



NORTHLINE

Australia's Global Logistics People

Supplier Code of Conduct

Supplier Code of Conduct

Contents

1	Introduction	3
2	Labour Standards.....	3
2.1	Labour Rights	3
2.2	Forced, Involuntary or Bonded Labour	3
2.3	Working Hours, Wages & Benefits	4
2.4	Child Labour.....	4
2.5	Migrant Employees.....	4
2.6	Freedom of Association	4
2.7	Anti-Discrimination	4
2.8	Respect in the Workplace.....	5
2.9	Privacy	5
3	Business Governance	5
3.1	Conflicts of Interest	5
3.2	Bribery & Corruption.....	6
3.3	Gifts, Benefits & Hospitality	6
3.4	Freedom of Association, Grievance Mechanisms & Recourse	6
3.5	Whistleblower Protection	6
4	Occupational Health & Safety	7
5	Environment	7
6	Commitment.....	7



1 Introduction

In line with our purpose and values and the way we do business, this Supplier Code of Conduct Statement sets out the minimum standards of actions and behaviours expected by Northline business units and all persons engaged by Northline including employees, contractors, suppliers and agents.

Organisations at all levels of our supply chain should aim to maintain existing co-operations and to create new partnerships with the same values and standards as summarised in our Supplier Code of Conduct.



Suppliers who seek to engage with Northline will be expected to commit to compliance with the values, high standards and requirements of this Code, along with all applicable local, national and international laws, or adhere to equivalent standards.

Northline will monitor the compliance of current Suppliers with this Code and will evaluate potential new Suppliers to assess their understanding of and commitment to comply with this Code.

If a Supplier is not compliant with the requirements of this Code, Northline will work with the Supplier to give opportunity to remedy the non-compliance. A Supplier's engagement with Northline may be ceased where the Supplier records a serious breach or continued non-compliance.

Suppliers must communicate this Code to all those who work for them in providing goods and services to Northline, and their own suppliers and subcontractors who are engaged by them to do so.

2 Labour Standards

Northline is committed to maintaining a culture of ethical sourcing and respect for human rights. We are committed to ensuring a supportive and inclusive workplace that is free from harassment and discrimination.

Northline supports fundamental human rights and the prevention of modern slavery and human trafficking. We will work with our Suppliers to address issues relating to acts of modern slavery.

The responsibility of our Suppliers includes the following:

2.1 Labour Rights

Suppliers must:

- Comply with all relevant laws and regulations relating to labour and human rights.
- Have in place procedures and activities to identify, investigate, prevent and remedy any occurrence of modern slavery, including human trafficking, slavery, forced labour or child labour.

2.2 Forced, Involuntary or Bonded Labour

Suppliers must:

- Ensure all work is engaged on a voluntary basis.
- Ensure employees are not subject to any form of forced labour, bonded labour, or indentured labour.
- Ensure employees do not have a portion of their pay withheld at any time as a condition of obtaining or retaining employment nor required to participate in savings programs.
- Allow employees freedom to leave their employ after reasonable notice.
- Respect the freedom of movement of employees. Employees are not to be restricted in their movement by control of identity papers, by holding money deposits or by taking any other action to prevent employees from terminating their employment.

2.3 Working Hours, Wages & Benefits

Suppliers must:

- Ensure decent, fair and equitable pay to all workers, free of discrimination.
- At a minimum comply with all laws regulating local wages, overtime compensation and legally mandated benefits.
- Ensure each employee is provided with a clear, understandable labour contract containing all legally required employment terms, entitlements and conditions.
- Comply with applicable laws for all working and rest hours.
- Ensure overtime is restricted to reasonable additional hours in accordance with workplace laws.
- Ensure no employee will be made to work overtime under the threat of penalty, dismissal, or denunciation to authorities, or as a disciplinary measure, or for failure to meet business targets.
- Ensure no deceptive or coercive practices during recruitment or employment are used.



2.4 Child Labour

Northline does not tolerate child labour and respects children's right to personal development and education. Child labour is not permitted in Northline's supply chain.

