



VERIDAPT

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Veridapt Partner Code of Conduct

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1. Introduction

Veridapt recognises that our activities and those of our partners and suppliers (“Partners”) can have wide ranging impacts and that our responsibility extends beyond our own operations and into our supply chain. We are committed to socially and environmentally responsible procurement and have set high standards for the way we do business so our customers know we can be trusted.

In the event that Australian or, where different local, law, regulation, rules or contract conditions impose stricter requirements than this Code, partners must comply with those requirements. Where our standards go further than local laws, we will adhere to our standards in a way that is appropriate.

Our Partner Code of Conduct sets out the minimum standards of behaviour we require of our partners. The Code is applicable to all partners who are expected to cascade these requirements to their own partners and supply chain. We ask our partners to not just comply with the Code, but to use reasonable endeavours to exceed it and promote continual improvement throughout their business operations.

2. People

Partners shall be committed to uphold human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees and any other type of worker.

All partners must comply with applicable international and national laws and standards in relation to labour practices and human rights.

Voluntary Employment

Forced, bonded (including debt bondage) or indentured labour or involuntary prison labour: slavery or trafficking of persons shall not be used. This includes transporting, harbouring, recruiting, transferring or receiving persons by means of threat, force coercion, abduction or fraud for the purpose of labour or service. There shall be no unreasonable restrictions on workers’ freedom of movement including unreasonable restrictions on entering or exiting company-provided facilities. All work must be voluntary, and employees shall be free to terminate their employment in accordance with established laws, regulations, and rules. Employees must not be required to surrender their government issued identification, passports or work permits as a condition of employment.



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Child Labour & Young Workers

The term “child” refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. Child labour should not be used at any level of the supply chain.

Young Workers, those under 18 years of age, shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. Work shall not interfere with their education or be harmful to their mental, social or moral development.

Working Hours

Working hours are not to exceed the maximum set by law, workers shall not be required to work more than 60 hours per 7-day week, including overtime, except in extraordinary business circumstances. Workers shall be allowed at least one day off every seven days. Overtime shall be compensated at the prevailing overtime rates.

Wages and Benefits

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted.

Other deductions for accommodation, meals, transport, or personal protective equipment should not exceed minimum costs.

Humane Treatment

There is to be no harsh or inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers; nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

Freedom of Association and Collective Bargaining

Partners are to respect the rights of workers to associate freely and communicate openly with management regarding working conditions without fear of harassment, intimidation, penalty, interference or reprisal. Partners shall recognise and respect any rights of workers to exercise lawful rights of free association, including joining or not joining any association of their choice. Partners must also respect any legal right of workers to bargain collectively.



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Labour Hire

Workers shall not be required to pay employers' or agents' recruitment fees or other related fees for their employment.

If any such fees are found to have been paid by workers, they must be repaid within 90 days.

As part of the hiring process, migrant workers specifically recruited overseas must be provided with a written employment agreement in their native language that contains a description of terms and conditions of employment prior to the worker departing from his or her country of origin.

Particular attention should be given to the recruitment and treatment of at risk groups, notably migrant workers, refugees and asylum seekers.

Anti-discrimination

Partners shall not discriminate against any worker based on their age, disability, ethnicity, gender, marital status, national origin, political affiliation, race, religion, sexual orientation, or union membership, in hiring and other employment practices such as promotions, rewards and access to training. Workers shall be provided with reasonable accommodation for religious practices. In addition, workers or prospective workers should not be subjected to medical tests or physical exams that could be used in a discriminatory way. Parental and carers leave should be provided for, at a minimum as required by national law.

3. Health and Safety

Every employee has the right to work in a safe and healthy work environment. A safe and healthy work environment also enhances operational performance, increase morale and contributes to employee retention.

All partners must make proper provision for the health and safety of their employees, contractors, visitors and those in the community who may be impacted by their operations. Partners must comply with applicable international and national laws and standards in relation to health and safety management.

Occupational Safety

Partners are required to ensure worker exposure to potential health and safety hazards are controlled in the following order: a) elimination; b) substitution; c) engineering controls; d) administration controls; and e) personal protective equipment. This includes production and other machinery evaluated for safety hazards, as well as worker exposure to chemical and biological agents.

Procedures and process are to be in place to ensure the prevention, management, reporting, classification recording and tracking of occupational injury or illness. Procedures must encourage



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worker reporting, allow for provision of medical treatment, provide mechanisms for investigation and corrective action and facilitate the return of workers to work.

