



# Supplier Code of Conduct

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Qube Holdings Limited

ACN 149 723 053

# Supplier Code of Conduct

## 1. Introduction

Qube Holdings Limited and its subsidiaries (collectively, **Qube**) are committed to conducting ourselves lawfully, responsibly and ethically throughout our supply chain. Although Qube acknowledges its suppliers as independent entities, their business practices may impact Qube's reputation. Thus, it's important suppliers completely understand and follow the standards of conduct detailed in this Code.

The intent of the Supplier Code of Conduct is to share our commitment, values and expectations to our suppliers. Compliance with such laws, standards and principles is a material consideration for us in assessing every aspect of our supplier relationships.

Qube requires its suppliers to conduct their own due diligence to convey their expectations and requirements to their suppliers down the supply chain. It is the supplier's responsibility to achieve and maintain the minimum standards outlined in this Code, and train employees and contracted parties on their consequential rights and responsibilities.

The expectations outlined in the Code are not intended to supersede or alter the Supplier's regulatory and contractual obligations.

[Qube Statement of Values](#)

## 2. Workplace Health and Safety (WHS)

Qube is committed to providing a safe and healthy workplace to conduct its business in a way that helps protect the environment and the communities in which it operates.

Suppliers must:

- ensure the health and safety of their employees and contractors in connection with their work.
- comply with all WHS-related legal responsibilities under applicable legislation of the countries in which they operate.
- provide working conditions that comply with applicable laws and regulations for the health and safety of all workers involved in operations as well as meet any Qube pre-qualification requirements.
- have a documented system to record and reduce work-related injury and illness.
- make available to Qube upon request a health and safety plan that documents the management of risks relating to works being conducted on behalf of Qube.
- ensure that all requested safety, health and environment documentation from contractors and suppliers, is provided in accordance with contract terms and conditions under our due diligence protocols.
- comply with all workers compensation obligations and provide and assist in rehabilitation and return to work initiatives.

[Qube Safety, Health & Sustainability Policy](#)

## 3. Anti-Bribery and Corruption

Honesty and integrity are integral to Qube's principles and the way we conduct business, in accordance with our Anti-Bribery and Anti-Corruption (ABAC) Policy and Code of Conduct and Ethics.

Suppliers must:

- adhere to the highest standard of moral and ethical conduct, to respect local laws relating to bribery, corruption, money laundering, fraud or similar activities (including, where relevant, such as the Australian Criminal Code Act 1995 (Cth), the United States' Foreign Corrupt Practices Act and the United Kingdom's Bribery Act 2010).
- seek to identify and report any conflicts of interest, be it competing personal or professional interests.
- ensure if required by law, that they have legally compliant whistleblowing procedures and that whistleblowers are protected from victimisation.
- suppliers are prohibited from giving or receiving gifts, entertainment or hospitality in contravention of Qube's ABAC Policy. The offering or acceptance of any gifts and entertainment may have an adverse effect on Qube's reputation.

[Qube Anti-Bribery and Anti-Corruption Policy](#)

[Qube Code of Conduct and Ethics](#)

## 4. Labour and Human Rights

Qube acknowledges that all businesses have an obligation to respect internationally recognised human rights and associated principles as defined by the International Bill of Human Rights. More specifically, Qube's operations and its Human Rights Policy are informed by the goals and practices outlined in the UN Guiding Principles on Business and Human Rights (**UN Guiding Principles**).