Suppliers must:

- Ensure their minimum working age of employment is the age of completion of compulsory school, but never less than 15 years.
- Verify the age of their workers and maintain copies of their workers' proof of age.

2.5 Migrant Employees

Suppliers must:

- Only engage workers with a legal right to work.
- Ensure migrant employees are not required to surrender identification or immigration documents or are denied access to any identity or immigration documents.
- Provide conditions of work to migrant employees no less favourable than those available to country nationals.

2.6 Freedom of Association

Suppliers must:

- Respect the rights of employees to lawfully associate or not to associate with groups of their choosing, as long as such groups are legal in the country of employ.
- Allow employees the right to join or form trade unions of their choosing.

2.7 Anti-Discrimination

Northline cares deeply about creating a positive and respectful workforce and creating equal opportunities for everyone. Suppliers must:

- Treat all employees fairly and equally, irrespective of their nationality or legal status.
- Base all conditions of employment on an individual's ability to do the job, not on the basis of personal characteristics, such as gender, ethnic origin, religion, age, disability, personal beliefs, marital status, sexual orientation, union membership or political affiliation.

- Ensure employees work without distress or interference caused by harassment, discrimination or any other inappropriate workplace behaviour.

2.8 Respect in the Workplace

Northline values diversity in the workplace. It recognises the many benefits that a diverse workplace can bring to the organisation.

We are committed to ensuring that our workforce is one where all employees, potential employees, customers, contractors, sub-contractors, temporary labour, suppliers and other external parties are treated with dignity, courtesy and respect and which is free from discrimination, sexual harassment, bullying and victimisation. Any form of violence including both physical and verbal is strictly forbidden. Suppliers must:



- Ensure all employees are treated with dignity and respect and their workplaces are free of any form of harassment or inhumane treatment including any behaviour that creates an offensive, hostile or intimidating environment.
- Prohibit the use or threat of physical or sexual violence, harassment, and intimidation against an employee, their family, or friends and associates.
- Clearly define and communicate disciplinary policies and procedures to all employees, and do not include any inhumane disciplinary measures, including corporal punishment, mental or physical coercion, or verbal abuse of employees.

2.9 Privacy

Privacy applies to Northline people and Suppliers people and includes any personal information accumulated while providing services to Northline. We expect Suppliers to:

- Respect the basic right of individuals to privacy, including by adhering to all applicable privacy law requirements regarding the collection, storage, processing, transmission and use of personal information.
- Value the privacy of people who work with you
- Use personal information for proper purposes only, protect it, keep it only as long as you need it, and allow people to see, and correct any information you have about them.

3 Business Governance

Northline insists on honesty, integrity and fairness when conducting business and complies with all applicable laws and regulations in Australia. We also have a commitment to risk management and corrective action systems which are key to a reliable supply chain.

Suppliers must comply with all applicable local, national and international laws, regulations or permits in the regions they operate, and to maintain sound administration and governance processes.

Suppliers should develop and maintain a process to identify, manage and control relevant risks associated with its operations. These include supply chain risks and risks relating to business ethics and corporate governance.

The supplier agrees to ethical conduct when dealing with customers, suppliers, competitors and authorities.

3.1 Conflicts of Interest

A conflict of interest may arise when an employee, a contractor, a supplier or someone who works with our parties is involved in some way that could affect the way in which decisions are made on Northline's behalf. Suppliers are required to avoid actual, potential or perceived conflicts of interest with Northline and its employees, or any other parties.

Decisions our Suppliers take regarding Northline business transactions cannot be influenced by personal or private interests.

Northline must be notified where a supplier is aware of a conflict of interest.

