

# GMS – Supplier Code of Conduct



Incorporating Anti-Slavery Policy

Version 1 | June 2023

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## 1 OVERVIEW OF THE CODE

This Supplier Code of Conduct is a set of principles, policies, and procedures that governs the behaviour and performance of Grange Resources' suppliers, and sub-contractors, and Grange's Related Bodies Corporate. Reference to Grange in this document includes Grange's related Body Corporate.

You as Grange's suppliers and sub-contractors should be familiar with the Code and must comply with all relevant contractual obligations, laws and policy and procedures governing Grange's activities. This Code cannot describe every situation, law or rules that may apply to you; however, it provides the framework, and you are still required to exercise good judgement.

We expect you to work safely, always act with fairness, integrity, trust, and respect in accordance with our core values and the policies and procedures made available to you.

You must:

- promptly raise known, or suspected, breaches of the Code, our rules and/or the applicable law
- cooperate in investigations of a possible breach of this Code
- not retaliate against another person for reporting actual or suspected breaches of the Codes.

You can informally raise known or suspected breaches of the Code with your supervisor/managers in the first instance, or formally reporting to Grange by calling (03) 6430 0222 (in Australia) or emailing [info@grangeresources.com.au](mailto:info@grangeresources.com.au)

## 2 HEALTH AND SAFETY

*We are committed to an environment where work activities to be carried out safely, and where the risks to health, safety and welfare of our employees, suppliers, sub-contractors, authorised visitors, and anyone else who may be affected by our operations can be eliminated or mitigated so far as is reasonably practicable*

You must:

- comply with all our policies and procedures, including our occupational health and safety policies, be observant of safety issues and comply with safe practices, and
- put safety first and have procedures or safety management plan in place to prevent, control, track and report all inquiries, occupational illness, and safety incidents.

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### 3 PEOPLE AND LABOUR STANDARDS

*Grange is committed to only doing business with suppliers and sub-contractors who are fully compliant with labour law and standards*

You must:

- ensure that the payment of remuneration to your employees complies with local laws, regulations, and other relevant standards
- ensure that the right of your employees to freedom of expression and opinion are protected
- manage your workforce in a manner that adheres to reasonable working hours and overtime practices, and
- as reasonably necessary, provide training and development opportunities to your employees.

*Acting with fairness, honesty, and integrity will maintain respect and confidence in Grange and professionalism preserves reputations as individuals and that of Grange*

You must:

- treat all employees, suppliers, sub-contractors, and visitors to the workplace with honesty, respect, and courtesy
- not make promises or unauthorised statement or commitments to employees or other people, third parties or entities on behalf of Grange
- not engage in or tolerate breaches of Grange Code of Ethic and Conduct, or the Law
- demonstrate professionalism in all aspects of providing services including not undermining or bringing Grange's integrity or reputation into dispute, and maintaining professional relationship with third parties, and
- use common sense while on Grange premises and on company business to avoid illegal or dangerous conduct.

*Grange is committed to building a fair, equitably, healthy, and engaging culture where differences are embraced and leveraged and is actively finding ways to support and encourage a diverse and inclusive workplace now, and in the future*

You must:

- ensure all individuals are treated with respect and dignity in accordance with Grange Diversity and Inclusion Policy
- not tolerate or engage in harassment, unlawful discrimination, bullying, vilification, occupational violence, or victimisation of any kind
- report dishonest, unethical, or corrupt behaviour or maladministration, and

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- encourage and support good faith reporting of breaches of this Code without retribution.

#### 4 LAWFUL AND ETHICAL BUSINESS PRACTICES

*We are committed to operate with a high standard of integrity, honesty and good corporate governance and prohibit bribery and corruption in all forms*

You must:

- take all reasonable steps to prevent or specifically prohibit bribery and/corruption in your applicable business operations (including in your supply chain)
- be aware that gifts and hospitality, agency arrangements, political donations and charitable contributions may, in certain circumstances constitute or give the appearance of bribery
- be aware of the Grange Anti-Bribery and Corruption Policy which has reporting and approval for gifts, entertainment or hospitality and political contributions and charitable donations
- ensure all transactions are recorded accurately, and
- ensure transparency in your business dealing and financial reporting.

*Grange is committed to only doing business with suppliers and sub-contractors who are fully compliant with Anti-Slavery laws and standards*

You must:

- operate (including in your supply chains) with the Modern Slavery Act 2018 (Cth) and all other Anti-Slavery laws, industrial instruments and other Grange policies and procedures, and ensure compliance with the Grange Anti-Slavery Policy
- work collaboratively with Grange to identify and manage Modern Slavery risks and develop commercial, actionable, and rights-based solutions, and
- complete and comply with supplier self-assessment questionnaires for modern slavery as issued by Grange.

