

Cpl Group

Supplier Code of Conduct

Opening Statement

At Cpl, it is our vision to transform each client's business through a range of talent solutions while positively impacting the communities we work in and the lives of the people we work with. Responsible supply chain management is essential to achieve this.

Our core values of Customer Focus, Accountability, Respect, Effective Communication and Empowerment guide our interactions with our suppliers, clients, candidates, and each other. They are an integral part of our culture and sustainability vision. Our guiding principles are aligned with ethical, social, and environmental responsibilities to help ensure sustainability of our business and the communities in which we operate.

Wherever we do business, Cpl complies with existing laws and regulations and want to ensure that our suppliers operate in the same manner. We must therefore establish a foundation of shared values, accountability, ethics, and a culture of trust and openness throughout our value chain.

Cpl are committed to the responsible sourcing of goods and services and this Supplier Code of Conduct sets out our expectations of those who provide these goods and services to Cpl and our subsidiaries. We encourage you to support our Supplier Code of Conduct or adopt your own codes which include objectives similar to ours.

This code is informed by a number of international standards and guidance documents including:

- International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work,
- United Nations (UN) Guiding Principles on Business and Human Rights,
- UN's Convention on the Elimination of all forms of Discrimination Against Women,
- UN's Sustainable Development Goals,
- UNICEF's Children's Rights and Business Principles,
- International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families,
- Convention on the Rights of the Child, and;
- Other relevant international human rights and labour standards.

Purpose & Scope

This Code of Conduct sets out the **minimum** standards we expect from our suppliers. The term ‘supplier’ as used in this code refers to suppliers, vendors, contractors, consultants, agents and other providers of goods and services who do, or seek to do, business with Cpl.

Business Standards

As a responsible business, Cpl sets the highest standards for the way we conduct our operations. In turn, we expect suppliers to conduct business responsibly, with integrity and transparency. Furthermore, we expect suppliers to treat all employees fairly, honestly and with respect. We seek to build business relationships with suppliers who share a common commitment to:

- Operate in full compliance with all applicable laws, rules and regulations.
- Conduct their business in an ethical manner, acting with integrity.
- Commit to upholding the human rights of workers and to treat them with dignity and respect.
- Provide a safe and healthy work environment
- Operate in an environmentally responsible and efficient manner to minimize adverse impacts on the environment.
- Facilitate continuous improvement and compliance

The Environment

Environment

- Cpl is committed to conducting business in a manner that demonstrates respect for the environment. Cpl is acting to reduce the adverse environmental impacts of its activities, products and services and we expect the same of our suppliers.
- Suppliers should make continuous improvements in their operations by keeping up with good operating practices, to ensure the responsible use of natural resources, cleaner production, pollution prevention and the creation of products with lower environmental impacts.
- Cpl recognises the right to water and suppliers must implement practices to ensure good water stewardship, including optimising the use of water onsite, employing adequate wastewater or effluent controls to protect the surrounding environment and ensuring withdrawals do not adversely impact on the needs of local communities and other water users.
- Suppliers are required to be transparent about their raw material sourcing practices and will share upon request relevant traceability information that supports Cpl’s broader responsible sourcing goals.
- Suppliers should consider the environmental credentials and performance of vendors within their own supply chain and require them to operate to a minimum set of standards

Waste

- Suppliers shall make practical efforts to eliminate or reduce levels of generated waste and should reuse and recycle waste materials wherever possible. The handling, storage, movement, treatment and disposal of all waste must be carried out in accordance with applicable regulations and in an environmentally responsible manner

Energy and Facilities

- Suppliers should make practical efforts to minimize the use of energy, water and raw materials. Where possible, these should be renewable or sustainably sourced.
- Emissions to air that are likely to cause pollution or contribute to climate change should be monitored, controlled and minimized where possible.

