

SUPPLIER CODE OF CONDUCT

1. INTRODUCTION

AAW Group is committed to fostering a responsible supply chain that upholds the highest standards of integrity, transparency, and ethical business conduct. Our Supplier Code of Conduct serves as a foundational framework and outlines the principles and expectations we have of our suppliers.

2. SCOPE & APPLICATION

This Supplier Code of Conduct applies to all suppliers of goods and services to AAW Group Holdings Pty Ltd (ACN 007 257 865) and/or its related bodies corporate (**Suppliers**). Those related bodies include:

- AAW Global Logistics (Australia) Pty Ltd ACN 668 555 048 (also trading as AAW Project Logistics);
- AAW Bulk Liquid Logistics Pty Ltd ACN 668 554 710;
- AAW Global Logistics (NZ) Limited NZCN 6844333;
- Regional Shipping Services Pty Ltd ACN 087 872 580 (also trading as PIL Logistics Australia);
- Coastalbridge Pty Ltd ACN 668 259 818 (also trading as Coastalbridge Agencies); and
- Hoyer Logistics Australia Pty Ltd ACN 625 946 232 (Joint Venture)

(together with AAW Group Holdings Pty Ltd referred to herein as **AAW Group**).

Applying to all existing and potential Suppliers across various supply chain types and tiers, it is a step towards implementing and achieving a commitment to shared values and responsible business practices.

3. EXPECTATIONS AND REQUIREMENTS:

As a supplier to AAW Group, you must adhere to the following expectations and requirements:

3.1. Legal And Regulatory Compliance

Suppliers must comply with all applicable international, national, and local laws and stay informed about legislative and regulatory changes impacting their services. This includes compliance with industry-specific regulations affecting their operations.

3.2. Ethical Business Practices

Suppliers must conduct business with honesty, integrity, and transparency, strictly prohibiting bribery, corruption, or unethical influence in any dealings. This involves establishing mechanisms to prevent and detect bribery within their organisation.

3.3. Human Rights

Suppliers and their employees must respect the dignity and human rights of all individuals. Discrimination, harassment, and any form of forced or child labour are unacceptable. Suppliers must ensure that their operations align with the principles set forth in international human rights standards. This includes conducting human rights impact assessments and implementing policies to address potential human rights violations.

3.4. Fair Labour Practices

Suppliers must uphold fair labour practices, including, at minimum, compliance with applicable maximum working hours, minimum wages, and legal employment conditions in place in the locations in which they operate. This includes respecting the rights of workers to organise and engage in collective bargaining.

3.5. Elimination of Modern Slavery

Modern slavery is a term that refers to serious illegal labour practices including forced labour, debt-bondage, forced marriage, deceptive recruitment practices, human trafficking, and the worst forms of child labour as defined in Article 3 of the ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour. AAW Group is committed to playing a role in the elimination of modern slavery. AAW Group is a reporting entity under the *Modern Slavery Act (2018)* and is required to report annually on risks of modern slavery in its operations and supply chains, including steps taken to assess and address those risks. As a supplier to AAW you and your supply chains form part of our supply chains for reporting purposes, and AAW is required to assess and address risks of modern slavery. You may be required to provide further information regarding your supply chains, and the steps your business takes in relation to assessing and addressing risks of modern slavery in those supply chains.

Suppliers must conduct a review of their operations and assess and address the risks of modern slavery within their operations. Suppliers must also familiarise themselves with the modern slavery risks in their supply chains and what steps they can take, with reference to the nature of their operations, their size and resources, in order to address and minimise those risks. AAW may require Suppliers to provide information regarding these risk assessments on request.

Suppliers are also required to provide information through the purpose-built risk assessment online platform.

3.6. Anti-Discrimination and Diversity

Suppliers should put in place steps that aim to create an inclusive workplace that is free from discrimination based on race, gender, age, religion, disability, sexual orientation, or any other protected status. Promoting diversity and equal opportunities for all employees is encouraged, including through the establishment of diversity and inclusion programs.

3.7. Health And Safety

Suppliers must prioritise the health and safety of their employees, contractors, and anyone affected by their operations. Compliance with occupational health and safety standards and regulations, conducting regular risk assessments, and implementing emergency response procedures is required.

