# SUPPLIER CODE OF CONDUCT

PRIMERO

## ABOUT

Primero is committed to transparent, ethical and responsible procurement that delivers value for money, achieves fit for purpose outcomes and upholds integrity, accountability and sustainable business practices. We expect our suppliers to operate in a manner that reflects these principles and supports the achievement of our commitments.

This Supplier Code of Conduct (Supplier Code) outlines the minimum standards and expectations for all suppliers and supplements any contractual arrangements in place.

For the purposes of the Supplier Code, a “supplier” means any third party engaged by Primero to provide goods or services. Primero expects its suppliers to communicate the principles of this Supplier Code throughout their supply chains and, where reasonably practicable, encourage compliance by their suppliers, subcontractors and business partners. Suppliers are also expected to take reasonable steps to identify and manage material risks arising through their suppliers, subcontractors and business partners.

Primero may review supplier adherence to this Supplier Code as part of its onboarding, due diligence and supplier management processes and may take appropriate action, including remediation requirements, suspension or termination of commercial relationships where suppliers do not meet these expectations.

Suppliers must comply with all applicable laws and regulations in the jurisdictions in which they operate as well as any contractual requirements. Suppliers providing goods or services in support of government or Defence contracts are required to comply with any additional security, procurement, information management and contractual requirements applicable to those contracts.

## OUR EXPECTATIONS

The principles set out below describe the standards we expect suppliers to uphold in their operations, business practices and supply chains.

**Health and Safety**

Primero is committed to providing a safe and healthy workplace and preventing physical and psychosocial harm. We expect suppliers to share this commitment by maintaining safe systems of work and actively managing health and safety risks associated with their operations and activities.

Suppliers are expected to:

- Provide a workplace that is safe, healthy and inclusive for all workers, contractors and visitors, where people are empowered to take ownership of their health, wellbeing, and fitness for work.
- Identify hazards and eliminate or minimise risks to physical and psychosocial health arising from work activities.
- Ensure people have the training, skills and equipment to perform their work safely.
- Deliver goods and services that meet agreed requirements and support safe, reliable and fit for purpose outcomes.
- Maintain adequate records and promptly notify Primero of any incidents, regulatory notices, or other events arising from work performed for Primero that may impact people, operations, contractual obligations, legal compliance or reputation.
- Investigate incidents and implement appropriate corrective actions to prevent recurrence.



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## Human Rights

Primero is committed to respecting internationally recognised human rights and promoting fair, ethical and respectful treatment of all people throughout our operations and supply chain. We expect suppliers to uphold these same principles in their business activities and relationships.

Suppliers are expected to:

- Provide a workplace that is free from bullying, harassment, discrimination, victimisation, intimidation and violence where all workers are treated with dignity and respect.
- Prohibit and not knowingly benefit from any form of child labour, forced, bonded or compulsory labour, including human trafficking, slavery, servitude, debt bondage and deceptive recruitment practices.
- Identify, assess and address actual or potential adverse human rights impacts arising from their business activities and relationships, including impacts connected to their supply chains where reasonably practicable.
- Provide fair remuneration and respect workers' rights to freedom of association and collective bargaining, including the right to form and join trade unions where permitted by law.
- Allow workers access to appropriate grievance mechanisms and ensure concerns can be raised without fear of retaliation.

## Environment

Primero is committed to minimising the environmental impacts of our activities and supporting the responsible and sustainable use of natural resources. We expect suppliers to share this commitment by managing environmental risks and seeking opportunities to improve environmental performance.

Suppliers are expected to:

- Identify and manage environmental risks associated with their business activities and the goods and services they provide.
- Minimise adverse environmental impacts through responsible environmental management practices.
- Prevent pollution, reduce waste, and maximise opportunities for resource recovery, reuse and recycling.
- Seek opportunities to continually improve environmental performance through the efficient use of energy, water, materials and natural resources, where reasonably practicable.

## Local Communities and Indigenous Engagement

Primero is committed to creating positive social, economic and cultural outcomes in the communities in which we operate and to engaging respectfully with First Nations and Indigenous Peoples. We expect suppliers to support these objectives through their activities, relationships and decision-making.

Suppliers are expected to:

- Respect the rights, cultures, heritage and connection to Country of First Nations and Indigenous Peoples and consider the interests of local communities in their operations.
- Seek opportunities to support local employment, procurement, skills development and participation, including opportunities for Aboriginal and Torres Strait Islander peoples and other underrepresented groups.
- Identify and manage the impacts of their activities on local communities and cultural heritage.
- Support Primero's community, social procurement and Indigenous engagement objectives where reasonably practicable and relevant to the goods or services provided.



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## Business Integrity and Ethics

Primero is committed to conducting business ethically, transparently and with integrity. We have a zero-tolerance approach to bribery and corruption and expect suppliers to maintain the same high standards in all dealings with Primero and other stakeholders.

Suppliers are expected to:

- Conduct business honestly and ethically in all dealings with Primero and other stakeholders.
- Comply with applicable trade sanctions and export control laws.
- Declare any actual, potential or perceived conflict of interest relating to, or arising in connection with, their dealings with Primero.
- Not engage in, tolerate, facilitate or knowingly benefit from any form of bribery, corruption, fraud, money laundering or facilitation payments.
- Not offer gifts, benefits or other advantages to Primero personnel, directly or indirectly, that could improperly influence, or be perceived to influence, business decisions. Business hospitality must be modest, infrequent and reasonable.
- Maintain complete accurate and auditable books, records and accounts relating to their business activities.
- Comply with applicable competition and anti-trust laws and conduct business in a manner that promotes fair and open competition.

## Information Security and Privacy

Primero is committed to protecting confidential, personal and commercially sensitive information and maintaining the security of our information assets. We expect suppliers to apply appropriate safeguards to protect information and manage security and privacy risks relevant to the goods and services they provide.

Suppliers are expected to:

- Protect confidential, personal and commercially sensitive information.
- Implement appropriate controls to prevent unauthorised access, disclosure, corruption or loss of information.
- Promptly notify Primero of any actual or suspected cyber security or data privacy incidents that may affect Primero and provide information reasonably requested to support Primero’s investigation and response.
- Comply with applicable privacy, data protection and cyber security obligations relevant to the services provided.

## Compliance with this Code

Suppliers are expected to comply with this Supplier Code and provide information reasonably requested by Primero to assess adherence to this Supplier Code. Where a supplier identifies a breach of this Supplier Code, they are expected to promptly disclose the matter to Primero and implement appropriate corrective actions. Suppliers are expected to cooperate with Primero's reasonable due diligence, audit and supplier review activities where relevant to the goods or services provided.

Suppliers are also expected to maintain appropriate risk management, business continuity and insurance arrangements relevant to the nature, scale and risk of the goods and services they provide.



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## RAISING CONCERNS AND SPEAKING UP

Suppliers are expected to report any conduct by Primero personnel, suppliers, or contractors that does not meet the expectations of this Supplier Code or the Code of Conduct Policy. This includes any unethical, improper, or illegal conduct. Primero will not tolerate retaliation against any individual who raises a concern in good faith.

Suppliers can confidentially report conduct via NRW's independent whistleblower service **Your Call**.

Your Call reporting options include:

1. Website: https://www.yourcall.com.au/report
   Available 24/7. Unique identifier code is: "NRW1994"

2. Telephone: 1300 790 228
   Available 9am and 12am (AEST) on recognised Australian national business days

3. National Relay Service: If you are deaf, or have a hearing or speech impairment, you can contact Your Call online or through the National Relay Service. Simply choose your contact method at www.relayservice.gov.au and request Your Call's hotline 1300 790 228.