

## 1. Policy Statement

The purpose of this Policy is to ensure that all the Suppliers/contractors engaged by Adelaide Airport Limited (AAL); Parafield Airport Limited (PAL) or their successors or assignees (together referred to as 'AAL') are made aware of their obligation to meet AAL's expectations of responsible behaviour to their subcontractors and employees. This Policy sets out the Supplier expectations and applies to any supplier of goods and/or services to AAL and includes independent contractors, labour hire providers, and the employees and subcontractors of those suppliers.

All Suppliers of AAL must conduct themselves legally, ethically and with integrity in line with AAL's standards as set out in this policy. AAL expects its suppliers to proactively self-assess compliance to this Code and take action to remedy any shortcomings. We seek suppliers who share our commitment to this Code and if requested can demonstrate that commitment to AAL.

It is AAL's intention that this Policy be incorporated into and form part of each contract that a Supplier enters into with AAL. Accordingly, a material breach of this Policy or repetitive minor breaches of this Policy by a Supplier may result in AAL exercising its legal rights under such contracts. This Policy is not intended to override the terms of any such contract and in the event of inconsistency, the terms of the relevant contract will prevail.

## 2. Policy Objectives

The objective of this Policy is for all Suppliers of AAL to be committed to:

- acting in a socially responsible way;
- continually improving performance and complying with all relevant legislation;
- encouraging staff and subcontractors to be mindful of the effect of their actions on any natural resource; and
- proactively self-assess compliance and take action to remedy any shortcomings.

## 3. Policy Elements

Our procurement is conducted in an environment of integrity, probity and accountability. We are committed to the highest ethical standards and expect our suppliers to commit to the same. AAL requires its Suppliers to comply with the following standards:

### Ethical compliance

AAL is committed to conducting business in an honest and accountable way and maintaining the highest level of corporate ethics. AAL expects its suppliers to engage in ethical business practices and operate in an environment of integrity and accountability. This includes:

- Acting honestly, professionally, and fairly in all dealings with AAL.
- Upholding employees' rights, and conditions.
- Promote diversity and equality of opportunity.

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- Take proactive steps to eliminate discrimination of any kind.
- Ensuring that any conflicts of interest (actual or perceived) are disclosed to AAL as soon as practicable.
- Protecting confidential, private, or sensitive information relating to AAL, and only using such information in accordance with the terms and conditions of any applicable agreements.
- Ensuring goods and services provided to AAL meet relevant compliance requirements and/or national or international standards, where specified, and are safe to use and fit for purpose.
- Where appropriate, having policies and procedures in place that identify, manage, and control risks associated with operations.
- Not engaging in any acts of corruption or bribery or applying undue influence to affect the business decisions of others.
- Taking all reasonable steps to avoid causing harm to others as a result of business decisions.
- If a construction Supplier, meet the standards of the Code of Practice for the South Australian Construction Industry.
- Operate in a way that safeguards against unfair business practices.

## Whistleblower Standards

AAL fosters a culture of reporting misconduct and manage reports of such in accordance with relevant laws. In support of the human rights policy, AAL Whistleblower policy allows instances of misconduct or potential misconduct including potential breaches of human rights and modern slavery concerns to be escalated and handled in a confidential and sensitive manner.

Suppliers, their employees, and subcontractors are entitled to report misconduct, relating to AAL, in accordance with the AAL Whistleblower Policy and where such report is made, will be afforded the relevant protections set out in the Policy. AAL Whistleblower policy is available from AAL on request.

A Disclosing Person can report Reportable Misconduct in the following ways to the independent External Hotline:

- by phone on 1300 30 45 50 (free within Australia);
- by using the online reporting tool <https://aal.stoplinereport.com>;
- by email to [aal@stopline.com.au](mailto:aal@stopline.com.au); or
- by mail to AAL Reporting Misconduct, c/o Stopline, Locked Bag 8, Hawthorn, VIC 3122.

Once a Disclosing Person has made a report through the External Hotline (either by phone, email, fax or mail), the report will be confidentiality transferred by a representative of the External Hotline to the Protection Officer.

## Compliance with Laws

In addition to the specific requirements of this Code, and the terms of supplier's relevant contract with AAL, suppliers are expected to (and must) comply with all applicable laws and industry or other standards. AAL suppliers are expected to make all reasonable efforts to ensure the same levels of compliance from their suppliers, including subcontractors and temporary labour hire agencies.

