



# **BHAGWAN MARINE LIMITED**

ABN 81 009 154 349

## **Supplier Code of Conduct**

# Supplier Code of Conduct

## 1. Objective

This Supplier Code of Conduct (Code) sets out the minimum ethical expectations of suppliers and contractors who work with Bhagwan Marine Limited and its subsidiaries (Bhagwan Marine).

## 2. Scope and Availability

Bhagwan Marine conducts its business in an open, honest and ethical manner as outlined in the Company's key policies and standards including the Code of Conduct, Modern Slavery Policy, Just Culture Policy, and Whistleblower Policy. These policies are available on Bhagwan Marine's website: <https://bhagwanmarine.com/investors/corporate-governance/>

Suppliers and contractors who work with Bhagwan Marine are expected to meet, or exceed, the requirements set out in this Code.

Bhagwan Marine reserves the right to audit compliance with this Code and discontinue doing business with suppliers and contractors who do not meet the minimum expectations set out in this document.

This Code applies to all suppliers and contractors as well as their sub-suppliers and sub-contractors.

## 3. Minimum Expectations

We expect our suppliers and contractors to:

- Comply with this Code and other applicable Bhagwan Marine's policies.
- Follow transparent business processes and high standards of business conduct.
- Observe fair competition by not discussing commercial agreements, market share, pricing or similar activities with our competitors.
- Make decisions throughout the supply chain without conflict of interest and with safeguards against fraudulent behaviour such as giving or receiving bribes.

### 3.1 *Legal Obligations*

- Comply with all applicable Australian national and local laws and regulations as well as laws and regulations in your own country, where relevant.
- Disclose to Bhagwan Marine anything that could impact your ability to provide contracted goods or services.

### 3.2 *Health and Safety*

- Comply with all relevant health and safety laws and regulations.
- Implement a safety and health management system.
- Take proactive action to prevent work-related injury or illness.

### 3.3 *Anti-bribery and Corruption*

- Identify and mitigate bribery and corruption risks relevant to your business and implement adequate policies for preventing bribery and corruption.
- Maintain practices to manage actual or potential conflicts of interest which could influence, or appear to influence, the impartiality of providing goods and services to Bhagwan Marine or impact business in any manner.

### 3.4 *Human Rights and Modern Slavery Prevention*

- Implement adequate policies relating to maintaining human rights and prevention of modern slavery in your supply chain and operations.
- Maintain a record of modern slavery risks relevant to your operations and your suppliers/contractors' supply chain. Take action to mitigate these risks.
- Conduct appropriate due diligence on suppliers in your supply chain, particularly when sourcing from high-risk areas.
- To notify Bhagwan Marine of any identified modern slavery risks or occurrences that affect goods and services supplied to Bhagwan Marine.

### 3.5 *Labour and Workforce Management*

- Comply with all relevant laws and regulations regarding employment conditions, practices and legally mandated benefits.
- Promote diversity and inclusion within your workforce.

### 3.6 *Environmental Sustainability*

- Comply with all relevant environmental laws, including environmental permits and reporting requirements.
- Implement policies to manage any environment obligations and risks.
- Maintain an adequate system to identify and mitigate environmental risks.
- Support a precautionary approach to environmental challenges and initiatives and promote environmental responsibility.

### 3.7 *Quality Management and Supplier Selection*

- Implement appropriate industry quality standards relating to quality of goods and services, quality control processes, supplier selection, supplier feedback and continuous learning.
- Maintain quality control processes throughout your business that are understood by your personnel and suppliers in your supply chain.

- Apply similar minimum standards to these in this Code to your personnel and in your dealings with suppliers and contractors.

### 3.8 *Data Protection and Cyber Security*

- Comply with all relevant laws and regulations, including Australian Privacy Principles and cyber security, relating to the privacy and security of personal data.
- Take all reasonable steps to protect your IT applications and infrastructure, as well as confidential information and any data obtained from Bhagwan Marine.
- Respect intellectual property rights, including formally negotiating access, licence or intellectual property.
- Implement adequate policies relating to privacy laws, cyber security, and intellectual property regulations.
- Immediately notify Bhagwan Marine when you become aware of a cyber security incident or breach of confidentiality.

### 3.9 *Trade Control*

- Maintain adequate systems and practices to prevent the use of illegally or unethically sourced materials.
- Take action to prevent counterfeit, fraudulent or suspicious items from entering the supply chain.

### 3.10 *Media and Communications*

- Any broad communication such as press releases, media interviews or marketing materials regarding or referencing your business and its dealings with Bhagwan Marine must be formally approved by Bhagwan Marine before publication.

### 3.11 *Management Systems and Reporting*

- Implement adequate management systems and reporting mechanisms.
- Demonstrate commitment to an effective and transparent culture of compliance.
- At the request of Bhagwan Marine, report your organisation's (and its extended supply chain) performance on health and safety, environment, carbon emissions, data breaches, and modern slavery.

## 4. **Speak-up**

If you would like to let us know about any actual or suspected wrongdoing, please contact Bhagwan Marine via phone on +61 8 9424 2300 or via email: [speakup@bhagwanmarine.com](mailto:speakup@bhagwanmarine.com).

**Effective: 1 March 2025**

