



**O'BRIEN®  
SUPPLIER CODE OF CONDUCT**



# O'BRIEN® SUPPLIER CODE OF CONDUCT

The O'Brien Group (O'Brien) embraces conducting business in a safe, sustainable, responsible, lawful fair and ethical manner. Our purpose is to make a difference by demonstrating real care for our customers, our people and the communities we operate in. To achieve this, we recognise we have a responsibility to work in a collaborative manner with our suppliers to manage environmental and social risks.

The purpose of this Supplier Code of Conduct (Code) is to clearly set out the minimum requirements and expectations we have of our suppliers (and suppliers in their own supply chain) in their delivery of goods and services to O'Brien. By suppliers, we mean any organisation or contractor providing goods or services to O'Brien, including their own subcontractors. Compliance with the minimum requirements outlined in this Code is a requirement of conducting business with O'Brien.

The ability of suppliers to meet or exceed standards detailed in this Code will be taken into account by O'Brien when making procurement decisions. This will happen irrespective of whether the Code has been formally incorporated into a particular contract with the supplier. Where O'Brien procurement contracts set out more specific social, environmental and/or ethical requirements, this Code will supplement those provisions.

## Compliance with laws

Suppliers must comply with all applicable laws and conduct business in an ethical and responsible manner.

## Labour and human rights

At O'Brien, we respect and support responsible labour practices as set out in the UN Universal Declaration of Human Rights and the UN Global Compact. We expect suppliers to comply with all laws and respect and support the protection of human rights of workers, as well as individuals and communities affected by their activities.

### Modern Slavery

O'Brien opposes modern slavery and human trafficking in all of its forms, and expects the highest standards from its suppliers in this regard.

Suppliers must take reasonable efforts to ensure they or businesses within their own supply chain do not engage in modern slavery practices. Workers must not be required to surrender any government issued identification, passport or work permit or other personal document as a condition of employment.

Suppliers must comply with the [O'Brien Modern Slavery Policy](#). Suppliers must actively support the abolition of modern slavery by taking measures to identify, mitigate and raise awareness of modern slavery risks within their operations and supply chain. This includes exercising due diligence to reasonably assure that the minerals used in their supply chain are not supplied by businesses engaged in modern slavery.

### Child and Underage Labour

Child labour is strictly prohibited. Suppliers must not use children in modern slavery practices.

Suppliers must comply with all applicable international standards and domestic regulations relating to the employment of children.

### Non-discrimination

Suppliers must not engage in or support discrimination in hiring, employee advancement and employment practices, including on grounds of gender, age, religion, ethnicity, race, cultural background, disability, physical features, marital relationship status, sexual orientation, gender identity and expression, pregnancy or potential pregnancy, family responsibilities, political beliefs, industrial activity, union membership, irrelevant criminal record, nor personal association with a person who possesses or is thought to possess any of these attributes.

### Bullying, Harassment and Disciplinary Practices

Suppliers must provide a workplace free from the use of violence, threats of violence or other forms of physical coercion or harassment. Corporal punishment, mental, physical or verbal abuse, sexual harassment or sexual abuse, and harsh or inhumane treatment must be prohibited by suppliers.

### Freedom of Association

Suppliers must respect workers' freedom of association, recognise and protect their right to collective bargaining and to form, join and administer workers' organisations.

Suppliers shall not discriminate, harass, intimidate or retaliate against workers for being members of a union or participating in trade union activities, and provide worker representatives with access to their workplace.

### Wages, benefits and conditions

Suppliers must comply with applicable laws relating to wages and benefits (including minimum wages, overtime pay, and piece rates). Suppliers must pay workers in a timely manner. Suppliers must also comply with all laws related to working hours and legally mandated benefits.

## Health and safety

At O'Brien, the health and safety of our employees, contractors and visitors is of paramount importance - no job is so important or urgent that it cannot be done safely.

At a minimum, suppliers must provide a safe and healthy workplace and care for their workers and anyone that could be impacted by their activities by:

- Complying with all relevant laws related to Workplace Health and Safety.
- Developing and implementing written health and safety policies and standards.
- Developing and implementing documented systems to identify and record work related injuries and illnesses.
- Complying with O'Brien safety requirements.
- Taking reasonably practicable steps to identify workplace hazards and minimise the risk of workplace injury, illness and disease for workers.
- Having systems, training and emergency equipment in place to respond to and manage incidents and emergencies.

