POLICY



SUPPLIER CODE OF CONDUCT

PURPOSE & SCOPE

Visy expects all its Suppliers involved in the supply of goods and services to observe the highest standards and conduct business in an ethical and professional manner <u>at all times</u>. Visy suppliers must take reasonable steps to ensure that this Code of Conduct is communicated to, understood by and complied with by its employees, contractors, agents and sub-contractors.

DOCUMENT OWNER

Visy Procurement

REVIEW DATE

Yearly, at the start of the calendar year

POLICY

Visy Suppliers:

- must comply with all applicable laws and regulations in all locations where they conduct business.
 The Supplier (and its directors and owners) is required to refrain from engaging in any criminal activity or participating in bribery, corruption or other prohibited business practices
- must not offer any non-cash gifts / entertainment in excess of normal business practices, cash
 payments or kick-backs to any Visy employee which is likely to influence them to take an improper
 course in the future procurement of goods or services
- must at a minimum comply with all applicable wage and hour laws and regulations, including those
 related to minimum wages and overtime rates, and provide legally mandated benefits including not
 exceeding mandated or prevailing work hours
- must respect the legal rights of employees to join or refrain from joining worker organisations, including trade unions
- must not use at any time any prison, forced or child labour in the manufacture of goods or provision of services to Visy
- must not discriminate in hiring and employment practices on any grounds of race, religion, age, nationality, social or ethnic origin, sexual identity, gender, pregnancy and medical conditions, disability or any other legally determined discrimination
- must provide their employees with a safe and healthy workplace in compliance with all applicable laws and regulations
- must operate in a sustainable manner which is protective of the environment, at a minimum complying with all applicable environmental laws and standards
- must not act, or be perceived to act, in any way which is likely to damage Visy's reputation in the marketplace

POLICY



- must, to the extent permitted by law, have appropriate systems in place through which allegations
 of wrongdoing may be reported, investigated and dealt with
- must take appropriate steps to protect and keep confidential the proprietary information and intellectual property of Visy and only use Visy's confidential information for purposes authorised by Visy.

Visy reserves the right at any time to (i) conduct an audit of (or arrange a third party to audit) the Supplier (and the Supplier agrees to facilitate access to its premises and those of any sub-contractors for this purpose) and/or (ii) request reasonable documentation and/or completion of a questionnaire, to confirm that a Supplier complies with the above obligations. Visy also reserves the right to restrict business or terminate dealings with any suppliers who fail to adhere to this Supplier Code of Conduct, depending on the seriousness and circumstances.