

SUPPLIER CODE OF CONDUCT

1. Purpose

The Chamber of Commerce and Industry of Western Australia Limited's (**CCIWA**) commitment to conducting its business in a legal, honest and ethical manner is absolute. This commitment is critical to achieving CCIWA's strategic goals.

CCIWA expects its suppliers to conduct themselves with high standards of ethics such that they consistently act with integrity and accountability. Ethics is considered to encompass, at a minimum: honesty, integrity, probity, diligence, and fairness. Ethical behaviour also extends to not making improper use of an individual's position or benefiting from practices which may be dishonest, unethical, or unsafe. This should be demonstrated through suppliers' behaviour and actions and supported by appropriate governance arrangements.

These principles are of the utmost importance when establishing and conducting business relationships.

This Supplier Code of Conduct (**Code**) sets the minimum legal and ethical requirements and principles of conduct which CCIWA requires from its suppliers and subcontractors. The Code places a positive duty to take proactive action to prevent and discourage breaches of the Code.

This Code applies to the conduct of all companies that have a direct contractual relationship with CCIWA, as well as the sub-suppliers and subcontractors that provide services or deliver products to such companies for the benefit of CCIWA (collectively **Supplier**).

2. Requirements

CCIWA expects its Suppliers to:

- comply with the minimum requirements set out in this Code;
- develop, maintain and implement policies consistent with this Code; and
- maintain adequate records of compliance with this Code.

CCIWA also encourages its Suppliers to exceed the minimum standards set out in this Code and expects its Suppliers to communicate this Code to their related entities, employees, suppliers and subcontractors so that they are aware of, understand and comply with this Code.

3. Compliance with Laws and Regulations

The Supplier shall be committed to full compliance with applicable laws and regulations. The Code is not intended to replace or override Australian or other laws, but it should always be seen as the minimum requirement and expectation.

4. Expectations of ethical behaviour

4.1 Declare and manage conflicts of interest

CCIWA requires the Supplier to avoid all conflicts of interest that may arise in the performance of work for CCIWA and in the Supplier's related business decisions. Where actual, potential, or perceived conflicts of interest are identified, they must be declared, managed, and recorded appropriately and immediately reported to CCIWA. Where appropriate, CCIWA's written consent must be obtained before proceeding.

4.2 Uphold business integrity

Suppliers must conduct their business with integrity by acting honestly, responsibly, transparently, consistently and holding themselves accountable for their actions. Suppliers are expected to reflect their organisations communicated values and ethics in their actions and behaviours. Suppliers must not engage in conduct or misuse a position with the intention of obtaining an advantage for themselves or for another person, or to cause, or seek to cause, detriment to CCIWA or to any other person.

4.3 Corrupt Conduct Prohibited

All forms of bribery and corruption are prohibited. CCIWA expects its Suppliers to act with absolute integrity when dealing with CCIWA and in their other business dealings.

All Suppliers must:

- Act and conduct their business in an ethical and transparent manner.
- Not engage in fraud, bribery or corrupt conduct, and comply with applicable anti-bribery, anti-corruption and anti-money laundering laws and regulations.
- Not offer or receive improper gifts or other benefits that may affect the outcome of business dealings.
- Not engage in or tolerate association with any criminal organisations or illegal activity.
- Comply with international and applicable local laws and regulations relating to sanctions, export or import and trade controls (if appropriate).
- Have appropriate mechanisms in place to enable instances of inappropriate conduct to be reported confidentially and without fear of reprisal.
- Promptly report any request or demand for financial or other advantage of any kind offered or promised or received in connection their dealings with CCIWA, and any breach of any applicable anti-bribery, anti-corruption or anti-money laundering laws or regulations.

4.4 Protect sensitive, privileged and confidential information

The Supplier must respect and maintain the confidentiality of CCIWA's information. When accessing CCIWA information, Suppliers must ensure they have appropriate systems and processes in place to protect CCIWA's information and dispose of it appropriately.

Suppliers must not use, or seek to use, information gained in connection to working with CCIWA for financial or non-financial gain or for any other purpose other than what the information was provided for. Suppliers must adhere to confidentiality agreements where these exist.

Suppliers must report to CCIWA any unauthorised use or disclosure of CCIWA confidential or proprietary information, including where the Supplier has been given access to CCIWA information in error, as soon as reasonably practicable.

The Supplier must respect and comply with applicable privacy laws.

5. Expectations of corporate governance and business practices

5.1 Demonstrate high standards of professional conduct and corporate citizenship

Suppliers must conduct themselves in a manner that is fair, professional, free from bias and avoids bringing CCIWA into disrepute. Suppliers must exercise due care and responsibility and must not engage in any activities that are illegal, unsafe, exploitative, fraudulent, corrupt, collusive, or otherwise unethical. Suppliers must comply with their competition law obligations and must not engage in collusive and/or anti-competitive conduct.

5.2 Manage risk

Suppliers must develop and maintain appropriate processes to manage the risks associated with their operations. These include, but are not limited to, risks relating to labour and human rights, significant events, health and safety, the environment, security (including, for example, cyber security), ethics, corporate governance, and supply chain risks. Risks should generally be borne by the party best placed to manage them and Suppliers should not inappropriately transfer risks, including down their supply chain.

