

Appendix

1-02 Procurement Policies

POL-PRO-002 Contractor Code of Conduct

Health and Safety

Contractors shall provide a safe and healthy workplace for all Workers, which includes but not limited to any employees, officers, agents, contractors and subcontractors of the Contractor ("**Workers**") involved in their business, taking all practical and reasonable measures to eliminate workplace fatalities, injuries and disease.

Contractors shall have an adequate, risk-based health and safety approach, including but not limited to providing relevant instructions and training that is understandable to all Workers.

Regardless of the method of employment, all Workers engaged by Contractors must have the right to refuse a work situation if they reasonably believe that it presents an imminent and serious risk to their health and safety.

Legal Compliance

Contractors shall comply with all applicable laws, regulations, policies, standards and codes of conduct.

Where the requirements in the Contractor Code of Conduct are stricter than any applicable laws, regulations, policies, standards, the requirements of the Contractor Code of Conduct shall be applied. Should there be actual or potential contradictions between the Contractor Code of Conduct and applicable laws and regulations, policies, standards, Contractors are to notify LGP within seven (7) business days.

Human and Labour Rights

Modern Slavery

Contractors shall not engage in any form of slavery, forced labour, debt bondage, child labour and human trafficking. Contractors shall use all reasonable endeavours to ensure that its supply chain, including any international elements, is free from modern slavery.

When a Contractor becomes aware of the presence of modern slavery in their operations or supply chain, they must report this to LGP and the relevant Customer as soon as possible. Reporting should outline details of the human rights violation uncovered and what remedial and preventive measures are occurring.

Discrimination, Harassment and Abuse

Contractors shall commit to a workplace free from workplace discrimination, harassment, bullying, victimisation and abuse. Contractors shall not tolerate any form of discrimination, harassment, bullying, victimisation or abuse, against any of their employees or anyone who works with them.

Working hours and compensation

Contractors shall uphold fair remuneration and working conditions for all Workers, who shall be paid at least the local industry rate or minimum wage stipulated by national law, whichever is higher, and benefit from social security schemes according to national legal standards. Should there be no legal minimum wage in the country of operation, fair and decent conditions imply Contractors shall pay their Workers considering the general level of wages or remuneration in the country, the cost of living, social security benefits and the relative living standards.

Freedom of Association and Collective Bargaining

Contractors shall respect the right of employees to freely associate, join, form, or not to join a labour union or otherwise engage in collective bargaining in accordance with the laws of the countries in which they are employed. Employee representatives shall not be subject to discrimination or termination of contract in retaliation for exercising employee rights, submitting grievances, participating in union activities, or reporting suspected legal violations.

Where any law fails to protect freedom of association, Contractors shall comply with the law while providing Workers with the opportunity to safely and openly communicate with each other and with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment.

Environment

Contractors shall comply with all applicable laws and regulations relating to the environment, including any management and reporting obligations. Contractors are expected to proactively minimise the environmental impact of their operations and actively pursue Circular Economy solutions. This includes, but is not limited to:

- Maintaining environmentally responsible policies and practices.
- Waste reduction – Contractors shall implement practices to reduce waste at every stage of production and operations, ensuring the efficient use of resources and minimising the creation of excess materials.
- Reuse and recycling – Contractors are encouraged to prioritise the reuse and recycling of materials wherever possible. This includes establishing systems for sorting, collecting, and recycling waste materials to reduce landfill dependency.
- Sustainable materials – Contractors shall strive to use environmentally sustainable materials, ensuring that products and packaging can be reused, recycled, or safely disposed of in a manner that minimises harm to the environment.

Any adverse environmental impacts resulting from operations must be reported to LGP and the relevant Customer as soon as possible following an incident. Reporting should outline specific details of the incident and resulting impacts, along with any remedial activities undertaken and preventative measures put in place to reduce the risk of further related incidents.

Social Value

Contractors are expected to look for and embrace opportunities to engage local Workers, service providers and/or businesses, where practicable. This includes opportunities for indigenous businesses, marginalised groups, people experiencing difficulty entering the workforce and social enterprises within the local community.

Ethics

Conflict of interest

Contractors shall declare to LGP any situation that raises an actual, potential or perceived conflict of interest related to or in connection with its dealings with LGP and/or Customers.

Gifts and Benefits

Contractors shall not offer LGP or any Customer personnel gifts or benefits, either directly or indirectly, and offers of hospitality and promotional items are to be limited to token offers of basic courtesy.

Bribery and Corruption

Contractors shall comply with all applicable anti-corruption laws and regulations and have a zero-tolerance policy towards any form of bribery, corruption, extortion and embezzlement. Contractors shall not hire third parties to do something they are not allowed to do themselves, like paying bribes.

Competition Laws

Contractors shall comply with all applicable competition and antitrust laws and must not engage in collusive and/or anti-competitive conduct.

Personal Data Protection

Contractors shall comply with all applicable data protection and privacy laws and use personal data only when lawful and necessary to fulfill legitimate business purposes.

Sanctions and Embargo Lists

Contractors must comply with any applicable laws, regulations, policies, standards and codes of conduct, and international sanctions regulations. Contractors shall not engage in or cause LGP or any Customers to engage in any form of sanction breaches.