People and Community

Diversity and Inclusion

- Cpl does not tolerate any form of discrimination or bullying and harassment in the workplace. We expect our suppliers to have a clear policy in relation to Diversity and Inclusion.
- Our suppliers shall not engage in or support discrimination based on race, colour, sex, language, religion, political or other opinion, caste, national or social origin, property, birth, union affiliation, sexual orientation, health status, family responsibilities, age, disability or other distinguishing characteristics, in accordance with the ILO conventions 100 and 111.
- Suppliers will be required to meet the requirements of any applicable discrimination legislation. Our suppliers will be treated fairly and equally during the tendering and purchasing process, with decisions made on the basis of clear selection criteria
- Cpl expects suppliers to have a policy in place to consider usability by, and inclusion of, individuals with disabilities when designing products and/or delivering services to Cpl.
- We expect suppliers to have a policy that explicitly bans discrimination/bullying and harassment based on sexual orientation, race, gender or gender identity/expression. In addition, suppliers are also encouraged to have evidence of diversity and inclusiveness training that is inclusive of sexual orientation and gender identity/expression.
- Cpl expects suppliers to have equivalent policies to promote diversity in their supply chains and purchase from diverse businesses.

Discrimination / Fair Treatment

- Suppliers shall not discriminate in hiring, compensation, access to training, promotion, termination or retirement on the grounds of race, caste, religion, age, nationality, social or ethnic origin, sexual orientation, gender, gender identity or expression, marital status, family status, pregnancy, union membership, political affiliation, disability or other legally protected class.
- Suppliers shall respect the rights of women and seek to create an environment in which they can access opportunities to participate in the workplace on an equal basis.
- The use of physical abuse, verbal or sexual harassment or intimidation of workers shall be prohibited by suppliers.

Child Labour

- Cpl strictly opposes child labour and other forms of exploitation of children and minority groups. Our suppliers shall not engage in or benefit from the use of child labour, in accordance with the ILO convention 138.

- Where young people under the age of 18 are employed, suppliers will ensure that their work is not likely to be harmful to their health and/or development, including no working under hazardous conditions and ensuring compliance with all applicable laws.

Forced Labour

- Cpl suppliers must not participate in, or benefit from, any form of forced labour, including bonded labour, forced prison labour, slavery, servitude or human trafficking, in accordance with the ILO-conventions 29 and 105.
- Cpl expects our suppliers to have a clear policy in relation to Modern Slavery laws in the jurisdiction in which they operate.
- Suppliers must ensure no fees or related costs are charged to applicants and workers for recruitment and that no monetary deposits, financial or collateral guarantees or personal possessions are demanded as a condition of employment.
- Suppliers must ensure that workers are not held in debt bondage or forced to work for an employer, or any other entity to pay off debt.
- Suppliers shall not restrict worker's freedom of movement, require workers to remain at the workplace at the conclusion of their working hours or confine them in any worker accommodation.

Right to Work

- Suppliers must ensure that all employees have the legal right to work, and any migrant workers should be in possession of a valid work permit issued by the relevant authority.
- Suppliers shall implement effective measures to protect migrant employees against any form of discrimination.

Freedom of Association and Collective Bargaining

- Cpl suppliers must not interfere with the workers' rights to form and join unions or other associations and to negotiate collectively. Suppliers will allow workplace access for such organisations to facilitate their representative functions.
- In the absence of legal protections for the right to collective bargaining or freedom of association, suppliers will seek to engage workers through alternative lawful mechanisms that allow worker representation on workplace issues.
- Suppliers must develop and implement mechanisms for resolving industrial disputes, including employee grievances, and ensure effective communication with employees and their representatives.

Occupational Health & Safety

- Cpl suppliers must follow adequate health and safety policies and ensure that its workers are offered a safe and healthy working environment including providing adequate training and effective protective equipment to safely carry out their duties. Suppliers will also provide access to clean toilet facilities, potable water and sanitary facilities for food storage.
- Cpl suppliers must, as a minimum, comply with local legal standards regarding wages and benefits. If the industry benchmark standards are higher, then Cpl will request that these standards are met.

