

SUPPLIER CODE OF CONDUCT

Plenary's core business is investing, developing, and managing public infrastructure that delivers a lasting and positive impact to the communities it touches. Our vision is to lead responsible custodianship of public infrastructure in our region.

At Plenary, we are committed to conducting our business activities with strong governance and alignment to international best practices in a manner that is ethical and environmentally and socially responsible. The conduct of our supply chain partners is integral to our capacity to deliver on this commitment.

Plenary's Supplier Code of Conduct (**Code**) is aligned to the four principles of the UN Global Compact, of which we are a member, and sets the minimum standards of behaviour that we expect our supply chain partners to meet regarding Human Rights, Labour, Environment, and Anti-Corruption.

Suppliers are required to ensure that they and their supply chain partners meet the standards set in this Code, as updated from time to time. This Code operates in addition to the provisions of any contract in place between Plenary and the supplier. To the extent of any inconsistency between the contract and this Code, this Code will prevail. References in this Code to "supplier" or "supply chain partner" are intended to apply to all suppliers, including subcontractors engaged under subcontracts with project vehicles in which Plenary holds an interest.

COMPLIANCE WITH THE LAW

Suppliers must comply with all applicable laws and regulations in the jurisdictions in which they operate, including Australia.

HEALTH AND SAFETY

Plenary takes the health and safety of its people, customers, contractors and suppliers very seriously. We require that all partners in our supply chain:

- Comply with all applicable health and safety laws and regulations; and

- Provide a safe and healthy working environment for workers and minimise all forms of health and safety risk.

FAIR OPERATING PRACTICES

Suppliers are required to ensure they have appropriate systems and procedures in place to mitigate against the risk of bribery and corruption in any form, including extortion, kickbacks, facilitation payments and improper private or professional benefits.

Our partners must avoid actual or perceived conflicts of interest with Plenary, its clients and personnel, as well as other project partners, and must not take any action to seek to obtain any unfair or improper advantage.

DIVERSITY AND INCLUSION

Consistent with our Diversity & Inclusion Policy, Plenary expects suppliers to operate their businesses in a way that respects and supports diversity and inclusion, and to promote these principles throughout their supply chain. Organisations which actively foster diversity in their supply chain will be viewed favourably, including those suppliers who set targets and implement initiatives to create opportunities for Indigenous-owned enterprises, minority owned organisations, women-owned and/or led businesses, disability and social enterprises, and particularly those that promote increased participation by the local community in infrastructure projects.

GENDER EQUALITY

Plenary is committed to achieving gender equality in its own organisation and to working with others to achieve gender equality across Australian workplaces. We require supply chain partners employing at least 100 persons in Australia to comply with the *Workplace Gender Equality Act* (Cth). All partners in our supply chain, regardless of their size, are expected to take positive action to progress gender equality within their workforces, including removing gender pay gaps that may exist.

MODERN SLAVERY

Plenary rejects any type of modern slavery practice and requires that our suppliers and sub-contractors monitor, identify and remove any

occurrence of modern slavery in their supply chains including but not limited to forced labour; bonded labour; servitude; slavery; child labour; human trafficking; and deceptive recruitment practices.

Suppliers are required to provide their employees and supply chain partners with access to whistleblower mechanisms.

HUMAN RIGHTS & LABOUR PRACTICES

We require that suppliers respect the human rights of workers set out in the International Bill of Human Rights and respect the fundamental labour rights set by the International Labour Organisation.

Supply chain partners must ensure their workplace is free from bullying, harassment of any kind, mental, physical, or verbal abuse, harsh or inhumane treatment.

Suppliers must not engage in or tolerate discrimination in any form in the conduct of recruitment and employment. We expect that hiring, performance evaluation, promotion and remuneration decisions are made fairly and on the basis of merit.

Suppliers should ensure that freedom of association and the right for collective bargaining for workers is respected.

Suppliers must comply with applicable laws relating to wages and benefits including meeting minimum wage requirements without unauthorised or disciplinary measure deductions and ensuring working hours are not excessive.

ABORIGINAL AND TORRES STRAIT ISLANDER PEOPLES, ORGANISATIONS AND COMMUNITIES

As Plenary continues its formal reconciliation journey, suppliers are expected to work with us to identify and promote opportunities for Aboriginal and Torres Strait Islander peoples and businesses to participate in the supply chain.

Plenary encourages those suppliers who have not done so already to engage with organisations such as Reconciliation Australia and Supply Nation, to progress their journey towards reconciliation and to increase opportunities for Aboriginal and Torres Strait Islander peoples and businesses.

ENVIRONMENT

Plenary is committed to reducing its environmental impact. We are currently working to set public environmental targets for our business, to reduce greenhouse gas emissions and to address other potential environmental impacts including those relating to nature and biodiversity. We expect partners in our supply chain to share this ambition and to support us by:

- Providing us with verified data on greenhouse gas emissions and energy consumption, along with other environmental impacts, for the products and services they supply;
- Having a plan in place to assess and reduce environmental impacts across their operations and product life cycle;
- Collaborating with us on supply chain initiatives regarding decarbonisation;
- Conducting climate change risk assessments and climate change scenario analyses and using the outputs of these to manage climate-related risks; and
- Working with Plenary to identify, prioritise, manage and monitor nature-related dependencies, impacts, risks and opportunities.

CIRCULAR ECONOMY

Suppliers are expected to support Plenary's efforts towards improving resource efficiency and responsible end of product life stewardship by:

- Actively trying to reduce the use of raw materials in their products;
- Providing product alternatives that can be recycled or reused at the end of life;
- Identifying opportunities to develop circular solutions; and
- Wherever possible providing take-back schemes for the products provided to Plenary.

CYBER SECURITY AND BUSINESS CONTINUITY

Our suppliers are expected to have a properly tested, documented and implemented:

- Cyber security incident and breach management plan that responds appropriately to cyber security incidents; and
- Business continuity plan that enables the continuing function of critical business operations in the event of a crisis.

COMPLIANCE WITH THIS CODE

We require partners in our supply chain to promote compliance with the Code in the following ways:

- **Self-assessment:** regular compliance checks against the Code, with prompt reporting of any deficiencies or breaches that are identified and communication regarding rectification;
- **Audit:** providing evidence and confirmation of their compliance with the Code on request by Plenary; and
- **Raising a concern:** if at any time a supplier suspects that another party has failed to comply with its obligations under the Code, reporting that suspicion promptly to Plenary. Concerns may be raised directly with your contact at Plenary, or anonymously via Plenary's whistle blower mechanism, which can be accessed at:
<https://plenary.speakup.report/raiseaconcern>

Plenary's Whistleblower Policy can be accessed at:

<https://plenary.com/anz/whistleblower-policies>

Violations of the Code are taken very seriously by Plenary. We will investigate any suspected violation and take appropriate remedial action, ranging from supporting suppliers to prevent future violations up to contract termination, depending on the circumstances.

SUPPORT AND CAPACITY BUILDING

Plenary has a desire to work as a team with our suppliers. We are committed to supporting our suppliers to meet the requirements set out in this Code through capacity building measures, including working with suppliers to exchange knowledge, promote best practice and to provide training and support to smaller suppliers, where required.

If you have any questions regarding the Code, please raise them with your point of contact at Plenary. If your immediate supply relationship is with a party other than Plenary, please request that your direct contact connects you with the appropriate point of contact at Plenary.