

### 1. Purpose

Sunwater Limited (Sunwater) recognises the importance of its procurement practices being transparent, responsible, and held to the highest standards of integrity.

We are a major purchaser of a range of goods and services for suppliers, that operate both in regional Queensland and the State as a whole.

It is through this diversity of our procurement portfolio that we accept our responsibility extends beyond the initial purchase of the goods and/or services to the point where the professional conduct and management of our supply chain is a major focus.

We do not adopt the same procurement method in all cases, preferring to instead adopt the approach best suited to each transaction.

The purpose of this document is to clearly and unequivocally establish our expectations of our supply chain and our suppliers that provide their respective goods and services to Sunwater.

### 2. Compliance with Legislation

In addition to any mentioned legislation within this document, we expect our suppliers to comply with all relevant local, State, and Federal laws, regulations, code of practice, and standards (Laws).

### 3. Our Values

Our values and behaviours guide our strategic decisions and daily behaviours and influence how we engage with external stakeholders and the local communities in which we operate.

We expect our suppliers to observe our values and behaviours of:

- We value people:
  - We behave professionally and with honesty, integrity, and treat others with respect.
  - We work to the best of our ability and have the courage to do the right thing.
  - We comply with laws, enterprise agreements, policies, procedures, and management guidelines and frameworks.
- We work together:
  - We know our services and products.
  - We are open and transparent to maintain good working relationships.
  - We keep our team and customers front of mind in all our work.
  - We seek to understand and work constructively to resolve problems.
- We take responsibility:
  - We act responsibly and take accountability for our actions and decisions.
  - We seek information and take an active role to support ourselves and our colleagues through change.
  - We manage real or perceived conflicts of interest.
  - We use our systems, equipment, property, and tools appropriately.

### 5. Health and Safety

At Sunwater, we are committed to a ‘no harm’ culture and believe that all injuries are preventable.

We are committed to undertaking our business in a manner that prevents injury or occupational illness to employees, visitors, contractors, and the public who may be impacted by our work activities. We encourage best practice in health and safety management and process safety. We drive a continuous improvement culture.

The health and safety of people in our workplaces is supported and reinforced in our values and behaviours.

To maintain our commitment to health and safety, we expect our suppliers to:

- actively promote workplace health and safety including protecting and supporting employees’ physical, emotional and mental health, and well-being
- have in place appropriate workplace policies, safe operating procedures, focused training and personal protective equipment (PPE)
- ensure all applicable employees are trained, competent, and licensed for their respective trades, specifically those classified as high risk
- operate and maintain a safety management system in which potential health and safety hazards are reported, assessed, communicated, reviewed, and controlled; and
- abide by all safety processes, procedures, standards, and instructions on Sunwater sites, including alcohol and drug testing, and minimum PPE standards.

### 6. Corporate Governance and Ethics

Sunwater is committed to upholding the highest levels of corporate governance and ethics.

Sunwater’s Code of Conduct sets out the standards and expectations for the way in which we work with each other and our stakeholders at Sunwater. It includes a set of guiding principles to help make decisions in relation to compliance with regulations and laws, treating people respectfully and ethically, managing conflicts of interest, maintaining accurate and proper records, equal employment opportunity and supporting Sunwater’s Whistle-blower Protection Policy.

We also expect our suppliers to exhibit the highest levels of corporate governance and ethical standards and expect that our suppliers will align their behaviours in their business dealings with us to our Code of Conduct.

### 7. Human Rights and Workplace Conditions

Sunwater is committed to developing and fostering a culture in which diversity is valued and providing a workplace that is free from discrimination, harassment, and bullying.

We expect that our suppliers will interact in our business dealings with us with respect, trust, dignity, and fairness.

Sunwater is also committed to working with its employees and business partners to ensure that it has a positive impact on eliminating modern slavery practices in all forms within the local and global community. We expect that our suppliers will also ensure that modern slavery practices are never used in their operations or their respective supply chains and that everyone is treated fairly and with respect, free of violence, harassment or bullying.

## 8. Supplier Diversity Policies

Sunwater supports and encourages supplier diversity by aligning with the Queensland Government's policy of local and indigenous business participation requirements.

Our suppliers are encouraged to develop individual diversity policies, programmes, and business initiatives to support supplier diversity.

## 9. Environmental Management

Environmental sustainability at Sunwater means that when making business decisions, there is due consideration of environmental consequences and opportunities, in conjunction with social and commercial imperatives.

Sunwater's commitment to the environment is to conduct our business in a manner that secures our long-term future and our environmental and social right to operate through a culture of compliance and continuous environmental improvement.

We believe it takes a group effort and commitment to have a long-lasting and positive impact. Therefore, we expect our suppliers to support Sunwater's commitment to environmental sustainability, including but are not limited to:

- reducing pollution and minimising wildlife damage
- proactively managing environmental risks; and
- complying with laws and regulations across all our sites, both operational and corporate.

## 10. Compliance Reporting

Sunwater values business transparency as it fosters trust, strengthens relationships, and enhances business efficiencies.

Business transparency is achieved through the provision of timely, accurate, and value-adding business reports and processes.

To bring business transparency and ensure that compliance requirements are met, we expect our suppliers to have in place the processes to report:

- on the completeness and accuracy of financial and business records
- collection and reporting of energy consumed (including sub-contractors) while working at Sunwater's sites (including, but not limited to the reporting required by the National Greenhouse and Energy Reporting Act 2007 (Cth)); and
- non-compliance with any relevant Laws including but not limited to environment, health and safety, social and economic performance, cyber-attacks and unauthorised access.

## 11. Innovation

Sunwater recognises the need for innovation in response to a rapidly changing market environment.

Innovation to deliver business efficiencies is an important component of our corporate strategy.

We recognise that collaboration with our suppliers and customers is essential to make this happen and we encourage our suppliers to discuss ways of reducing the cost of doing business through more efficient administrative or operational processes with Sunwater.

## 12. Assessments and Reviews of Alignment

Sunwater works closely with its suppliers to ensure they are aligned to this Supplier Code of Conduct, including regular assessments of the practices of its suppliers, which may involve self-assessment by suppliers of their operations.

Periodically, Sunwater may request supporting documentation and may conduct site visits to suppliers to carry out in-depth reviews. Throughout this process, our objective is to work with our suppliers to identify best practice and support improvement.

We expect that our suppliers will:

- respond to all requests for completion of Self-Assessment reviews in a timely manner
- provide open, honest, and complete information
- provide all requested supporting documentation
- support Sunwater in carrying out on-site reviews where required
- complete agreed remedial action plans, where required.

## 13. Reporting Concerns and Reportable Conduct

Sunwater is committed to a culture of transparency and encourages employees, contractors, suppliers, and other service providers to speak up about concerns or reportable conduct.

All information received will be managed securely and confidentially.

Any concerns raised should be directed to:

The Sunwater Whistle blower Hotline can be contacted through 1800 339 276 (toll free), or via the EthicsPoint website. Please note this is a US based website.