- Facilities must be constructed and maintained in accordance with applicable laws and regulations. Accommodation, where provided, shall be clean, safe and meet the basic needs of workers while respecting their dignity. Suppliers will also ensure that there are appropriate exits, procedures and equipment in place to deal with emergency situations.

Ethics & Leadership

Compliance with the Law

- In addition to meeting the terms of this Code of Conduct, Cpl suppliers shall comply with all local and national laws and regulations, as with other applicable standards.

Wages

- Suppliers are required to inform workers about their employment terms and conditions in writing and in an understandable manner before they enter into employment.
- Suppliers shall ensure that their employees are fairly compensated. At a minimum, compensation must comply with all applicable wage and hour laws, or industry standards approved on the basis of collective bargaining, whichever is higher. Suppliers should aim to provide compensation for a regular work week that is sufficient to meet workers' basic living needs and provide some discretionary income.
- Deductions to wages shall only be made in accordance with applicable law or under collective agreement and all workers will be provided with clear and written details of their wages each time they are paid.

Working Hours

- Suppliers must provide for working hours that comply with national laws and industry standards. Regular hours worked shall not typically exceed sixty hours per week, (including overtime) and workers will be provided with one day off in every seven-day period.
- Overtime shall be voluntary and compensated at a premium rate. All overtime related practices will be conducted in accordance with applicable laws and regulatory standards.
- Suppliers shall not seek to avoid obligations to workers under labour or social security laws and regulations arising from the regular employment relationship through the excessive use of fixed-term contracts, labour-only contracting, subcontracting, home-working or apprenticeship schemes.

Land Rights

- Suppliers shall respect the rights to land tenure of local communities and indigenous peoples impacted by its operations, including its raw material sourcing, and will adhere to the principle of Free, Prior and Informed Consent.

Business Ethics

- In keeping with our commitment to exercising appropriate standards of professionalism and ethical conduct in all business activities, Cpl will not tolerate bribery or corruption in any form, or any acts that contravene its Anti-Bribery Policy.

- Suppliers and business partners are not permitted to directly or indirectly promise, offer or provide any improper advantage to any person or entity, including officials of a government or a government-controlled entity. Cpl's employees are not allowed to accept any such advantage and we expect the same approach in business dealings from our business partners, suppliers and third parties.
- Suppliers must disclose any personal relationships, economic interest or other ties to their business held by an employee or contractor with Cpl.
- Suppliers shall take appropriate measures to secure and protect all confidential information related to its relationship with Cpl and use it only for the purpose authorised under contractual agreement. This obligation shall remain in force regardless of the status of the business relationship.

Monitoring

Cpl expects that our suppliers to proactively monitor and audit their day-to-day management processes, taking into consideration Cpl's Code of Conduct. Cpl may conduct annual compliance surveys to confirm compliance with this Supplier Code of Conduct.

Suppliers shall cooperate with Cpl to allow the Group, or any authorised third party, to conduct audits to verify compliance with these standards or other required certifications. In the event deficiencies are identified, the supplier will take the steps necessary within an acceptable timeframe to correct any deficiency to Cpl's satisfaction. Suppliers shall immediately report any concerns about compliance with legal requirements or any aspect of this code, to their designated point of contact.

Where suppliers are found to have contravened the requirements set out in this Code, Cpl reserves the right to terminate any associated agreement or business relationship.

Available Supports

At Cpl, we recognise the varying steps that our suppliers may be on in the journey to becoming a more sustainable business and have provided a range of supporting documents below, should they be of need.

- [International Labour Organisation's \(ILO\) Declaration on Fundamental Principles and Rights at Work](#)
- [United Nations \(UN\) Guiding Principles on Business and Human Rights,](#)
- [UN's Convention on the Elimination of all forms of Discrimination Against Women,](#)
- [UN's Sustainable Development Goals,](#)
- [UNICEFs Children's Rights and Business Principles,](#)
- [International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families,](#)
- [Convention on the Rights of the Child](#)

