

Supplier Code of Conduct (v0.1)

VERSION HISTORY

Rev No.	Date	Revision Description	Approval
1.0	29 April 2022	Creation of new Supplier Code of Conduct following the introduction of the <i>Modern Slavery Act 2018</i> (Cth)	Acting Company Secretary/General Counsel, 29 April 2022

AUTHORISATIONS

Prepared by:	Senior Legal Counsel	29 April 2022
Reviewed by:	Legal, Risk and Compliance Manager	29 April 2022
Approved by:	Acting Company Secretary/General Counsel	29 April 2022
Next review due:	3 years	29 April 2025

CONTACT FOR ENQUIRIES (POLICY OWNER)

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1. Overview and Purpose of Code of Conduct

- (a) This is the Supplier Code of Conduct ('Code') for Aurora Energy Pty Ltd (ABN 85 082 464 622) ('Aurora Energy').
- (b) Aurora Energy is Tasmania's leading energy retailer, committed to delivering high quality energy solutions for Tasmanians and supporting our local community. Our key business activities include retailing electricity and gas to residential and business customers, providing access to additional energy related products and services, arranging for the provision of metering services and wholesale energy purchasing through the National Electricity Market.
- (c) Aurora Energy is fully aware of the responsibility we bear towards our clients, employees and the communities in which we work and apply a strict set of ethical standards to guide our business dealings.
- (d) The purpose of this Code is to:
 - (i) ensure that each of our suppliers (a 'Supplier') adhere to the same ethical standards; and
 - (ii) prescribe a set of minimum standards for doing business with any Suppliers.

2. Law and ethical standards

The Supplier must comply with all laws applicable to its business. The Supplier should support the principles and rights under the United National Global Compact, the UN Universal Declaration of Human Rights and the 1998 International Labour Organisation Declaration on Fundamental Principles and Rights at Work, including:

- (a) respect for the fundamental rights and freedoms of all people;
- (b) promoting freedom of association and right to collective bargaining;
- (c) eliminating forced or compulsory labour and child labour;
- (d) eliminating discrimination in respect of employment and occupation; and
- (e) adopting sustainable and socially responsible policies in business.

These principles specifically apply to all aspects of human rights and fair labour practices set out below.

3. Application of this Code of Conduct

The Code applies to conduct of all personnel engaged by and undertaking work on behalf of the Supplier in its business, regardless of whether they be casual, short-term or contracted workers or where they may be located.

You are expected to read and familiarise yourself with this Code. Please contact Aurora Energy at Governance@auroraenergy.com.au for further information or if you have any questions on the application of this Code to you.

4. Human rights, modern slavery and fair labour

4.1 Modern Slavery

The *Modern Slavery Act 2018* (Cth) requires all Australian entities or foreign entities carrying on business in Australia that have a consolidated revenue of \$100 million or more, to publicly report on, amongst other things, risks of modern slavery in their operations and supply chains.

Aurora Energy is committed to a zero tolerance approach to all forms of modern slavery practices in its supply chain. Aurora Energy defines modern slavery in accordance with the definition provided in the *Modern Slavery Act 2018* (Cth), that is including:

- (a) slavery;

- (b) servitude;
- (c) forced labour;
- (d) deceptive recruiting;
- (e) forced marriage;
- (f) debt bondage;
- (g) trafficking in persons; and
- (h) the worst forms of child labour.

4.2 Child labour

The Supplier must not employ children under the legal age of employment in any country or local jurisdiction. If the minimum age of employment is not defined, it will be 15 years of age. Workers under the age of 18 must only perform work in accordance with legal requirements (eg with regards to working time, wages and working conditions) and subject to any requirement regarding education or training.

4.3 Forced labour

- (a) The Supplier must not use any form of forced, bonded or involuntary labour. All labour must be voluntary.
- (b) Workers must be allowed to maintain control over their identification documents (e.g. passports, work permits or any other personal legal documents).
- (c) The Supplier must ensure that workers do not pay fees or make any payment or incur any loans or other liabilities connected to obtaining employment throughout the hiring process and the employment period. If any such fee or payment is found to have been paid by a worker, the Supplier will pay an amount equal to the fee or payment to the worker. The Supplier must be responsible for payment of all fees and expenses (eg licences and levies) relating to workers, where legally required.
- (d) Punishment and/or mental or physical coercion are prohibited. Disciplinary policies and procedures must be clearly defined and communicated to the workers.

4.4 Conditions of employment, compensation and working hours

- (a) The Supplier must ensure that employment contracts and conditions are provided in terms and in a language clearly understood by the workers.
- (b) The Supplier must comply with all applicable laws and mandatory industry standards regarding maximum working hours, overtime, fatigue management/days of rest, wages and benefits.
- (c) The Supplier must pay workers in a timely manner and clearly convey the basis on which workers are being paid.
- (d) Deductions from wages as a disciplinary measure must not be allowed, if not legally permitted and even where legally permitted, should be minimised.

4.5 Freedom of association and collective bargaining

- (a) The workers of the Supplier must be free to join or not to join a union/employee representation of their choice, free from threat or intimidation.
- (b) The Supplier recognises and respect the right to collectively bargain in accordance with applicable laws.