3.8. Environmental Responsibility

Suppliers should aim to adopt environmentally sustainable practices, including energy efficiency, waste reduction, and responsible sourcing. Compliance with environmental laws and regulations is mandatory where those laws apply, necessitating the establishment of environmental management systems. If and when required, records of environmental impacts e.g. Emissions data must be made available to AAW Group.

3.9. Managing Conflicts of Interest

Suppliers must disclose conflicts of interest to AAW Group promptly, taking measures to manage and mitigate them to ensure fair and unbiased business decisions. This includes implementing a clear process for identifying and addressing conflicts of interest.

Should an employee of a Supplier become a Government official, Suppliers are required to inform AAW Group's Risk and Compliance department of the same promptly in writing by email to compliancedept@ilm.com.au.

3.10. Giving And Receiving Gifts

Suppliers and their employees must not offer, give, or accept gifts, hospitality, or any other favours that could compromise, or be perceived to compromise, the integrity of business relationships. Modest and occasional gifts of nominal value may be acceptable if consistent with local customs and not in violation of applicable laws. This section emphasises the need for transparency and sets clear guidelines on acceptable practices.

3.11. Competition

Suppliers must conduct their business activities in full compliance with all applicable competition laws and regulations. Fair and open competition must be maintained, and anti-competitive practices, including price-fixing, bid rigging, and market allocation, are strictly prohibited.

3.12. Data Protection and Privacy

Suppliers must handle all data, including customer information and personal information, with the utmost confidentiality and care. This involves implementing robust data protection measures and ensuring compliance with data protection and privacy laws, including the retention of all data (digital and otherwise) for the mandatory period of 7 years (unless prohibited by applicable laws).

3.13. Business Continuity Planning

Suppliers must establish Business Continuity Plans and Emergency Planning to mitigate operational disruptions from potential risks. Suppliers must communicate the same in due course to AAW Group to ensure seamless continuity in operations for our customers. To ensure consistent and continuous capability of operations in the event of disruptions, Suppliers are encouraged to submit their Business Continuity Plans or Emergency Planning documents to the operational teams of AAW Group.

4. REPORTING

Suppliers must promptly report any potential or actual violations of this Code of Conduct to AAW Group by email to their AAW Group's contact and the Compliance Department compliancedept@ilm.com.au. Reports by third parties regarding a potential or actual violation of the Code of Conduct by a Supplier can be submitted through our [Whistleblower Policy](#).

5. COMPLIANCE

Suppliers are required to cooperate fully with audits, assessments, and investigations conducted by AAW Group.

6. ENFORCEMENT AND TERMINATION

Non-compliance with this Supplier Code of Conduct may result in corrective action, including a remediation plan, suspension of business activities until compliance is achieved, or termination of the supplier relationship.

AAW Group is focused on continuous improvement, such that it encourages Suppliers to self-report potential or actual breaches with remediation plans to prevent further occurrences. Action taken by AAW Group will be considered on a case-by-case basis, however Suppliers being transparent and proactive in relation to non-compliance will have this taken into account when any decision is made.

7. INDEMNITY

Subject to any limitations of liability applicable in this Supplier Code of Conduct, in any agreement AAW Group may have with the Supplier, the Supplier agrees to indemnify and hold harmless AAW Group and its directors, officers and employees against all claims, damages, costs, expenses or liabilities arising out of or in connection with any breach of the provisions as set out in this Supplier Code of Conduct.

8. CONTINUOUS IMPROVEMENT

We expect our Suppliers to collaborate closely with us to improve operational processes, to ensure continued delivery of high-quality services and develop efficiencies.

9. ADHERENCE TO AAW CODE OF CONDUCT

To ensure adherence to the Supplier Code of Conduct, we expect our Suppliers to use systems that support the implementation of this Code or an equivalent code appropriate to the size, nature, scope of operations of the Supplier, and taking into account the nature of the services they provide to the AAW Group.

10. Acknowledgement

By conducting business with a member of the AAW Group, Suppliers agree to uphold the principles outlined in this Code of Conduct.