5.3 Maintain appropriate records

Suppliers should maintain detailed records that accurately record all financial transactions and information regarding their business activities, labour, health and safety and environmental practices in accordance with applicable laws, policies, and procedures. Disclosure of information must be undertaken without falsification or misrepresentation. The Supplier must make relevant records available to CCIWA on reasonable request.

5.4 Undertake and cooperate with audits and assessments

Suppliers should perform periodic evaluations of their facilities and operations, and the facilities and operations of their subcontractors relevant to the contract, and cooperate openly and honestly with any CCIWA audit, assessment, or review.

5.5 Maintain sustainable business practices and minimise environmental impacts

Suppliers should maintain environmentally responsible policies and practices and identify opportunities to incorporate sustainable environmental practices in their operations. This could include but is not limited to: implementing circular economy activities including recycling; minimising the use of substances that may damage the environment and minimising waste; and implementing activities to support the net zero transition including reducing emissions, transitioning to renewable energy, and reducing energy use.

6. Expectations of work, health, safety, and workplace rights

6.1 Manage workplace health, safety and security

Suppliers must comply with all applicable workplace health and safety laws and ensure they are providing healthy, safe, and secure work environments.

Among other things, all Suppliers must:

- Provide a safe and hygienic environment for workers and third parties, by identifying and managing risks, providing appropriate equipment and resources, and ensuring access to appropriate and clean facilities and amenities.
- Provide workers with appropriate training and induction to perform their duties safely and to comply with this Code and all required standards, policies and procedures.

6.2 Act to prevent involuntary labour and human rights abuse

Suppliers must take all reasonable efforts to ensure that they, and organisations in their supply chain, are not causing, contributing to or directly linked to human rights abuses such as coercion, involuntary and underage labour or modern slavery practice (as such terms are defined in the *Modern Slavery Act 2018* (Cth)). This includes undertaking risk assessments to identify the risk of human rights breaches, particularly in vulnerable industries.

All Suppliers must:

- **Human rights** – conduct their activities in a manner that respects human rights and complies with all applicable human rights obligations.
- **No child labour** - comply with international and local obligations relating to the employment of children, including adhering to the minimum legal working age in their jurisdiction (or with the standards set by the International Labour Organisation) and ensure children under the age of 18 are not employed in hazardous work or in work incompatible with their development.
- **No forced labour:**
 - Not engage in the use of forced, bonded or compulsory labour, slavery or human trafficking, the use or threat of physical or other punishment, or the physical, sexual or psychological abuse or inhumane treatment of workers.
 - Respect the freedom of movement of workers and not require the surrender of any identity papers or work permits as a condition of their employment.
 - Not require workers to pay money as a condition of their employment and not require that any recruitment related fees or expenses are paid by the worker.
 - Not tolerate or allow any of the above practices by any Suppliers in its supply chains.
- **No illegal labour** - not use illegal labour and be able to verify the legal entitlement of their workers to work in their country of employment.

6.3 Act to prevent discrimination, harassment and support diversity

Suppliers must treat everyone with respect and without discrimination. Suppliers must not discriminate based on age, disability, ethnicity, sex, marital status, political opinion, race, religion, sexual orientation, gender identity, union membership, or any other status protected by anti-discrimination law, in hiring and other employment practices. Suppliers should have processes in place to support the disclosure and management of bullying and harassment practices. Suppliers are encouraged to look for opportunities to improve gender equality in the workplace and support a diverse and inclusive workforce.

6.4 Respect employee rights

Suppliers are expected to respect the rights and entitlements of their personnel and comply with all relevant workplace legislation. This includes:

- ensuring that their personnel receive their correct entitlements on time including, but not limited to, wages, penalty rates, overtime, allowances, superannuation, leave, and compensation; and
- respecting the rights to freedom of association for employees and contractors, particularly their rights to choose to do or not do any of the following: join unions or other industrial associations, collectively bargain, and engage in lawful industrial activities; and
- provide accessible grievance mechanisms for reporting concerns to labour and human rights, and clear processes for their resolution.

7. Breaches of this Code

If a Supplier, or an entity in the supply chain of a Supplier, is unable to, or fails to, comply with this Code, CCIWA may, without prejudice to any rights it may have under any underlying contract and depending on the nature and extent of the non-compliance, require the Supplier to take such steps as CCIWA considers reasonably necessary to address the impact of, and remediate, the non-compliance. In cases of material non-compliance, CCIWA may exercise available termination rights.

If the Supplier is aware, or suspect, that one of CCIWA's employees, suppliers or subcontractors is acting inappropriately, the Supplier must inform CCIWA, or the Supplier can anonymously contact the confidential CCIWA whistleblower hotline service – details below:

Whistleblowing Service Contact Details	
Phone Hotline	1300 061 503
Email Address	CCIWA@myvault.net.au
Postal Address	Chamber of Commerce and Industry of Western Australia Limited c/Forensic Consulting PO Box 4736 Melbourne VIC 3001

8. Monitoring and Compliance

Suppliers must monitor their compliance with this Code and promptly notify CCIWA of any breaches or allegations of non-compliance. Suppliers must take all reasonable steps to address and remedy any breaches of this Code. No person who reports a suspected breach of this Code in good faith will be disadvantaged by doing so (provided that person is not responsible for or involved in the suspected breach).

CCIWA reserves the right to review compliance with this Code and require its Suppliers to cooperate and provide any information as CCIWA may reasonably require to perform such a review.

May 2026