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## Labour and Human Rights Compliance

Respect for human rights underpins the way we do business. AAL requires its suppliers to comply with the intent and purpose of the *Modern Slavery Act 2018* (Cth). This means:

- Suppliers must not use and make all reasonable efforts to ensure businesses within their own supply chains do not use forced, coerced, involuntary, or child labour.
- Employees should be free to choose their own employment and be free to leave that employment without coercion.
- Suppliers must be prepared to provide AAL with the names and geographic locations of their own suppliers, if requested, for the purpose of modern slavery risk assessments.
- Suppliers who are reporting entities under the Modern Slavery Act 2018 must provide AAL with a copy of their annual report, if requested.
- Suppliers must respond to AAL's Modern Slavery Annual Compliance Statement if requested to do so.

AAL expects its suppliers to treat employees fairly and with respect. This includes:

- Complying with the Fair Work Act 2009, National Employment Standards (NES) and other legislation, awards or agreements relevant to the working conditions of employees, including the payment of wages, working hours, leave and employment benefits and superannuation entitlements.
- Engage ethically, transparently and with a high level of respect with their employees and subcontractors.
- Respecting freedom of association and the right to collective bargaining and allowing employees to join (without coercion) or be represented by a trade union or industrial organisation of their choosing.
- Policies and procedures/workplace practices aiming workplaces are free from harassment, bullying and discrimination.

AAL expects its suppliers to provide a safe and healthy working environment. This includes:

- Complying with all relevant laws and regulations relating to workplace health and safety.
- Having policies and procedures in place to document and minimise health and safety related risks and incidents.
- Ensuring all equipment is safe for use and staff are fully trained in its use.
- Proactively engaging with employees on safety issues and ensuring any policies and procedures are clearly communicated to all staff.

## Supplier Diversity

AAL supports supplier diversity and is developing initiatives to support Aboriginal and Torres Strait Islander owned businesses and Social Enterprises in our supply chain. AAL encourage its suppliers to consider their approach to supporting supplier diversity in their own supply chains.

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## Cyber Security Compliance

At AAL, we hold a strong commitment to protecting the security of our operations and extend this to our valued suppliers. In today's interconnected digital landscape, cyber threats are a real concern. We understand that securing our supply chain is essential for our overall cybersecurity.

As a supplier, it's important that you follow good cybersecurity practices, such as safeguarding sensitive information and using secure communication channels. Equally important is promptly reporting any cybersecurity incidents. If you encounter such an incident, please notify our cybersecurity response team promptly at [cyber@aal.com.au](mailto:cyber@aal.com.au). Your timely reporting helps us work together effectively to manage and investigate any issues and put in place the necessary protections. This collaborative effort strengthens our defences against cyber threats and maintains the trust that forms the foundation of our partnership.

## Environmental Compliance and Sustainability

AAL is proactive in being an environmentally sustainable organisation and aim to procure goods and services in an environmentally responsible manner. AAL expects its suppliers to look for opportunities to improve environmental outcomes. This includes:

- Complying with all relevant laws and regulations relating to the protection of the environment.
- Taking all reasonable steps to protect the environment, including avoiding environmental damage and/or negative environmental impact through the manufacture and supply of goods or services.
- Taking reasonable steps to minimise the volume of waste produced, ensuring that waste is disposed of in a responsible manner, and where appropriate recycle waste.
- Having an environmental management plan or system, policies, and/or procedures in place, and be acting on them, to minimise environmental impact and adopt or work towards internationally recognised environmental standards (where appropriate).
- Promoting positive environmental impacts (such as reduced carbon emissions, use of renewable energy, better carbon management, waste management, water management, reduced pollution levels and technological improvements) where appropriate.
- Being prepared to demonstrate or report to AAL their environmental and sustainability practices, if requested.
- Being prepared to provide AAL with data relating to carbon emissions data (scope 1, 2 and 3 carbon emissions as per the Greenhouse Gas protocol), if available.

## 4. Notification if unable to comply

AAL Suppliers are required to continuously assess their compliance with this Code and notify AAL if they become aware of any breach or become aware or reasonably suspects that they are unable to comply with the standards in this Policy.

## 5. Related Policies and Procedures

- AAL Whistleblower Policy
- Modern Slavery Guidelines
- Sustainable Procurement Guidelines

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