4.6 Diversity

- (a) The Supplier must promote an inclusive work environment that values the diversity of its workers.
- (b) The Supplier must not discriminate or tolerate discrimination with respect to gender, race, religion, age, disability, sexual orientation, national origin or any other characteristic protected under applicable laws.

5. Work, Health & Safety

- (a) Aurora Energy expects its Suppliers to strive to implement the standards of occupational health and safety at a high level by applying a health and safety management approach appropriate to its business.
- (b) The Supplier must comply with applicable occupational health and safety regulations and provide a work environment that is safe and conducive to good health, in order to preserve the health of workers, safeguard third parties and prevent accidents, injuries and work-related illness. This includes regular workplace risk assessments and the implementation of adequate hazard control and precautionary measures. Workers are to be adequately educated and trained in health and safety issues.

6. Data protection and disclosure information

- (a) The Supplier must adhere to relevant data protection and security laws and to respective regulations, in particular with regard to personal data of customers, consumers, employees and shareholders. The Supplier must comply with all said requirements when personal data is collected, processed, transmitted used or retained.
- (b) The Supplier must safeguard and make only appropriate use of confidential information. The Supplier must not disclose any information that is not known to the general public.
- (c) The Supplier must accurately record information regarding its business activities, supply chains, workers, health and safety, and environmental practices.

7. Bribery and corruption

- (a) The Supplier must comply with all national and international anti-bribery regulations as well as applicable anti-corruption laws, regulations and standards.
- (b) The Supplier must not (either directly or indirectly) offer or promise to provide anything of value to improperly influence an official or act to secure improper advantage in order to obtain or retain business.

8. Trade regulation, fair competition and insider trading

- (a) The Supplier must comply with all applicable trade and import regulations including sanctions and embargoes that apply to their activities.
- (b) The Supplier must comply with applicable competition and anti-trust laws.
- (c) The Supplier must comply with all applicable laws and regulations concerning insider trading and must not engage in insider trading to the extent the Supplier gains access to non-public information about Aurora Energy, our customers or business partners.

9. Money laundering & financial records

The Supplier must comply with applicable laws and regulations designed to combat money laundering activities. The Supplier must maintain financial records and reports according to international laws and regulations.

10. Conflicts of interest

A conflict of interest arises when an individual has a private/personal interest which could appear to influence their decisions. Such conflict of interest situations include a relationship by blood or marriage, partnership, business relationship business partnership or investment. The Supplier must disclose any actual or potential conflict of interest with Aurora Energy personnel of which it is or becomes aware.

11. Environment

- (a) The Supplier must comply with all applicable environmental laws, regulations and standards as well as implement an effective system to identify and eliminate potential hazards to the environment.

- (b) Aurora Energy expects our Suppliers to strive to support national climate protection goals and initiatives through the products and services they deliver (eg by providing relevant data on climate protection). In this regard we also expect our Suppliers to take climate protection appropriately into account in their own operations, for example by setting climate protection goals for themselves and achieving them.

12. Responsible sourcing of goods and materials

The Supplier must:

- (a) ensure its procurement and sourcing practices are ethical and in accordance with human rights and law;
- (b) develop due diligence policies and management systems in order to identify relevant risks in its supply chains;
- (c) undertake regular due diligence on the goods and materials in the Supplier's supply chains to determine whether goods and materials are sourced from high risk areas associated with child or forced labour, human rights violations and conflict, or are associated with health and safety risks and environmental risks; and
- (d) take appropriate steps to mitigate and manage identified risks.

13. Business continuity planning

The Supplier must be prepared for any disruptions of its business (eg natural disasters, terrorism, software viruses, illness, pandemics, infectious diseases, worker shortages). This preparedness especially includes business continuity and disaster recovery plans to protect both employees as well as the environment as far as possible from the effects of possible disasters that arise within the domain of operations.

14. Business partner dialogue

The Supplier will encourage its own suppliers to adhere to this Code as part of fulfilling their contractual obligations with the Supplier.

15. Community engagement

The Supplier is encouraged to support the social and economic development and contribute to the sustainability of the local communities in which it operates. The Supplier will support Aurora Energy in our community engagement commitments and initiatives.

16. Reporting concerns

Aurora Energy supports and encourages the Supplier's personnel to raise genuine grievances and report any breach or suspected breach of the Supplier Code by the Supplier. The Supplier must protect whistleblower confidentiality for any personnel who raise concerns with Aurora Energy.

Aurora Energy maintains the following confidential email address for reporting such concerns. The confidential email address is managed by the Company Secretary/General Counsel.

Email: whistleblower@auroraenergy.com.au

17. Compliance with the Code

- (a) Aurora Energy reserves the right, upon reasonable notice, to check compliance with the requirements of the Code. Aurora Energy encourages its Suppliers to implement their own binding guidelines for ethical behaviour.

18. Related Policies

- Contract & Supplier Management Policy;
- Modern Slavery Policy; and
- Compliance Policy.