

# Supplier Code of Conduct

SMS OPERATIONS PTY LTD

SMS Operations Pty Ltd - ABN 25 008 736 543  
Effective 1 July 2022

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Approver:	Supply Chain Manager	Due for review:	01/07/2024	<b>THIS DOCUMENT IS UNCONTROLLED WHEN PRINTED</b>			

## 1. Objective

The Supply Chain Code of Conduct (the **Code**) sets out the minimum ethical expectations of Suppliers and Contractors who work with SMS Operations (ABN 25 008 736 543) trading as Swick Mining Services.

## 2. Scope and Availability

SMS Operations aims to maintain high standards of corporate governance and ethics, and to conduct its business in the open, honest and ethical manner as per SMS Operations Code of Conduct.

SMS Operations has embarked on a journey of continuous improvement with the aim to be recognised as an industry leader in corporate responsibility and therefore actively strives to implement ethical, socially responsible supply chain practices and anti-bribery, corruption, and modern slavery practices. We do this by working closely with our Suppliers and Contractors.

It is expected that Suppliers and Contractors who agree to work with the SMS Operations will meet or exceed the requirements set out in this **Supply Chain Code of Conduct (Code)** and [Human Rights Policy](#).

SMS Operations reserves the right to audit compliance with this Code and cancel business with Suppliers and Contractors who do not meet the minimum expectations set out herein.

This Code shall be applied to all Suppliers and Contractors, and their sub-contractors and sub-suppliers.

## 3. Minimum Expectations

### 3.1. Legal Obligations

- Comply with all applicable local and national laws and regulations.
- Disclose to SMS Operations anything that could impact the Supplier or Contractor's ability to provide goods or services as contracted by SMS Operations

### 3.2. Management Systems

- Implement adequate management systems (policies, plans, accounting and reporting mechanisms).
- Demonstrate senior management commitment to effective and transparent culture of compliance.
- Report safety and environmental performance at the request of SMS Operations

### 3.3. Labour / Workplace Management

- Comply with all relevant local and national laws and regulations (where applicable) with regard to employment practices and benefits.
- Promote diversity and inclusion within your workforce.

### 3.4. Anti-Bribery and Corruption

- Implement adequate policies and procedures for combatting bribery and corruption.
- Maintain a record of bribery and corruption risks relevant to the Supplier or Contractor's business.
- Maintain practices to manage actual or potential conflicts of interest that arise that between the Supplier's or Contractor's employees, relatives or acquaintances, which could potentially influence or appears to influence impartiality as providing goods to services to SMS Operations, or impacting SMS Operations business in any manner.

### 3.5. Human Rights and Modern Slavery Prevention

- Implement adequate policies and procedures relating to maintaining human rights and prevention of modern slavery in their supply chain or operations.
- Maintain a record of modern slavery risks relevant to Supplier or Contractor's business and supply chain.

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- Conduct appropriate and proportionate due diligence on suppliers in your supply chain, particularly when sourcing from high-risk areas.
- Take action to address the modern slavery risks identified.
- SMS Operations may conduct due diligence on Suppliers and Contractors per its Human Rights Policy.

### 3.6. Health and Safety

- Comply with all relevant local national health and safety laws and regulations.
- Maintain a health and safety policy and appropriate health and safety standards.
- Maintain a documented system to identify risks and reduce work-related injury and illness.

### 3.7. Environmental Sustainability

- Comply with any relevant local and national environmental laws and regulations (where applicable), including environmental permits and reporting requirements.
- Maintain an environmental policy and appropriate environmental standards (where applicable).
- Maintain a documented system to identify and reduce environmental risks.
- Support a precautionary approach to environmental challenges and initiatives to promote greater environmental responsibility.

### 3.8. Quality

- Apply appropriate industry processes and improvement in product quality and services around quality, control, supplier selection, continuous measurement, learning and customer feedback.
- Maintain quality control procedures and standards which are understood and adopted through Supplier or Contractor's organisation and the supply chain.

### 3.9. Sub-Suppliers and Sub-Contractors

- Maintain a process to select, monitor and manage sub-suppliers and sub-contractors, including assessing their technical performance, quality practices and accountable sound business practices.
- Applying similar minimum standards to these in this Code in dealings with sub-suppliers and sub-contractors.

### 3.10. Personal Data Protection

- Comply with all relevant local and national laws relating to the privacy and security of personal data, including the Australian Privacy laws and have a process to ensure that Supplier or Contractor's own sub-suppliers, service providers, and sub-contractors, comply with all such Privacy laws.

### 3.11. Trade and Export Control

- Maintaining adequate practices and systems to prevent the use of illegally or unethically sourced materials.
- Take action to prevent counterfeit, fraudulent and suspect items from entering the supply chain.

### 3.12. Fair competition

- Suppliers and Contractors must respect and comply with all applicable competition laws and regulations, including not entering into discussions or agreements with competitors concerning pricing, market sharing or similar activities.

### 3.13. Media and Communications

- Ensure any broad communication (i.e., marketing materials, press releases, or media interviews) regarding or referencing SMS Operations, the Supplier's or Contractor's business relationship with SMS Operations or any DDH1 Group company, are formally approved by SMS Operations prior to publication.

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