

SUPPLIER CODE OF CONDUCT

ALPHA HPA LIMITED

ABN 79 106 879 690



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This document publicly states the expectations of Alpha HPA Limited ('Alpha HPA') as set out in the International Bill of Human Rights, the Ten Principles of the UN Global Compact and the ILO Declaration on Fundamental Principles and Rights at Work for business conduct from all suppliers wishing to do business with, or on behalf of, Alpha HPA and its subsidiaries. It should be read in conjunction with our Code of Conduct which applies to all of our employees, officers and directors, and to our partners and suppliers when they are working with us or on our behalf.

We define a 'supplier' as a business or individual that provides goods or services to Alpha HPA and Its subsidiaries and expect suppliers and their sub-contractors to review, understand and comply with this document. Where there are areas of weakness or non-compliance, suppliers are expected to develop and execute a remedial improvement plan (with Alpha's support as necessary) as well as report any material incidents and/or breaches of laws and regulations promptly to Alpha HPA.

We seek to build mutually beneficial working relationships and partnerships with our suppliers through the development and continual improvement of processes and systems that address the expectations of this document and will show preference for those suppliers who are able to demonstrate alignment with these expectations.

1 BUSINESS CONDUCT REQUIREMENTS

Laws and Regulations	The supplier must comply with the letter and, where it is clear, the intent of all laws and regulations relating to their business. This includes understanding laws and regulations relevant to their work and complying with legal requirements of the country where they are working.
Sanctions	The supplier is committed to ensuring full compliance with all financial, trade and economic sanctions laws that apply to its global business and expects its supply chain also to comply with all sanctions laws.
Anti-Bribery & Corruption	The supplier acknowledges they have been provided with Alpha HPA Anti-Bribery-and-Corruption-Policy and that they will meet these requirements.

2 COMMUNITY REQUIREMENTS

Community Interaction	The supplier, and in turn its employees, must treat members of the community with dignity and respect. They must not impact on the health, safety or wellbeing of members of the community by engaging in activities such as threatening behaviour, violence, sexual exploitation or abuse, verbal or psychological harassment or abuse.
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3 ENVIRONMENT REQUIREMENTS

Environment	The supplier acknowledges they have been provided with Alpha HPA Environmental Policy and that they will meet these requirements.
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4 HUMAN RIGHTS REQUIREMENTS

Human Rights	The supplier is expected to respect the human rights of workers and others who may be impacted by its activities including in relation to assessing and addressing the human rights risks and impacts in their operations and supply chain.
Child / Forced or Compulsory Labour	The supplier must not engage in forced, bonded, child or involuntary labour or any other form of modern slavery. The supplier acknowledges they have been provided with Alpha HPA Modern Slavery Policy and that they will meet these requirements.
Freedom of Association	The supplier must recognise the right of workers to form, join or not join unions or other worker organisations for which they must not be discriminated against. Suppliers must also allow workers' representatives to carry out their legitimate representative functions in the workplace.
Health and Safety Policy	The supplier acknowledges they have been provided with Alpha HPA Health and Safety Policy and that they have policies and procedures in place to meet these requirements.
Safety and Health Approach	Alpha HPA seeks to avoid, minimize, mitigate, and/or remediate negative impacts on employees safety and health, and proactively manage risks. Suppliers shall conduct activities in a responsible manner, including meeting all legal requirements (relevant to their scope of work) including but not limited to providing a safe and healthy workplace, regular and relevant training, injury and illness prevention.
Diversity and Inclusion	The supplier must: • provide a work environment in which everyone is treated fairly and cultural, ethnic, religious or other diversity factors such as gender are respected; • offer employment on the basis of merit; • not base decisions regarding employment on attributes unrelated to job performance (including but not limited to, race, colour, gender, religion, personal associations, national origin, age, disability, political beliefs, marital status, sexual orientation and family responsibilities). Decisions relating to suppliers, customers, contractors and other stakeholders must also be based on merit.
Wages and Benefits	For wages and benefits paid for a standard working week, the supplier must satisfy, at minimum, national legal standards. In nation states where no minimum wage legislation exists, or where the minimum wage is lower than a living wage, the supplier must seek to establish a living wage that provides an adequate standard of living for all its employees and their dependants. The supplier must ensure full payment of wages and other entitlements is made to workers in a timely fashion, and at a minimum in accordance with applicable laws, regulations and employment contracts. Amounts may only be deducted or withheld from wages where reasonable and in accordance with applicable laws, regulations and employment contracts.
Treatment of Employees	The supplier must create and maintain an environment that treats all employees with dignity and respect and must not use any threats of violence, sexual exploitation or abuse, verbal or psychological harassment or abuse.
Grievance Processes and Remedy	The supplier is expected to establish and maintain a mechanism to allow workers to raise complaints, and a process to consider, manage and remedy complaints which ensures no retaliation towards complainants.

5 SUPPLY CHAIN REQUIREMENTS

Supply Chain	The supplier must ensure to the maximum extent possible the application of the expectations in this document along their own supply chain and with their own suppliers, making diligent efforts to understand, identify and manage any areas of risk, as well as recording and reporting all credible allegations against it of human rights (including labour) abuses, violations of international human rights laws and standards and/or breaches of laws and regulations promptly to Alpha HPA.
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6 MONITORING AND COMPLIANCE

Suppliers are expected to develop appropriate documentation to demonstrate that they share the values, principles and standards addressed in this Code of Conduct and with respect to all legal requirements.

Alpha HPA reserves the right to:

- review such documentation; and
- perform any assessments or reviews on supplier practices as part of a continuous improvement plan.

Suppliers must monitor their compliance with this Code of Conduct, notify Alpha HPA of any significant breaches, allegations of non-compliance or investigation into non-compliance by authorities.

Suppliers are expected to take reasonable steps to address, remedy and prevent reoccurrence of any breach of this Code of Conduct.

Alpha HPA reserves the right to disqualify any potential supplier or discontinue business relationships with any current supplier which has failed to comply with this Code of Conduct.

7 SHARED COMMITMENT

Suppliers who work with Alpha HPA share our commitments to the principles raised in this document by adopting and promoting the commitments in this document and encouraging their sub-contractors to do the same.

Our Code of Conduct details what we stand for, how we interact with our stakeholders and what they can expect from us. It also provides guidance for employees about Alpha HPA's expectations of them in their day-to-day work. We are committed to fostering an environment that affords appropriate protection from retribution for those employees who wish to make a disclosure or air a concern. We encourage and support suppliers, workers in our supply chain and other stakeholders to report misconduct and unethical behavior through Alpha's whistleblower policy.