*We encourage people within Grange who are aware of wrongdoing to speak up and disclose the wrongdoing and ensure individuals can do so safely, securely and with confidence that they will be protected and supported*

You must:

- ensure that all suppliers and sub-contracts are aware of Grange's Whistleblower Policy and their right and obligation under that policy

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*Conflicts of interest can jeopardise confidence in Grange*

A conflict of interest occurs when an individual's private interest interferes, or even appears to interfere – with the interest of Grange. Conflicts of interest can be potential, perceived, or actual.

You must:

- disclose any conflict of interest or potential conflict of interest that affects you as soon as possible
- not take on business or financial or private interests that create, or even appear to create conflict between Grange, the suppliers or sub-contractor's interest
- not accept or offer any gift, reward, or entertainment (including discounts on goods and services) that could create an obligation or expectation that could conflict with the role of any Grange employees, suppliers, and sub-contractors, and
- promptly advise in writing to [grrcommercial@grangeresources.com.au](mailto:grrcommercial@grangeresources.com.au) of any outside activities, financial interests or relationships that may involve you either in actual conflict of interests or the appearance of one.

*Insider Trading is prohibited*

Inside information is information that is not generally available to people who commonly invest in securities and if it was generally available, would (or would be likely to) influence experienced investors in deciding whether or not to subscribe for, purchase or sell Grange securities or securities of another entity.

You must not use inside information to deal in Grange securities or securities of another entity while possessing inside information or communicate inside information to another person knowing (or where the employee or director should reasonably have known) that the other person would or would be likely to use that information to deal in or procure someone else to deal in, securities.

## 5 ENVIRONMENT AND THE COMMUNITY

*We are committed, so far as is reasonably practicable, to ensuring applicable work activities are carried out at our sites with consideration for the environment in which we operate and appreciate and in a manner which is socially responsible*

You must:

- take responsibility for endeavouring to ensure that suppliers and sub-contractors works meet applicable environmental laws and ethical legislation and standards, regulations, and contractual obligations

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- comply with any reasonable directions to meet all relevant environmental and ethical legislation and standards, and
- report relevant environment and community impacts, both positive and negative in accordance with our policies.

## 6 PRIVACY AND CONFIDENTIAL INFORMATION

*Maintenance of privacy and proper use of information (public or personal) is critical to build trust and confidence in Grange*

You must:

- always respect the privacy of people and comply with applicable privacy laws
- protect information and not disclose it for any purpose other than the purpose for which it was collected as required by law and contractual obligations
- collect, store, process, transmit and share information in accordance with contractual obligations and laws and regulations related to privacy and information security
- take measures to prevent threats to computer networks, including cyberattacks from affecting internal and external operations, and
- ensure that all information is not obtained, used, disclosed, or leaked illegally or unfairly.

## 7 USE OF GRANGE ASSETS AND RESOURCES

*Our assets include all documents, equipment, information (in whatever form), programs, techniques, systems, processes, intellectual property, and data (however stored) confidential information, along with any information which employees have access as a result of their work responsibilities.*

You must:

- not take or use our assets for personal gain or personal business, nor allow any other person not employed or authorised by us to use them
- take care of prevent waste, loss, damage, misuse theft or misappropriation of our assets
- be careful where you discuss any confidential information of our and how store it
- respect the assets of others and never knowingly damage or misappropriate the assets of other, irrespective of whether the assets are physical or intangible, and
- not knowingly damage or misappropriate the physical or intangible assets of others.

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## 8 REFERENCE/ ASSOCIATED DOCUMENTS

Document Number	Document Title or Information Source	Location
Version 1, Aug 2020	Grange - Anti-Bribery and Corruption Policy	Grange website
Version 3.1, Nov 2022	Grange - Code of Ethic and Conduct	Grange website
Version 1, Aug 2020	Grange - Anti-Slavery Policy	Grange website
Version 2.1, March 2022	Grange - Whistleblower Policy	Grange website
Version 2.1, Nov 2022	Grange - Diversity and Inclusion Policy	Grange website

## 9 DOCUMENT CONTROL

Version	Date	Description	Author	Approved
Draft 1.0	02.06.23	Draft Supplier Code of Conduct	Piper Alderman	
Draft 1.1	09.06.23	Reviewed and Revised Draft	Kookie Latdavanh	
Draft 1.2	15.06.23	Manager Commercial Review	Ben Saward	
Draft 1.3	23.06.23	Management Review	Management	
Version 1	04.07.23	Supplier Code of Conduct - Final	Grange Website	

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