

SUPPLIER CODE OF CONDUCT

PURPOSE & SCOPE

Visy expects all its Suppliers involved in the supply of goods and services to observe the highest standards and conduct business in an ethical and professional manner at all times.

At Visy, we are guided by our [Values](#); in how we work, how we make decisions and how we treat others. They include: Customer Focus, Relentless Pursuit of Best Value, Acting with Urgency, Passion and Energy for our Business, Safety and Environment, and Encouraging and Developing Excellence in People. Visy's Supplier Code of Conduct supports these values.

Visy is committed to sustainable sourcing practices that support long term value creation. We expect our suppliers to commit to minimising their impact on the environment and assist us in achieving our sustainability ambitions.

We value diversity and inclusion and prefer suppliers who promote diversity in their operations and supply chains.

Visy suppliers must take reasonable steps to ensure that this Code of Conduct (or an equivalent set of principles) is communicated to, understood by and complied with by its employees, contractors, agents and sub-contractors involved in supplying Visy.

DOCUMENT OWNER

Visy Procurement

REVIEW DATE

Yearly, at the start of the calendar year

POLICY

Visy Suppliers:

- must comply with all applicable laws and regulations in all locations where they conduct business. The Supplier (and its directors and owners) is required to refrain from engaging in any criminal activity or participating in bribery, corruption or other prohibited business practices;
- must not offer any non-cash gifts / entertainment in excess of normal business practices, cash payments or kick-backs to any Visy employee which is likely to influence them to take an improper course in the future procurement of goods or services;
- must at a minimum comply with all applicable wage and hour laws and regulations, including those related to minimum wages and overtime rates, and provide legally mandated benefits including not exceeding mandated or prevailing work hours;
- must respect the legal rights of employees to join or refrain from joining worker organisations, including trade unions;
- must support and respect the protection of human rights and comply with laws regarding child labour and only employ workers who are the applicable minimum legal age (the minimum age for employment being the higher of 15 years of age or the minimum age for employment in the relevant country) and must not use at any time any form of slavery, servitude, forced labour, debt bondage, human trafficking, or deceptive recruiting for labour or services;

- must not discriminate in hiring and employment practices on any grounds of race, religion, age, nationality, social or ethnic origin, sexual identity, gender, pregnancy and medical conditions, disability or any other legally determined discrimination;
- must provide their employees with a safe and healthy workplace in compliance with all applicable laws and regulations and have systems, training, and emergency equipment in place to effectively respond to and manage incidents and emergencies;
- must implement controls and initiatives to manage and minimise the environmental impacts from their operations, products and services and comply with all applicable environmental laws and standards including holding any relevant permits and licenses;
- must not act, or be perceived to act, in any way which is likely to damage Visy's reputation in the marketplace;
- must, to the extent permitted by law, have appropriate systems in place through which allegations of wrongdoing may be reported, investigated and dealt with;
- must take appropriate steps to protect and keep confidential the proprietary information and intellectual property of Visy and only use Visy's confidential information for purposes authorised by Visy;
- must comply with all economic and trade sanctions in the jurisdictions in which they operate applicable to their business activities;
- must actively protect the private information, data and networks of Visy, Visy's customers and supply chain, by implementing best practice technical solutions and security measures to protect Visy and our customers and supply chain from privacy, data and cyber breaches, and notify Visy immediately when the Supplier becomes aware of a privacy, data or network breach.

Visy reserves the right at any time to (i) conduct an audit of (or arrange a third party to audit) the Supplier (and the Supplier agrees to facilitate access to its premises and those of any sub-contractors for this purpose) at Visy's reasonable prior written request; and/or (ii) request reasonable documentation and/or completion of a questionnaire, to confirm that a Supplier complies with the above obligations. Visy also reserves the right to restrict business or terminate dealings with any suppliers who fail to adhere to this Supplier Code of Conduct, depending on the seriousness and circumstances.