Workers should be encouraged to raise health and safety concerns and be empowered to refuse to work in unsafe conditions.

Emergency Preparedness

Potential emergency situations and events are to be identified and assessed, and their impact minimised by implementing emergency plans and response procedures including: emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans. Such plans and procedures shall focus on minimising harm to life, the environment and property.

Welfare

Partners shall keep their workplace at a comfortable temperature, have adequate lighting and be suitably ventilated. Work sites shall be adequately clean and hygienic and have sanitary food, preparation, storage and eating facilities. There shall be clean drinking water, clean toilet and washing facilities.

Communication & Training

Partners shall provide workers with appropriate and regular workplace health and safety related information and training, including fire training, production safety, and correct use of protective equipment and first aid equipment. Clear safety warning signs, in the primary language of the workers, shall be displayed on relevant equipment and hazardous or toxic substances or objects.

4. Environmental

We recognise that sustainable economic development is dependent upon environmental protection. As such we are committed to continual improvement in our performance, efficient use of natural resources and aspire towards zero harm to the environment.

All partners must comply with applicable international and national laws and standards in relation to environmental management.

Partners should consider a lifecycle approach to minimise the environmental impact of its products and services from creation to disposal.



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Pollution Prevention and Resource Reduction

Partners are to ensure the efficient use of resources, and ensure that waste of all types, including water and energy, are reduced or eliminated at the source or by practices such as maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

Partners are to actively avoid causing environmental damage and/or negative environmental impact through their operations.

Hazardous Materials

Chemicals and other materials posing a hazard if released to the environment are to be identified and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

Partners shall regularly review the use of hazardous substances and substitute them with less hazardous alternatives where reasonably practicable.

Waste Management

Partners shall identify all potential waste streams and ensure processes are in place to manage these in line with the waste hierarchy and all applicable regulations.

Wastewater generated from operations, industrial processes and sanitation facilities are to be characterised, monitored, controlled and treated as required prior to discharge or disposal.

Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterised, monitored, controlled and treated as required prior to discharge.

Packaging and Paper

Partner shall avoid undue and unnecessary use of material and use recycled materials whenever appropriate.

Product Content Restrictions

Partners shall adhere to all applicable laws and regulations and customer requirements regarding prohibition or restriction of specific substances including labelling for recycling and disposal.

Energy Consumption and Greenhouse Gas Emissions

Partners should look for cost effective methods to improve energy efficiency and to minimise their energy consumption and greenhouse gas emissions.



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5. Business Ethics

Veridapt expects the highest standards of ethical conduct in all of its endeavours. Partners are expected to be ethical in every aspect of its business, including relationships, practices, sourcing and operations.

Business Integrity

Veridapt promotes integrity and ethics in all aspects of its activities and does not tolerate any form of corruption, extortion or embezzlement. Partners must have a zero tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement (covering promising, offering, giving or accepting any bribes). Partners must never make or approve an illegal payment to anyone under any circumstances.

No Improper Advantage

Partners must not offer or accept bribes or other means of obtaining undue or improper advantage. This includes offering, authorising, giving or accepting anything of value to Veridapt staff or representatives, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage.

Disclosure of Information

Partners shall disclose all information regarding their labour, health and safety, environment practices, business activities, structure, financial situation and performance in accordance with the applicable laws, regulations and prevailing industry practices. Falsification of records or misrepresentations of conditions or practices in the supply chain are unacceptable.

Conflict of Interest

Partners must make Veridapt aware of any actual or potential conflicts of interest that are relevant to Veridapt's business. For example, the partner shall declare if it believes one of Veridapt employees or contractors has an interest or economic tie to the partner's organisation.

Intellectual Property

Partners shall understand their role as custodians of customer information. Intellectual property rights must be respected, and all use of technology, information and know-how shall be conducted in a manner which does not endanger the intellectual property of Veridapt.

Data Protection and Privacy

Partners are committed to protecting the reasonable privacy expectations of personal information obtained from those they do business with, including partners, customers, consumers and employees.



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Partners must comply with data privacy and confidential information and security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

Partners shall not use or disclose any information belonging to Veridapt, its existing and prospective customers, other partners, employees and other third parties, except as required or authorised in writing by Veridapt.

Protection of Identity and Non-retaliation

Partners shall maintain programs that ensure the confidentiality and protection of employee whistleblowing.

Partners should have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

Compliance

Partners must comply with all applicable local laws and regulations, both in letter and spirit, in all the countries in which they operate. Where this Code goes further than local standards, partners must adhere to the Code in a way that is appropriate.