in error, you need to let us know as soon as reasonably practicable.

You must respect and comply with applicable privacy laws.

4. We Make a Difference

4.1 Environment

Consistent with our mission of ***Making a sustainable future possible together***, Cleanaway is a dedicated leader in providing environmentally sustainable solutions. Suppliers who take proactive steps to act responsibly in managing the environmental impacts of their businesses will be viewed favourably as part of Cleanaway's procurement processes.

All tenders run by the Procurement function include mandatory questions regarding a supplier's sustainable practices and compliance. These questions are weighted and considered as part of a formal evaluation. We consider environmental compliance as a mandatory requirement to be considered for a supplier relationship with Cleanaway.

5. Enforcement provisions

We will monitor your compliance to this Code, and we reserve our right to verify your compliance with this Code. If we elect to do so, you must co-operate with our audit process by providing all information, documents and access to staff, as we may reasonably require. If we identify any deficiencies as part of our assessment, we expect you to work with us to correct these deficiencies on a timely basis.

It is not the intention of this Code to impose unnecessary requirements or obligations on our suppliers. Any assessment we make of your compliance with this Code will be risk-based, considering your size, scope and business activities. Our expectation is that as a supplier, you will have adequate processes in place to manage the risks that are relevant to your business and supply chain.

While we do not tolerate any critical breaches of the Code, we do not walk away from suppliers facing genuine difficulties in achieving compliance. Our first aim is to ensure that any such difficulties are addressed and remedied, and practices put in place to avoid any recurrence. If we consider that you are both capable and committed to avoid recurrence, we will usually continue to work with you until and unless there is any repetition.

However ongoing non-compliance with our principles and expectations as communicated by us to you may lead Cleanaway to terminate our business relationship with you.

Conduct hotline

We are committed to a culture of transparency and encourage our employees, contractors, suppliers and other stakeholders to speak up about their issues and concerns.

As a Cleanaway supplier, you and your workers can access FairCall, an independent 3rd-party service provider which specialises in handling sensitive and confidential reports. Our Whistleblower Policy details how to access this service: [\[Cleanaway Whistleblower Policy\]](#).

If you become aware of or suspect any circumstances or conduct which may not comply with this Code, we strongly encourage you or your workers to speak up to your Cleanaway contact or report it via FairCall.

Questions

If you have any questions regarding this Code, or about the expectations we have for our suppliers and business partners, please consult your Cleanaway procurement representative or send an email to procurement.department@cleanaway.com.au.

Version control table

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