Suppliers must:

- not engage in or be associated with (either knowingly or where the Supplier should reasonably be expected to know or suspect) any practices that constitute modern slavery as defined by the UN Guiding Principles. This includes forced, compulsory or indentured labour, trafficking in persons, debt bondage and child labour, both within its activities and undertakings, and within its supply chain. Qube requires its suppliers to respect human rights and ensure that they are not complicit in human rights abuses.
- truthfully and accurately complete Qube's Modern Slavery Questionnaire and comply with any follow-up due diligence requests.
- ensure their employees are paid at least the minimum wage required by local law or the prevailing industry wage - when available, whichever is higher, and must provide all legally mandated benefits and entitlements. All work must be voluntary and workers shall be free to leave work or terminate their employment with reasonable notice.
- ensure migrant workers have exactly the same entitlements as local employees. Any commissions and other fees in connection with employment of migrant workers must be covered by the employer. The employer must not require the employee to submit his/her original identification documents. Deposits are not allowed. Workers engaged by a Supplier through an agent or contractor of the Supplier are the responsibility of the Supplier.
- that any recruitment agencies or labour hire companies they engage, particularly relating to overseas workers, do not engage in any of the above practices.

[UN Guiding Principles on Business and Human Rights](#)

[Qube Human Rights Policy](#)

## 5. Freedom of Association

Suppliers must ensure under applicable laws, that workers are allowed to freely associate with other associations, to establish and join (or not join) organisations without interference, discrimination or harassment. They must not be prevented from bargaining collectively, or engaging in any lawful industrial activity.

[UN ICCPR Article 22](#)

[UN Guiding Principles on Business and Human Rights](#)

[Qube Human Rights Policy](#)

## 6. Environment and Sustainability

Qube recognises the importance of minimising environmental impacts and is proactive in measuring and reducing its environmental footprint through own operational activities.

Suppliers are expected to:

- meet all applicable laws and regulations under applicable legislation of the countries in which they operate.
- demonstrate their management of their environmental impacts to minimise them as far as reasonably practicable. These impacts extend to energy and greenhouse gas emissions, water, waste, hazardous materials, air emissions and chemicals.
- establish and maintain processes for data collection, monitoring and reporting environmental performance in accordance with local regulatory requirements.

[Qube Safety, Health & Sustainability Policy](#)

## 7. Diversity and Inclusion

As set out in our Diversity Policy, Qube values diversity and inclusion and strives to achieve and maintain diversity and inclusion in our workplace.

Suppliers must:

- not discriminate on the basis of race, religion, national or ethnic origin or immigrant status, sex, pregnancy or marital status and breastfeeding, age, disability, or sexual orientation, gender identity and intersex status. Such discrimination will not be tolerated by Qube.
- promote equality of opportunity and treatment for all to ensure the elimination of all unlawful discrimination throughout their activities and undertakings.
- respect the importance of the culture, heritage and traditional rights of Indigenous Australians.

[Qube Diversity Policy](#)

## 8. Professional Conduct and Confidentiality

Suppliers must conduct themselves in a manner that is fair, professional and that will not bring Qube into disrepute.

Suppliers must not improperly use any private, confidential or commercially sensitive information in its possession relating to or in connection with its dealings with Qube.

## **9. Conflicts of Interest**

Suppliers must have effective processes in place to prevent a conflict of interest or the appearance of a conflict of interest related to its relationship with Qube. Suppliers must disclose to Qube any relationship or situation that gives or may give rise to a conflict of interest.

## **10. Records-keeping and Assessment**

Suppliers must maintain adequate records that accurately record all financial transactions and information regarding its business activities, labour, health and safety and environmental practices in accordance with applicable laws, policies and procedures. Disclosure of information must be made as reasonably requested by Qube without falsification or misrepresentation.

Under Qube's due diligence protocols, we require our suppliers to complete our Modern Slavery questionnaire to demonstrate that they are taking all necessary measures to identify, prevent and mitigate incidences of modern slavery in their operations and supply chains.

Qube reserves the right to monitor suppliers by either direct or third-party audit to ascertain compliance with our Supplier Code of Conduct. Qube may periodically request documentation and evidence that demonstrates alignment with the Code.

## **11. Review**

Qube's Supplier Code of Conduct is subject to periodic review.

## **12. Reporting Concerns**

Should you have any concerns about compliance with this Code or want to report illegal or unethical activities you can report them (anonymously if desired) via the means specified in Qube's Whistleblower Policy. All concerns will be handled sensitively and confidentially as far as possible in line with the policy.

[Qube Whistleblower Policy](#)