3.2 Bribery & Corruption

Northline has a zero tolerance to any form of bribery or corruption, fully committed to fighting all forms of bribery and corruption and to complying with relevant local and international anti-bribery and anti-corruption laws in which Northline has business dealings. Northline expects suppliers to:

- Comply with all applicable anti-bribery laws in the jurisdictions in which they are established or operate.
- Not offer, make, solicit or accept improper payments or other things of value, directly or indirectly, to secure improper advantage in business dealings with Northline or other parties
- Not solicit, accept, or agree to accept any money, advantage or other things of value from a Northline director, employee, officer or any third party in exchange for an improper advantage with Northline or other parties
- Not knowingly allow their contractual relations with Northline to be used as a vehicle for improper payments.

3.3 Gifts, Benefits & Hospitality

We expect Northline employees to be honest and transparent in their dealings both internally and externally and to always act in the best interest of Northline, our customers, and suppliers.

Gifts and benefits may be offered as a subtle form of influence to create a favourable impression or to gain preferential treatment. This may give rise to a conflict of interest and create a sense of obligation that may compromise impartial and honest decision making from a business perspective.

A Northline employee or contractor must not accept a gift or benefit that could reasonably be perceived as having been provided with the intent of influencing the outcome of business transactions.

Suppliers must respect and comply with Northline's requirements.

3.4 Freedom of Association, Grievance Mechanisms & Recourse

Northline ensures that no interference, obstruction or prevention of legitimate related activities, such as collective bargaining, takes place. Employees are allowed to select employee representatives.

Representatives are not discriminated against and have regular access to company management or appropriate process in order to address grievances and other issues.

Suppliers must comply with Northline's requirements.

3.5 Whistleblower Protection

Northline is committed to promoting and supporting a culture of corporate compliance and proper ethical behaviour. Northline encourages whistleblowers to assist in maintaining legal, proper and ethical operations of Northline by reporting non-compliant actions by others.

Similarly, suppliers, their employees and contractors can approach Northline management on issues of concern on their own or through their employee representatives, confidentially.

An Eligible Whistleblower can report Reportable Conduct to the following independent Whistleblower Protection Officer nominated by Northline:

Jon Clarke

Jon Clarke Advisory
Level 3, 149 Flinders Street
Adelaide SA 5000
Phone: (08) 8223 1727
Website: www.jonclarkeadvisory.com.au
Email: jon@jonclarkeadvisory.com.au

4 Occupational Health & Safety

Northline is committed to the health and safety of our workers, customers, contractors, visitors and suppliers. We believe maintaining good health and well-being of employees is integral to the success of any business. We expect our suppliers to comply with Health and Safety laws, Regulations, Standards and appropriate Codes of Practice in the country where workers are engaged. Suppliers must maintain good health and well-being of their employees and manage their operations to meet the following standards:



- All necessary supervision, training, instruction, equipment, resourcing and information is provided.
- A safe and hygienic workplace environment is provided where workers have the right to refuse work that is unsafe.
- Job related training and consultation with employees is provided.
- Potential exposure of workers to safety hazards are identified and controlled. Risks are assessed and eliminated or otherwise controlled using the hierarchy of control.
- Workers are provided with personal protective equipment including access to first aid supplies and trained in their use.
- Workers have access to clean toilet facilities, clean drinking water and, where appropriate, sanitary facilities for food storage and preparation.

5 Environment

Northline recognises its environmental obligations and is committed to implementing, maintaining and continuously improving its business operations to achieve best practice in environmental performance. We expect Suppliers to:

- Meet their obligation to minimise impact on the environment from their operations, products and services through the efficient use of natural resources, energy, water and minimising emissions of greenhouse gases and waste.
- Comply with all applicable laws and regulations relating to the environment, including any management and reporting obligations.
- Manage their environmental obligations and use science based continuous improvement programs to reduce their carbon footprint and conduct their business in an environmentally responsible manner.
- Maintain policies and practices that reduce the risk of pollution, loss of biodiversity, deforestation, damage to ecosystems and greenhouse gas emissions.



6 Commitment

Suppliers must be committed to comply with this statement and ensure all those who work for them in providing goods and services to Northline also comply. Similarly, ensure their own suppliers and subcontractors who are used to supply Northline are also committed to comply.