



## PEDDERS SUSPENSION & BRAKES SUPPLIER CODE OF CONDUCT

### Overview

Pedders Suspension & Brakes (“**Pedders**”) is committed to ethical, sustainable and socially responsible procurement and we expect the same high standards from those companies which (and people who) supply goods and/or services to Pedders (our “**Suppliers**”).

Pedders views our Suppliers as partners and we care about the way they do business when providing goods and/or services to Pedders.

This “Supplier Code of Conduct” (“**Code**”) details the minimum expectations of our Suppliers in the following 5 areas:

1. Business Integrity;
2. Responsible Sourcing;
3. Labour and Human Rights;
4. Health and Safety; and
5. Environment.

Suppliers to Pedders are advised to review this Code and ensure that relevant areas of their business and supply chain meet our expectations. All references to “**Workers**” in this Code include all employees, contractors, agency and temporary staff of the Supplier and its related entities.

Fundamental to this Code is an expectation that all Suppliers operate in full compliance with all laws, rules, and regulations of the jurisdictions in which they do business. The expectations outlined in this Code are not intended to supersede or alter the Supplier’s regulatory and contractual obligations.

Pedders expects all Suppliers to commit to this Code. Suppliers should check their respective contracts, agreements and purchase orders, as they may contain additional obligations or higher standards than those set out in this Code.

Pedders expects all Suppliers to communicate this Code to their related entities, suppliers and/or subcontractors who support them in supplying goods and services to Pedders, so that they are aware of, understand and comply with this Code.

Pedders may at any time review a Supplier’s compliance with this Code. In such event, the Supplier should co-operate by providing information, documents and access to staff, as Pedders reasonably requires. If a Supplier becomes aware of a reasonable risk of a breach of this Code, the Supplier must notify Pedders in writing within 5 business days.

Where Pedders has reasonable grounds to suspect a breach of this Code by a Supplier, Pedders may require the Supplier to take additional steps which may include the provision



of additional information. Pedders takes this Code seriously and any material non-compliance may result in the termination of the Supplier's business relationship with Pedders.

## **1. Business Integrity**

Pedders expects high standards of ethical conduct and compliance with all applicable laws. Suppliers are expected to be ethical in their business activities, including relationships, practices, sourcing and operations.

### **Anti Bribery and Corruption**

Suppliers and their officers, directors and Workers must adhere to the highest standards of ethical business conduct and must not engage in bribery or corruption in any form, either directly or through third parties.

### **Professional conduct**

Suppliers are expected to conduct themselves in a manner which is fair, professional and will not bring Pedders into disrepute.

### **Confidentiality and Privacy**

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

### **Conflict of interest**

Pedders believes that all business activities should be undertaken with impartiality and any conflict of interest should be raised and managed. Suppliers must declare to their relevant Pedders contact, within 5 business days, any situation that raises an actual, potential, or perceived conflict of interest related to or in connection with its dealings with Pedders.

## **2. Responsible Sourcing**

Suppliers must exercise due diligence to reasonably assure that the minerals they use in their supply chain do not originate from regions associated with armed conflict and do not directly or indirectly finance or benefit groups that are perpetrators of serious human rights abuses.

Suppliers shall exercise due diligence to reasonably assure that the minerals they use in their supply chain are not supplied by businesses or organisations engaged in "**Modern Slavery**", as defined in the Australian Modern Slavery Act (2018).

Pedders has developed a "Responsible Sourcing Policy" ("**RSP**") setting out our core values, with all Suppliers to receive a copy of the RSP. These values are integral to how Pedders



does business and we expect our Suppliers to respect and promote these values in their factories and supply chains throughout the World.

### **3. Labour and Human Rights**

Pedders believes that all Workers in its supply chain deserve to be treated with dignity and respect. Suppliers are expected to provide a fair and ethical workplace, which upholds high standards of human rights and integrates appropriate labour and human rights policies and practices into its business.

#### **Non-discrimination**

Suppliers must not engage in, or support, discrimination in hiring and employment practices, including on grounds of gender, age, religion, ethnicity, race, cultural background, disability, physical features, marital relationship status, sexual orientation, gender identity and expression, pregnancy or potential pregnancy, family responsibilities, political beliefs, industrial activity, union membership, irrelevant criminal record, nor personal association with a person who possesses or is thought to possess any of these attributes.

#### **Bullying, Harassment and Disciplinary Practices**

Suppliers must not use violence, threats of violence or other forms of physical coercion or harassment. Corporal punishment, mental, physical or verbal abuse, sexual harassment or sexual abuse, and harsh or inhumane treatment are all prohibited.

#### **Forced and Compulsory Labour**

Suppliers must not use any form of forced, bonded, compulsory labour, slavery or human trafficking in any part of their business operations. Suppliers must not require Workers to surrender any government issued identification, passport or work permit or other personal document as a condition of employment. Workers shall not be required to pay recruitment fees or any other fee for their employment.

#### **Child and Underage Labour**

Child labour is strictly prohibited. The minimum age for employment or work is the higher of: 15 years of age, the minimum age for employment in the relevant country, or the age for completing compulsory education in the relevant country.

This Code does not prohibit participation in workplace apprenticeship programs, or light work, as defined by the International Labour Organization (“ILO”). Children under the age of 18 must not be employed for any hazardous work, or work that is inconsistent with their individual development.

#### **Working Hours**

Suppliers must not require Workers to exceed prevailing local work hours.



Also, in line with ILO standards, Workers must not be required to work more than 60 hours per week (including overtime), except in extraordinary business circumstances with their consent. Employees must be allowed at least one day off per seven-day week.

### **Wages and Benefits**

Suppliers must make conditions of employment clear when hiring by providing Workers with written documentation which outlines the basic terms and conditions of employment in a language they can understand.

Suppliers must comply with applicable laws relating to wages and benefits, including minimum wages, overtime pay and piece rates. Suppliers must not use deductions from wages as a disciplinary measure and must pay Workers in a timely manner.

### **Modern Slavery Policy**

Pedders has developed a “Modern Slavery Policy” (“MSP”) to reflect our commitment to transparency and accountability for Modern Slavery risks in our supply chain, with all Suppliers to receive a copy of the MSP. Pedders expects the same high standards contained in the MSP from all of our Suppliers.

### **Freedom of association and collective bargaining**

Suppliers are expected to freely allow Workers to associate with others, form and join (or refrain from joining) industrial organisations or associations of their choice and bargain collectively, or engage in any lawful industrial activity without interference, discrimination, retaliation, or harassment.

## **4. Health and Safety**

Suppliers must meet and strive to exceed requirements of applicable health and safety laws and regulations. Suppliers must maintain a clean, healthy, and safe workplace. Any residential facilities must be similarly maintained. Work areas must be of a standard to prevent accidents, injuries and illnesses, and to ensure an adequate level of sanitation.

Suppliers must reduce the potential for injuries and illnesses in the workplace by eliminating or minimising workplace hazards and providing health and safety training to Workers.

## **5. Environment**

Suppliers must comply with all applicable environmental laws and regulations related to their products’ development, manufacturing, and distribution.

Suppliers should strive to continually improve their environmental footprint including the promotion of sustainability initiatives, such as energy and water conservation, pollution prevention, waste minimisation, re-use and recycling practices.