## Environmental considerations

O'Brien aims to reduce the direct environmental impact of its operations and that of the activities in its supply chain. Accordingly, O'Brien requires suppliers to act responsibly in managing the environmental impacts of their business operations.

O'Brien suppliers will:

- Comply with all relevant local and national laws and regulations on environmental laws.
- Implement an environmental management system.
- Strive to reduce environmental harm by minimising pollution (including greenhouse gas emissions) and waste.
- Ensure that all packaging supplied to O'Brien is sustainably sourced, made from recycled content and recyclable where possible.

*We respect human rights and are committed to preventing and ending all forms of modern slavery in our supply chain.*

## Business integrity

At O'Brien, we act with honesty and integrity and don't make or receive improper payments, benefits or gains. Accordingly, our suppliers must behave ethically, fairly and with integrity in all business transactions.

At a minimum, suppliers must:

- Comply with applicable anti-bribery and anti-corruption laws. All forms of corruption, extortion or embezzlement are strictly prohibited. Bribes or other means of obtaining undue or improper advantage must not be offered or accepted. This applies even if it is legal or common practice in a country.
- Conduct their business in full compliance with anti-trust and fair competition laws, and disclose information regarding business activities, financial situation and performance in accordance with applicable laws.
- Not directly or indirectly support organisations and individuals associated with illegal activities, human rights abuses or terrorism.
- Respect intellectual property rights of O'Brien;
- Comply with all applicable laws and regulations relating to sanctions, exports, re-export, import and trade controls.

## Privacy

Compliance with privacy laws is a non-negotiable part of how we work. Even if as a small business privacy laws do not apply to a supplier, that supplier will opt in to compliance with privacy laws. The [O'Brien Privacy Policy](#) at [www.obrien.com.au](http://www.obrien.com.au) outlines our privacy commitment and explains how we collect, use, disclose and protect our customers personal information. Suppliers must be aware of this policy and not do anything that would cause O'Brien to be in breach of it.

Suppliers must apply adequate data privacy and security protection to protect the personal information of our customers and employees from unauthorised access, use and disclosure. Suppliers who collect, use, store or have access to our customers' personal information must have adequate processes and procedures in place to monitor compliance with applicable privacy laws and contractual privacy obligations with O'Brien. This includes suppliers not doing anything which would cause O'Brien to be perceived as acting inconsistently with the O'Brien Privacy Policy.

## Monitoring and Compliance

O'Brien may at any time review or audit a supplier's compliance with this Code. In such event the supplier should co-operate by completing any self assessments and providing information, documents and access to staff, as O'Brien reasonably requires on a timely basis.

Suppliers must monitor their compliance with this Code, notify O'Brien of any significant breaches, allegations of non-compliance or investigation into non-compliance by authorities. Suppliers are expected to take all reasonable steps to address, remedy and prevent the reoccurrence of any breach of this Code.

## Enforcement

Where O'Brien has reasonable grounds to suspect a breach of this Code by a supplier, O'Brien may require the supplier to take additional steps which may include the provision of additional information or, in serious cases, submit to an independent audit at the supplier's premises at the supplier's cost.

We take this Code seriously and reserve the right to disqualify any potential supplier or discontinue business relationships with any current supplier which has failed to comply with this Code.

## Raising a Concern

O'Brien is committed to fostering a culture of honest and ethical behaviour. It is important to us that anyone can raise concerns and report suspected violations of this Code. Suppliers, their employees and subcontractors can raise concerns with:

- a) their O'Brien business points of contact, or
- b) in the event that a supplier or the supplier's employees or subcontractors do not feel comfortable doing this, they can report it anonymously to an independent third party whistleblowing service used by O'Brien by calling **1800 121 889**.

## Continuous Improvement

Suppliers are encouraged to go beyond compliance to applicable laws and take responsibility to continually improve social and environmental conditions and ethical behaviour.