



Supplier Code of Conduct

**ACKNOWLEDGEMENT
OF COUNTRY**

Cleanaway acknowledges the Traditional Owners of the lands on which we operate and in the communities in which we exist. We pay our respect to all First Nations people

We are proud to pay our respect to Elders past, present and future for they hold the traditions and the culture, and together we hold the hopes of a truly reconciled Australia.



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About Cleanaway

As one of Australia's leading total waste management providers, we are here to help enable our society's transition to a more sustainable future.

To some, waste may seem like an ordinary part of everyday life, but we know it has extraordinary potential. We see all waste as a resource, therefore managing Australia's waste needs isn't a matter of asking *"Where does it go now?"*, but *"What can it be next?"*

For over 50 years, we have supported Australian businesses by delivering solutions that offer benefits not only to our customers, but also for the communities and environment we live in.

With a prized network of state-of-the-art facilities, transfer stations, engineered landfills, liquid treatment plants and refineries, we offer customers an unrivaled capacity to collect, process, treat, recycle or safely dispose of a variety of waste types.

Cleanaway's business success is built upon our commitment to our mission, ***Making a sustainable future possible together.***

Our goal is to lead the transition to a more sustainable future, and our suppliers are an integral part of helping us enable the shift to a circular economy.



Cleanaway's values

Our Values guide how we behave as individuals and as a group.

They provide clarity about what is important to us, guiding our priority setting and decision-making processes. This Code is underpinned by our Values and demonstrates Cleanaway's 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.





About this Supplier Code of Conduct

Our reputation depends not only on our own actions but equally on those organisations we work with. Cleanaway's supply chains span multiple industries and regions. We partner with organisations who share our objectives of positive social and environmental impact – preferencing to support local businesses through the purchase of goods, resources and services and those who can deliver high circularity, low-carbon solutions.

We take our responsibility seriously and work collaboratively across our company/partners to minimise any social and environmental harms in our operations and supply chain.



Cleanaway's Supplier Code of Conduct outlines the minimum standards of behaviour that Cleanaway expects its suppliers to meet - in the areas of health and safety, the environment, labour and human rights, and responsible business practices.

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

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.

Suppliers are expected to read, understand and ensure that their business and supply chain meet these standards. Suppliers must communicate this Code to related entities. A suppliers own suppliers and subcontractors who support in supplying to Cleanaway, must be aware of, understand and comply with this Code. The ability of a supplier 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.

Health & safety

At Cleanaway, people, safety, and the environment are the foundation on which we operate.

We believe that achieving the highest standards of health, safety and environment is critical for the success and sustainability of our business. It also helps to give our customers, communities, shareholders, and regulators confidence in our capability. We do this through excellence in managing risk and compliance obligations, enabled by fit-for-purpose systems and processes.

It's our belief that every workplace incident, injury and illness can be prevented, and that everyone deserves to go home safely.

The role of our suppliers is crucial to our business and we are dedicated to ensuring the safety of everyone involved, including our workers, customers, and the community.

All Cleanaway key suppliers need policies and programs that promote a safe, healthy, and secure workplace, as well as compliance with all applicable laws and regulations.

Suppliers undertaking work at Cleanaway operated sites must:

- Meet the requirements of our Lifesaving Rules, which include ensuring critical risk controls are in place.
- Carry out work in accordance with Cleanaway's safety policies, processes and procedures.
- Be accountable for own safety, and that of others.
- Stop working if your safety or others' is at risk.
- Report any hazards or risks and any incidents that cause injuries or damage.



Environment

The planet has limits, and they are being exceeded. Cleanaway is determined to create a better path forward.

Waste is a valuable resource with extraordinary potential. As one of Australia's leading waste management companies, we look for better, smarter and cleaner ways to divert waste from landfill, whilst working on reducing our own environmental footprint.

We're serious about doing our part to help mitigate climate change and that also means finding opportunities to reduce our carbon footprint, and that of our partners.

In the tightly regulated waste industry, Cleanaway strives to maintain high environmental performance standards throughout all operations. We do this by embedding risk management practices in our work every day.

Our supply chain is subject to strict environmental risk management processes given the nature of our business and regulatory requirements. Suppliers must be compliant with all applicable laws, standards and notices from regulators.

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.

