Procurement – Supplier Code of Conduct

Mutual Marketplace acknowledges the Traditional Custodians of the land on which we operate, live, and gather as employees and workers, and recognise their continuing connection to land, water, and community. We pay respect to Elders past, present, and emerging.

Mutual Marketplace is committed to ethical, transparent and responsible procurement, and continuously strives to improve the standard of its business practices. We view our Suppliers as an integral part to our business and we care about how our Suppliers manage their operations, as their business practices may impact Mutual Marketplace and its reputation. We expect all our Suppliers to operate in a manner that meets or exceeds the minimum requirements set out in this Supplier Code of Conduct (**Code**).

1. Application of this Code

This Code applies to all procurement activities regardless of their value, and to all Suppliers. Suppliers are expected to read, understand, and ensure their business and supply chain meet the standards set out in this Code, and to communicate the Code to related entities and their own suppliers and subcontractors who support them in supplying to Mutual Marketplace and its customers.

The expectations outlined in this Code are not intended to supersede or alter the Supplier's legislative, regulatory and contractual obligations. Suppliers must check their respective contracts, agreements and purchase orders as they may contain additional obligations or higher standards than those set out in this Code.

Suppliers are expected to proactively self-assess their compliance with the Code and to take action to remedy any non-compliance.

The term '**Supplier**' means any entity that supplies services or deliverables to us or our valued customers. Where the Code refers to workers, it includes employees, contractors, volunteers, agency and temporary staff of the Supplier, and its related entities.

2. Business Governance

Mutual Marketplace maintains sound administration and governance processes and is committed to adequate risk management and corrective action systems, and expects the same from its Suppliers.

2.1 Risk Assessment and Management

Suppliers must develop, implement, and maintain processes to identify, manage and control relevant supply chain risks and risks relating to the protection of personal information, data, labour and human rights, health and safety, the environment, business ethics, and corporate governance by:

- Being able to demonstrate appropriate risk management and governance to ensure compliance with applicable laws and accounting practices;
- Develop and implement emergency plans and response procedures to ensure recovery and continuity of services and deliverables to Mutual Marketplace and its customers in the event of disruption to their services;
- Ensure adequate measures are in place to protect personal information and data of Mutual Marketplace or its customers from loss, misuse, damage, or unauthorised use, disclosure, or modification;
- Ensure adequate measures are in place to avoid infringement of a third party's rights, including intellectual property rights, rights to privacy, and human rights;
- Immediately notify Mutual Marketplace in writing if they become aware of any association with politically exposed persons;
- Maintain appropriate licencing and certifications including insurance, regulatory and industry certifications to meet their obligations to Mutual Marketplace; and
- Provide timely disclosure of material legal, ethical, social, and environmental matters which may adversely impact Mutual Marketplace or its customers.

In all dealings with Mutual Marketplace or its customers, Suppliers must respond to requests for information from Mutual Marketplace or its customers in a timely manner and provide true and accurate records of their operations and supply chains when responding to such requests.

2.2 Compliance with relevant legislation and standards

Suppliers are expected to comply with all relevant legislation and standards, rules and regulations of the jurisdictions in which the Supplier supplies services or deliverables to Mutual Marketplace or its customers.

3. Environmental Expectations

Mutual Marketplace is committed to sustainable business practices, and aims to procure in a way that also protects and advances environmental priorities. Mutual Marketplace expects Suppliers to assist in this by:

- Actively avoiding harming the environment in which they operate;
- Minimising waste and encourage recycling;
- Minimising packaging;
- Reducing and/or offsetting carbon emissions;
- Reducing the use of energy, water or other resources;
- Reducing the use of hazardous and toxic substances and ensuring their correct disposal; and
- Striving to continuously improve environmental and resource management.

4. Ethical Expectations

4.1 Confidential Information and Personal Information

Mutual Marketplace expects Suppliers ensure the adequate treatment of personal information, sensitive information, confidential information, and other data. Information provided or made available to a Supplier by Mutual Marketplace or a customer must not be disclosed to a third party or used for any other reason other than for that which it has been provided or made available, unless express written permission has been given by the owner of such information.

Whenever personal or sensitive information is collected, stored, processed, disclosed, transferred and/or shared, Mutual Marketplace expects its Suppliers to do so in compliance with

applicable laws, any confidentiality agreements and other contractual obligations, and the policies provided by Mutual Marketplace and its customers. Personal or sensitive information must not be disclosed, transferred, or made available outside of Australia without Mutual Marketplace's consent.

