

# SUPPLIER CODE OF CONDUCT



NRW Holdings Limited's (NRW) Supplier Code of Conduct (**Code**) outlines the minimum standards and expectations for all suppliers (**Suppliers**) providing goods and/or services to NRW. The Code reflects NRW's high standards of professional conduct and ethics in dealing with our Suppliers. By engaging with NRW, Suppliers agree to uphold the principles detailed below and ensure these standards are maintained throughout their own supply chains.

The following six pillars guide NRW's expectations of its Suppliers:

## 1 HEALTH, SAFETY, ENVIRONMENT AND QUALITY (HSEQ)

- Provide a safe, healthy and inclusive workplace for all workers, contractors and visitors.
- Implement effective safety management systems, education and training, hazard controls and emergency preparedness procedures.
- Drive continuous improvement by implementing preventative measures, reviewing and reporting incidents, and ensuring all applicable HSEQ legal requirements are regularly assessed and upheld.
- Operate in a manner that minimises environmental impact, actively managing waste, emissions, resource use and pollution.
- Ensure that all products and services meet agreed quality standards, specifications and regulatory requirements.
- Maintain robust quality management systems, continuous improvement processes and proactive defect prevention.
- Maintain accurate HSEQ records.
- Promptly notify any incidents that are legally reportable to the required parties/industry bodies.

## 2 CORPORATE GOVERNANCE

- Conduct business with integrity, transparency and high ethical standards.
- Comply with all relevant laws, regulations and industry requirements related to sourcing, procuring, storing, transporting and delivering products and services to NRW's operations.
- Implement controls to prevent fraud, bribery and corruption.
- Operate with responsible business practices throughout the supply chain, including maintaining comprehensive records to support invoicing and contract management, and ensuring third-party adherence to this Code.
- Respect the intellectual property rights of all parties throughout the supply chain.
- Maintain effective mitigation strategies to minimise supply disruptions to NRW's operations.
- Report any actual or suspected breaches of this Code promptly to NRW.

## 3 LOCAL COMMUNITIES AND INDIGENOUS ENGAGEMENT

- Conduct business in a way that respects and supports local communities.
- Minimise disruption to surrounding communities and maintain open, constructive dialogue with stakeholders.
- Consider social and economic impacts in operations and decision-making.
- Where possible, contribute positively through local employment, local procurement and community initiatives.
- Seek opportunities to support Indigenous participation, employment and supplier partnerships.



## 4 SUSTAINABILITY

- Ensure responsible environmental management practices, including the implementation of systems, strategies and plans, in the delivery of goods and services to NRW to mitigate the impact of activities on the environment.
- Proactively manage the safety, wellbeing and development for all workers and the communities in which the Supplier operates.
- Ensure corporate governance and risk management principles are upheld and enacted, including maintaining a suite of policies and procedures to guide and promote a culture of ethical corporate behaviour.
- Provide transparent, accurate and timely reporting that demonstrates compliance with relevant, environmental, social and governance standards when required.

## 5 CONFLICT OF INTEREST

- Establish and maintain appropriate policies, procedures and controls to identify, disclose, manage and record conflicts of interest related to their business activities.
- Declare any situation that raises an actual, potential or perceived conflict of interest related to or in connection with its dealings with NRW.
- Avoid financial, business or other relationships that may compromise the performance of their duties under their business arrangement with NRW.
- Do not offer NRW personnel gifts or benefits, either directly or indirectly, and offers of hospitality will be limited to token offers of basic courtesy; or take any action in order to entice or obtain any unfair or improper advantage.

## 6 ANTI-CORRUPTION, ANTI-COMPETITIVE BEHAVIOUR AND MODERN SLAVERY

- Where required, comply and report in accordance with the Modern Slavery Act 2018 (Cth).
- Ensure processes are in place for identifying and addressing the risk of modern slavery, including forced labour, child labour, human trafficking and debt bondage, within the Suppliers operations and supply chains.
- Guarantee that employment is freely chosen and individuals are treated with dignity and respect, ensuring a workplace free from discrimination or harassment, and comply with all laws governing the collection, use and protection of personal information.
- Maintain transparent labour practices, including fair wages, lawful working hours and freedom of movement.
- Allow workers freedom of association and the right to raise concerns without retaliation.



Jules Pemberton

Chief Executive Officer

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