1. PURPOSE & SCOPE

This Supplier Code of Conduct sets out the expectations Neumann Steel has of businesses that want to sell their goods and services to Neumann Steel, and of businesses operating on or on behalf of Neumann Steel sites. It outlines our commitment to ensuring our suppliers and employees are treated fairly and have a framework to work within.

2. APPLICATION

This Supplier Code of Conduct applies to all procurement activities regardless of their value from 1 July 2024.

Neumann Steel reserves the right to do business with suppliers which demonstrate compliance with this Code of Conduct. This is reflected in procurement terms and conditions.

Suppliers are expected to proactively self-assess compliance and take action to remedy any shortcomings.

Neumann Steel may at its discretion request a supplier to demonstrate how they are working to comply with this code of conduct.

Suppliers are also required to comply with all relevant legislation and standards.

3. ETHICAL EXPECTATIONS

We are committed to the highest ethical standards and expect our suppliers to commit to the same.

- **Conflict of Interest**
  Suppliers must ensure that all conflicts of interest (whether actual, reasonably perceived or that could arise in future) are disclosed as soon as possible. This disclosure must occur during all stages of the procurement process when a conflict arises. A copy of the supplier's conflict of interest policy may be requested.
- **Fraud and Corruption**
  Suppliers must not engage in fraudulent or corrupt activities including, for example, bribery or money laundering, or act in any manner which, by association, brings Neumann Steel into disrepute.
- **Demonstrating high standards of conduct**
  You must not engage in fraudulent or corrupt activities or act in any manner which, by association, brings Neumann Steel into disrepute. You also must not act in a manner which involves a misuse of your market power or would be otherwise improper including entering into any collusive arrangements.
- **Intellectual Property**
  Suppliers must ensure all information shared between the parties is held in the strictest confidence and is not shared with any other parties without the written consent of Neumann Steel.
- **Interaction with Employees**
  Suppliers must not attempt to influence procurement decisions via the use of inducements in any form including gifts or benefits or any other means. All interaction with Neumann Steel employees must be conducted in a professional manner with any conflicts dealt with due respect for each party. Aggression and hostility will not be tolerated, and this applies to both suppliers and Neumann Steel employees.
- **Applicable Standards**
  All products and service must comply with the relevant Australian standards associated with them. Deviations will not be accepted unless agreed in writing with Neumann Steel.
- **Subcontractors**

Where a supplier uses sub-contractors, the supplier will ensure that all subcontractors utilised comply to this code of conduct.

Suppliers must also offer payment terms to subcontractors that are no less favourable to those provided to you by Neumann Steel. This also includes complying with the requirements of the Building Industry Fairness (Security of Payment) Act 2017 where applicable.

4. SOCIAL EXPECTATIONS

Neumann Steel is committed to its social responsibility to employees and the communities that we operate in and as such we look to our suppliers to demonstrate similar commitments.

- • **Workplace Health and Safety**
  Suppliers are expected to comply to all workplace health and safety regulations. We actively promote employee wellbeing and operate with a high level of focus on reducing hazards and risk for our working environment and as such we require our suppliers to have similar values towards health and safety. You should regularly manage and review workplace hazards and provide any required training to your employees. This includes proactively engaging with employees, industry bodies and unions.
- **Domestic Violence**
  We oppose all forms of domestic violence. We ask our suppliers to implement initiatives that reinforce a zero tolerance to all forms of domestic or family violence and support this with appropriate policies.
- **Fair Treatment of Employees**
  Neuman Steel are committed to the fair treatment of our employees. We expect that all our suppliers comply to all relevant laws and regulations with regard to the treatment of employees. This includes properly paying employees, giving them their entitlements, not discriminating unlawfully, and committing to workplaces free of harassment.
- **Modern Slavery**
  Neuman Steel is committed to actively participating in the elimination of Modern Slavery. Suppliers to Neuman Steel are requested to demonstrate their commitment to complying with the Modern Slavery Act 2018 (Cth) where applicable. We are actively looking to ensure our supply chain does not support human rights exploitations such as forced or child labour, coercion, or any type of modern slavery practice. Many government organisations are now requesting information of how their customers comply with this act and as such Neumann Steel may request supporting documentation when requested by its customers. Neumann Steel are currently registered with the Attorney General's Department's Modern Slavery Register for reporting.
- **Workplace Diversity**
  We value suppliers that have policies and practices in place to encourage diversity and ensure equal employment opportunity for all people.

  This includes embracing social benefit opportunities such as training and employment opportunities for disadvantaged and marginalised jobseekers.

5. ENVIRONMENTAL EXPECTATIONS

We want to procure in a way that also protects and advances our environmental priorities.

- **Environmental Sustainability**
  We actively pursue improvements to our environmental impacts. We have a number of programs that we are working on to reduce our impact on the environment. We encourage our suppliers to become active in supporting environmental sustainability as we by looking at ways to reduce their environmental impact. Some ways that suppliers can contribute are listed below:-
  - waste minimisation and recycling
  - reducing and/or offsetting carbon emissions
  - using solar or other renewable energy where possible
  - reducing the use of energy, water or other resources
  - reducing the use of hazardous and toxic substances, and ensuring their correct disposal
  - minimising packaging.

  Reporting on environmental sustainability is becoming more of a requirement from Government organisation and as such we may request information on a suppliers Environmental Sustainability strategy and progress to provide to our customers from time to time.

6. HOW TO DEAL WITH SUSPECTED BREACHES OF THIS CODE

In the event of a breach or a concern, suppliers should contact the relevant Neumann Steel procurement manager.

Alternatively, concerns can be raised with the Neumann Steel National Corporate Service Manager :
Emma Schuback
07 5589 9201
Emma.Schuback@Neumann.com.au

In the event of concern about illegal activity, concerns should immediately be referred to the Queensland Police Service.