

# Supplier Code of Conduct

## 1. BACKGROUND

Paper Australia Pty Ltd and all its subsidiaries, including Opal Packaging Australia Pty Ltd, (together referred to in this document as **Opal**) are dedicated to conducting their business in accordance with the highest standards of integrity, and using our best endeavours to integrate ethical and socially responsible practices into all aspects of our operations. This Supplier Code of Conduct (the **Code**) embodies our commitment to ensure ethical procurement and implement prudent business practices consistent with all applicable laws and regulations.

While our suppliers are independent entities we recognise that if we work together, we can have a greater impact towards eliminating **modern slavery** which includes eight types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour which include where children are subject to slavery or similar practices, or engaged in hazardous work. Therefore, we expect our suppliers to share the commitments in this Code as they relate to their operations, and to give effect to that commitment by meeting the requirements of the Code and complying with all applicable laws. In the event that a supplier fails to meet one of the requirements of the Code, we expect that supplier to work with us to rectify the situation.

## 2. SCOPE OF THE CODE

This Code applies to all entities, suppliers, contractors and subcontractors working for, and providing goods and services to Opal and its related entities (collectively, **Suppliers**). Suppliers are expected to comply, or use best endeavours to comply, with all aspects of the Code.

## 3. PURPOSE OF THE CODE

The purpose of the Code is to ensure that Suppliers of Opal meet and exceed the requirements of the Code in their efforts to prevent, mitigate and where appropriate remedy modern slavery within their operations and supply chains. Opal encourages compliance beyond the requirements of the Code, an outcome it also strives to achieve in its own business.

## 4. MINIMUM STANDARDS

### 4.1 Free and Voluntary Employment

#### (a) No forced, bonded or compulsory labour

Suppliers must ensure that their employees, contractors and other personnel (collectively, **Workers**) must not be subject to any forced, bonded or involuntary labour, required to lodge deposits or other identity papers with the Supplier, or induced to work by deceptive recruitment practices.

Workers must not have their movement restricted. They must be free to leave their employment without consequence as long as reasonable notice is given, and must be free at all times to leave the workplace without unreasonable consequences.

Suppliers must endeavour to ensure that workers do not work in excess of 48 hours per week and that they are provided with at least one day off for every 7 days. It is essential that when employees do work overtime that they do so voluntarily and are appropriately remunerated.

#### (b) No child labour

Suppliers must comply with the minimum legal working age of the country in question, or the standard set by the International Labour Organisation Convention 138, whichever is higher. Suppliers must also commit to eliminating child labour from their supply chains.

It is important that Suppliers are able to verify the ages of all Workers, and where child labour is identified, commit to a program of remediation.

#### (c) Grievances and remediation

Suppliers must:

- i. Establish and maintain a mechanism by which Workers can make complaints, report non-compliance and raise grievances in relation to their engagement or workplace conditions more generally. There must be no adverse action taken against Workers that arise in any way out of, or in connection with, the use or proposed use of this grievance mechanism, or any other lawful channel of complaint, unless the complaint is vexatious.
- ii. Notify Opal as soon as is reasonably possible after they become aware that modern slavery has occurred or is occurring in their operations or supply chain, or that there is a real and substantial prospect that it has occurred or is occurring.

## 4.2 Respect in the Workplace

### (a) Freedom from discrimination

Suppliers must not engage in or tolerate unlawful discrimination or prejudicial treatment in connection with work.

Conduct that is prohibited includes direct or indirect discrimination in relation to hiring, compensation, access to training, promotion, termination, retirement, or any other decision, based on race, ethnic or national origin, colour, physical features, religion, personal beliefs, age, disability, irrelevant criminal or medical issues, gender, gender identity, status as a parent or carer, marital status, sexual orientation, lawful sexual activity, social class, union membership, industrial activity or political belief or affiliation.

### (b) Freedom from violence and harassment

Suppliers must ensure there is no violence or harassment in the workplace or in connection with it. Violence and harassment constitute a range of unacceptable behaviours and practices that are likely to result in physical, psychological, sexual or economic harm, including gender-based violence and harassment.

## 4.3 Labour Rights and Entitlements

### (a) Workplace safety

- i. Workers must be provided with a safe and hygienic working environment. We expect Suppliers to:
- ii. implement rigorous policies and procedures to minimise the risk of accidents and injuries occurring during the course of work;
- iii. provide training for new or reassigned Workers as well as refresher training on a regular basis;
- iv. ensure that all Workers have access to potable water and hygienic facilities;
- v. manage the welfare of Workers effectively by assigning a senior representative to be responsible for the health and safety of Workers; and
- vi. comply with all applicable laws and regulations that pertain to workplace health and safety, including reporting and due diligence requirements.

### (b) Employment transparency

Prior to their employment, all Workers must be given information they can easily understand with respect to the conditions and wages that govern their engagement.

If any conditions change during the course of employment, Workers must be informed in a similar manner. This information must disclose:

- i. The exact legal nature of the engagement, including whether it is a standard employment relationship and whether it is casual, fixed-term or on-going.
- ii. The minimum legal entitlements enjoyed by the Worker.
- iii. Any additional entitlements owing under the specific contract.

To the extent possible, the work performed by Workers should be on the basis of a recognised employment relationship established through national law.

(c) Minimum entitlements

At all times, Workers must be paid at least:

- i. the local minimum wage payable to the particular worker; or
- ii. the minimum wage prescribed by applicable international labour standards, whichever is higher.

Suppliers agree to provide Workers with all entitlements to which they are legally entitled.

(d) Freedom of association and collective action

All Workers must have the right to associate and organise freely, and to join or form trade unions where permitted by law.

There should be no interference with legitimate representative functions and collective action. In jurisdictions where unionisation is restricted by law, we expect Suppliers to allow alternative mechanisms for workers to organise.

In all situations Suppliers should have a mechanism in place that enables Workers to approach management on issues of concern confidentially, either by themselves or through representatives.

#### 4.4 Integrity and Anti-Corruption

Opal expects Suppliers to:

- i. not engage in any corrupt, unethical, improper or illegal conduct;
- ii. maintain appropriate measures to prevent, detect and manage the occurrence of bribery and corruption by any person to whom this Code applies; and
- iii. at a minimum, comply with all applicable laws and regulations.

Specifically prohibited are bribes as well as improper favours, payments and benefits of any sort (whether in cash or in kind) that might influence the outcome of a decision, whether directly or indirectly, relating to Opal's or the Supplier's business.

For example, 'kick-backs' to public officers, 'facilitation payments' made to associates of Ministers, and improper 'commissions' offered to directors of a company are prohibited.

#### 4.5 *Trade Control Laws*

Suppliers must comply with all international trade laws and trade and financial restrictions implemented by nations and international organisations such as the European Union and the United Nations of the countries in which it and Opal operates.

Suppliers must not undertake any business activity with a party that is sanctioned or owned by or operating from a sanctioned country, territory or region.

#### 4.6 *Environmental Sustainability*

Suppliers must make every effort to ensure that, as a minimum, they comply with all applicable laws, regulations, codes and policies relating to the environmental impact of their operations, and maintain procedures to notify local authorities in the event of an environmental accident.

We expect all Suppliers to have an environmental policy or standard that seeks to appreciate and manage impacts on the environment utilising industry best practices.

### 5. **Code Review**

This Code will be reviewed from time to time as may be required having regard to changes in law, corporate governance expectations and the circumstances of the Opal group.