4.2 Conflicts of Interest

Suppliers must prevent and avoid any situation that might create a conflict of interest (actual, perceived or potential). Such situations may occur when the private interests of an employee or a representative of the Supplier (or a close relative, friend or associate of an employee or representative) are placed in priority to that of Mutual Marketplace. Suppliers must disclose any actual, potential or perceived conflicts of interest in respect of their dealings with Mutual Marketplace or its customers.

4.3 Ethics and Conduct

We expect Suppliers to:

- Not engage in restrictive trade practices, resale price maintenance, or otherwise act in a manner which may be considered unfair, unconscionable, misleading, or deceptive;
- Produce services and deliverables which meet relevant compliance requirements and any relevant Australian or international standards; and
- Pay their suppliers and subcontractors fairly and on time, in accordance with applicable laws and agreements.

4.4 Social Media

When Suppliers use social media platforms, Suppliers must:

- Be responsible, and courteous and respectful of others;
- Refrain from disrespectful, unprofessional, harassing, defamatory or discriminatory activity on social media platforms;
- Not act or speak on behalf of Mutual Marketplace or its customers, represent themselves as having an affiliation with Mutual Marketplace or its customers or express any views attributable to Mutual Marketplace or its customers unless expressly authorised to do so; and
- Not use Mutual Marketplace's or its customers' brands or logos, except as expressly permitted in writing by Mutual Marketplace or the relevant customers.

4.5 Fraud, Bribery and Corruption

All Suppliers are subject to laws and regulations which prohibit corrupt behaviour such as bribery, embezzlement, money laundering, extortion, and dealing with people, entities, or goods subject to sanctions, trade, or import/export controls. Mutual Marketplace does not tolerate behaviour that is dishonest, illegal, fraudulent, corrupt or unethical. Mutual Marketplace expects Suppliers to:

- Not engage in direct or indirect bribes, kickbacks, or other inappropriate benefits, regardless of value and regardless of local custom;
- Ensure that they do not source services or deliverables from any country, entity or persons subject to internationally-recognised trade sanctions;
- Comply with all applicable laws and regulations relating to sanctions, export, import, and trade controls, including those enacted by the UN and other jurisdictions as appropriate; and
- Avoid offering or receiving gifts, entertainment or travel that could influence, or be seen to influence, their dealings with Mutual Marketplace or its customers.

5. Social Expectations

5.1 Labour and human rights

We expect our Suppliers to:

- Engage in fair employment and engagement practices which are in accordance with the UN Universal Declaration of Human Rights and the International Labour Organisation core conventions;
- Not use modern slavery practices in their operations or supply chain, including human trafficking, forced labour, slavery, servitude, debt bondage, child labour, forced marriage or deceptively recruiting workers for labour or services. Workers must not be required to submit deposits or government-issued identity documents (such as passports) to be held as a condition of employment.
- Allow workers to cease working for a Supplier after providing reasonable notice;
- Allow workers to communicate between themselves and management to resolve issues without fear of reprisal, intimidation, or harassment;
- Allow workers the freedom to associate and to engage in collective bargaining;
- Comply with all local laws and regulations with respect to wages, working hours, benefits, leave entitlements, public holidays, superannuation, and compensation insurance;
- Pay their workers a fair wage which meets basic needs and allows discretionary income;
- Ensure there is no discrimination in hiring, remuneration, access to training, promotion, termination, disciplinary action, or retirement; and
- Ensure that physical abuse, sexual or other harassment, verbal abuse, or other forms of intimidation, or the threat of any of the same, is prohibited.

5.2 Health and Safety Compliance

Suppliers must have processes in place at all venues where services and deliverables are produced and supplied to prevent and minimise health and safety risks, comply with relevant Work Health and Safety laws and policies of Mutual Marketplace and its customers in their operations and supply chain, and ensure that work environments are safe and hygienic.

6. Dealing with Breach and Reporting

6.1 Misconduct, unethical behaviour or suspected corruption

Mutual Marketplace will consider a Supplier's performance in accordance with this Code when making sourcing decisions and in managing our relationships with Suppliers. If a Supplier is unable to demonstrate compliance with this Code or fails to meet minimum requirements, Mutual Marketplace reserves the right to pursue appropriate action, including remediation or ending the business relationship with the Supplier subject to contractual obligations.

Should Suppliers or their workers become aware of any actual or suspected breach of this Code, they can report it anonymously by phoning 1300 030 935 or emailing us at: legal@mmpl.com.au.