Supplier Code of Conduct

July 2023

The Keyton Supplier Code of Conduct sets out our expectations and seeks to apply our values in partnership with our third-party suppliers, consultants and contractors.

In accordance with contractual arrangements with our third-party suppliers, consultants and contractors (Suppliers), Suppliers are, at a minimum, obliged to comply with the laws and regulations of the jurisdiction/s in which they operate, including laws relating to health and safety, sustainability and the environment, labour practices, modern slavery, materials quality, anti-trust and anti-corruption and data protection.

Suppliers to Keyton are also expected to:

- have read and understood, and will act consistently with this Supplier Code of Conduct (Supplier Code) throughout their operations and apply it in their dealings with Keyton;

- take reasonable steps to communicate this Supplier Code to all employees, subcontractors, agents, suppliers or other third parties in their own supply chains with whom they engage in the performance of services or the supply of goods to Keyton (Supply Chain);

- use reasonable endeavours to ensure Suppliers' own Supply Chains also act consistently with this Supplier Code;

- conduct business fairly, equitably and in a professional manner with the utmost integrity; and

- declare any conflict or perceived conflict of interest they may have with Keyton.

The commitment of our Suppliers to the principles of this Supplier Code will be considered as part of the process when making procurement decisions and building relationships with our Suppliers.

Suppliers must comply with all obligations in any contract that they have with Keyton. Where those terms are more onerous than the standards under this Supplier Code, Suppliers shall adhere to those contract terms.

Health and Safety

We believe in putting people's safety and wellbeing first, and expect our Suppliers to:

- understand and adhere to any Keyton environment, health and safety directives and site requirements whilst attending any Keyton villages, worksites or premises;

- take steps to proactively assess 'What's the worst that could happen?' scenarios and apply controls to eliminate or mitigate the risk of incident and injury;

- adhere to Keyton's Global Minimum Requirements (GMRs) for environment, health and safety on all Keyton projects;

- understand and follow any Keyton health and safety directives and site requirements whilst attending any Keyton villages, worksite or premises;

- speak up and stop any tasks or items of work that are, or could become, unsafe and provide adequate numbers of competent supervisors; and

- not allow a worker to undertake work when the worker's job performance is impaired by drugs (legal or illegal), alcohol or other substances, and report any incidents occurring at a village, worksite or premises to the Keyton team.

Sustainability

Keyton aims to work with our Suppliers to promote sustainable economic growth, vibrant and resilient communities, a healthy planet and healthy people, and Keyton has a long-term aspiration to minimise waste and be powered by clean energy.

Keyton encourages Suppliers to offer sustainable alternatives when providing goods and services to deliver more sustainable outcomes.

Suppliers are expected to:

- strive to reduce environmental harm, to the extent reasonably practicable and appropriate, by maximising the efficient use of natural resources, energy, water and raw materials and minimise pollution (including greenhouse gases pollution) and waste;

- where relevant, implement and maintain a written environmental policy which meets or exceeds the guidelines for such policies as set out in ISO14001:2015, and where required, observe recognised sustainability accreditations;

- take reasonable steps to educate their Supply Chains on the lifecycle of products and materials sourced and on ways to reduce their environmental footprint; and

- co-operate with Keyton to measure and track the sustainability performance of goods and services supplied to Keyton.

Modern Slavery

Modern slavery describes situations where victims are exploited, with their freedom undermined or deprived, through coercion, threats, or deception. Eight types of exploitation are encompassed by the term including:

1. Trafficking in persons

2. Slavery

3. Servitude

4. Forced marriage

5. Forced labour

6. Debt bondage

7. Deceptive recruitment practices

8. Child labour.

Suppliers are expected to:

- take all reasonable steps to source labour, products, services and materials from sources free of modern slavery;

- promote education and awareness of modern slavery risks within their own operations, and collaborate with Keyton to manage modern slavery risks within their Supply Chains;

- take reasonable steps to work with their Supply Chains to implement measures to assess, minimise and address modern slavery risks and encourage greater sourcing transparency; and

- upon reasonable request by Keyton, provide to Keyton traceability data and other relevant information regarding modern slavery risks in their operations and Supply Chains.

First Nations Suppliers and Social Procurement

Keyton works across many locations and we honour our responsibility to listen, learn and walk alongside First Nations peoples to ensure the work we do supports their connection to land, waters, cultures, languages and traditions.

Suppliers are expected to:

- respect the traditions, cultures and laws of the communities in which we operate;

- where appropriate and practicable, share our commitment in supporting programs and initiatives that encourage supplier diversity and community investment;

- preference local suppliers and resources on Keyton projects where reasonably practicable; and

- where appropriate and practicable, keep records of resources and time spent delivering community benefit and social value activities in conjunction with Keyton and, on reasonable request, provide this data to Keyton.

Quality, Products and Materials

Keyton is committed to utilising quality products and materials to create and maintain our villages.

- Suppliers are expected to:

- ensure all products and materials used in Keyton projects meet all applicable laws and standards and comply with the manufacturers' specifications for testing and installation;

- adopt a systematic approach to product integrity, ensuring specified products are not substituted without relevant written approvals, meeting specific quality requirements and minimising the risks of non-conforming work; and

- produce, upon reasonable request, evidence of all required certifications and traceability of products utilised.

Anti-Corruption and Anti-Trust

Keyton is committed to ensuring compliance with anti-corruption and anti-trust laws.

Suppliers are expected to:

- not attempt to bias a decision or gain a business or commercial advantage for Keyton's benefit, or from Keyton employees, directly or indirectly, by promising, giving, requesting or agreeing to receive or accept bribes or facilitation payments including a kickback, favour, cash, gratuity, inappropriate level of entertainment or anything of an inappropriate value;

- not offer, promise or give to any Keyton employee a kickback, favour, cash, gratuity, inappropriate level of entertainment, or anything of an inappropriate value with the purpose of obtaining favourable treatment from Keyton;

- preserve and promote free competition in all undertakings, and not conceal or fail to report any indication of improper payments, and not engage in anti-competitive practices such as price fixing schemes, misleading or deceptive conduct, misuse of market power or bid rigging arrangements; and

- take reasonable steps to have appropriate policies and procedures in place designed to prevent corruption, bribery or anti-competitive behaviour and money laundering.

Data Protection, Privacy, Confidentiality and Cyber Security

Keyton collects, uses, discloses and retains personal information and commercial in confidence information (Keyton Sensitive Information) to the extent necessary to meet its business requirements, and as permitted by law and contractual arrangements in the jurisdictions in which we operate.

Suppliers are expected to:

- use reasonable safeguards to protect Keyton Sensitive Information against loss, theft, destruction or unauthorised access, use, alteration or disclosure;

- ensure appropriate cyber security measures within their information assets and resources to appropriately manage the risk of internal and external cyber threats;

- unless otherwise agreed with Keyton, not retain Keyton Sensitive Information for longer than is legally required or necessary to perform their obligations to Keyton;

- not access or use Keyton Sensitive Information other than for the legitimate purpose for which it was collected, or, in accordance with a contractual obligation owed to Keyton; and

- inform Keyton of and cooperate with Keyton in relation to any data breach or incident that may impact Keyton Sensitive Information.

Whistleblowing

If a Supplier becomes aware of a circumstance or action that contravenes, or appears to contravene, this Code of Conduct they can lodge a confidential report via Stopline.