STEEL MAINS PTY LTD POLICY		
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REVISION No.: 1	**ISSUE DATE: 22/07/2024** **REVIEWED DATE: 16/11/2026**	**APPROVED BY: CFO**
TITLE:	**SUPPLIER CODE OF CONDUCT**	

1 PURPOSE

Steel Mains is dedicated to maintaining a socially responsible and sustainable operations. This Supplier Code of Conduct outlines our values and set expectations for our suppliers.

2 SCOPE

The Supplier Code of Conduct applies to all suppliers of Steel Mains including subcontractors.

3 RESPONSIBLITIES

3.1 Upholding Human Rights

Steel Mains adheres to all the applicable regulation and laws of the Australian Human Rights Commission, and we expect our suppliers (including subcontractors) to respect the human rights of their workforce and ensure fair treatment in accordance with all applicable laws.

Freedom of Association	Suppliers must ensure their employees have the right to freedom of association, including the right to form and join trade unions for the protection of their interests.
No Forced Labour	Suppliers shall not engage in activities which constitute forced or compulsory labour.
No Child Labour	Suppliers must not engage any employees, contractors or subcontractors under the applicable legal working age.
No Discrimination	Suppliers must not discriminate against an individual or group based on race, colour, gender, sexual orientation, age, physical or mental disability, marital status, carers responsibilities, pregnancy, religion, political opinion, social origin, national extraction, breastfeeding, gender identity intersex status.
No Harassment	Suppliers must ensure that no harassment in any of its facets occurs within the workplace, including but not limited to sexual, racial, ethic or religious harassment and harassment on the grounds of disability or age.
Wages and Benefits	Suppliers must pay the legal minimum wage (including overtime and other entitlements) for all employees, or the wages and benefits outlined in an applicable agreement or employment contract (whichever is higher).

3.2 Workplace Health, Safety and the Environment

Steel Mains is committed to maintaining a high standard of sustainable practices to minimise the overall effect on the environment. This is achieved by fostering a safe and healthy workplace and utilising our resources efficiently. We expect our suppliers to conduct due diligence activities aimed to counteract the effects of climate change.

Workplace Safety	Suppliers must uphold the wellbeing, health and safety of their employees in the work workplace. This includes implementing safety measures to prevent injuries and illness among their workforce and the public.
Respecting the Environment	Suppliers shall comply with all applicable environmental laws and regulations. Suppliers are required to have implemented measures to maintain environmental compliance, including licenses, permits and any other industry requirements related to environmental impacts.
Efficient use of resources	Suppliers must ensure that raw materials, energy, and other natural resources are used responsibly and in an environmentally sustainable manner.

3.3 Business Ethics

No Bribery	Suppliers must engage in ethical business dealings practices. Steel Mains will not tolerate any suppliers found to be making, offering, promising, accepting or authorising bribes. This includes the facilitation of payments to government officials. The Supplier must at all times comply with all applicable anti-bribery, anti-corruption, competition, fraud prevention laws.
Conflict of Interest	A "conflict of interest" occurs when an employee of Steel Mains engages with a supplier based on private interests the parties share, which hinders ethical business dealings. Any conflict of interest should immediately be reported to Steel Mains management or Human Resources – in line with the Steel Mains Guide to Ethical Conduct.
Gifts & Business Entertainment	Suppliers shall not offer any excessive gifts, entertainment or favours to Steel Mains employees or anything provided with the aim to alter business decisions.
No Fraud	Suppliers are expected to have the appropriate internal measure in place to detect, prevent and address fraud. Any events of fraud (either potential or actual events) which may influence business decisions Steel Mains, must be disclosed immediately.
Financial Records	Suppliers must retain accurate and up to date records of transactions with Steel Mains and ensure such documents are retained in accordance with legislative requirements.
Privacy and Confidentiality	Suppliers must ensure they have the appropriate controls in place to protect the integrity of Steel Mains data from unauthorised use.
Trade	Suppliers must not engage in any anti-competitive practices. Additionally, suppliers must comply with all relevant rules, regulations and legislation related to international trade. Suppliers must supply all documentation associated with the goods and/or services supplied to Steel Mains. Suppliers must comply with all applicable trade sanctions, export controls, import controls and other trade compliance laws in Australia, New Zealand, U.S., and the jurisdictions where they operate. Suppliers must not provide goods or services that originate from, are supplied through, or involve any country, entity or individual that is subject to applicable trade sanctions or restrictions.

4 NON-CONFORMANCE WITH THE CODE

Any violations of the supplier code of conduct should immediately be reported to Steel Mains (whistleblower@steelmains.com). Suppliers are expected to self-assess their compliance with this Code and take timely action to correct any deficiencies or breaches reported or identified by an audit, assessment, inspection, investigation or review. Suppliers are encouraged to raise any concerns, discuss and seek clarification accordingly to any elements of the Code with Steel Mains. Steel Mains reserves the right to terminate the supplier relationship at any time due to non-compliance with this code.

The Supplier must maintain records sufficient to demonstrate compliance with code and, upon reasonable notice, provide Steel Mains or its nominee with access to such records and other information reasonably required to verify compliance. The Supplier must provide all reasonable assistance in connection with any such audit or verification and promptly rectify any non-compliance identified.

5 SUPPLIER ACKNOWLEDGEMENT

By signing below, you confirm that you have read and understood the Steel Mains Supplier Code of Conduct.

Company Name:	
Representative Name:	
Title/Position:	
Signature:	
Date:	