A key part of our central procurement supplier selection process includes evaluating suppliers' capability to manage environmental risks and minimise the adverse impact of their goods and services. Suppliers who take proactive steps to manage the environmental impacts of their goods and services will be viewed favourably.



Responsible business

LABOUR & HUMAN RIGHTS

We support the Universal Declaration of Human Rights, the International Bill on Human Rights, the United Nations Guiding Principles on Business and Human Rights and the principles concerning fundamental rights set out in the International Labour Organisation's Declaration on the Fundamental Principles and Rights at Work. These principles guide our approach to human rights.

We are committed to respecting and supporting the rights of our employees and to treating all workers reasonably, without discrimination, and in a manner that is respectful of their rights and dignity.



MODERN SLAVERY

It is the responsibility of suppliers to comply with all applicable local laws, including the *Modern Slavery Act 2018 (Cth)*.

Where appropriate, suppliers should take steps to comply with international human rights and modern slavery laws, declarations and any other mandatory human rights, due diligence legislation or modern slavery reporting requirements.

As a minimum, suppliers must:

- Prohibit and refrain from engaging in modern slavery, including forced labour and the worst forms of child labour, in their operations and require their suppliers to do the same.
- Not be convicted of modern slavery-related offences.
- Ensure that employment is freely chosen and workers are free to leave their employment after reasonable notice.
- Take proactive steps to identify and manage modern slavery risks in their operations and supply chains.
- Provide a means for workers to safely and anonymously, make complaints relating to human rights (including labour rights and modern slavery-related complaints). This could be via Cleanaway's whistleblowing service or a suppliers own reporting channels.
- Promptly notify us where any modern slavery risks or incidents are suspected or found in their operations or supply chain, and provide any relevant information requested by us.



Responsible business

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DIVERSITY, EQUITY & INCLUSION

At Cleanaway, we believe a workforce with diverse backgrounds, skills and experience benefit our organisation, our customers and other key stakeholders.

Whether it's a different cultural background or a different way of thinking, we see how our business is stronger with those perspectives being heard.

We remain committed to increasing the diversity of our supply chain by supporting First Nations businesses and social enterprises. Our procurement process favours social enterprises and companies that demonstrate commitment to First Nations engagement.

Cleanaway expects its suppliers to foster a workplace free from any form of bullying, discrimination, or physical, sexual, psychological, verbal harassment or any other form of abuse.

All employees and contractors must be 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.

Our Diversity, Equity and Inclusion Policy Statement sets out our Cleanaway's ongoing activities and cultural commitment.

ANTI-BRIBERY & 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.

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.

Conflicts of interest, whether actual, potential, or perceived, should be declared to us as soon as possible so that appropriate steps can be taken to resolve the conflict(s).

CONFIDENTIAL INFORMATION & PRIVACY

You must respect and maintain the confidentiality of our information

You must not allow our information to be used or disclosed, except as 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.

DATA PRIVACY & SECURITY

We expect our suppliers to work with us to protect the data and systems used by and for Cleanaway.

Our Information Security Policy sets out the standards and requirements for implementing security controls that protect Cleanaway's information assets, including compliance with all legal and regulatory obligations in relation to information security and the protection of personal information. The policy was developed in accordance with the ISO27001:27006 Information Security Management Systems standards.

All Cleanaway staff and suppliers must ensure that confidentiality of information is maintained, such that information is not disclosed to unauthorized persons through deliberate or careless actions, integrity of information is maintained and availability of information to authorized users when needed.

Enforcement provisions

Your compliance with this Code will be monitored, and we reserve the right to verify it.

As part of our audit process, you must cooperate with our request for information, documents, and access to staff, as we may reasonably request. If we identify any deficiencies as part of our assessment, we expect you to work with us in good faith to correct them promptly. This Code does not intend 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 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 recurrence. If we consider that you are both capable and committed to avoiding recurrence, we will usually continue to work with you until and unless there is any repetition.

Our business relationship may be terminated if you continue to fail to comply with our principles and expectations as communicated by us to you.

Reporting misconduct or unethical behaviour

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 third-party service provider which specialises in handling sensitive and confidential reports. Read Our Whistleblower Policy details for how to access this service.



SPEAK UP TO MISCONDUCT

FairCall service available 24/7

Call **1800 500 965**

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.



FURTHER INFORMATION

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.