



SUPPLIER AND CONTRACTOR CODE OF CONDUCT POLICY

Introduction

As an industry leader and responsible business Arnold Electrical & Data Installations Pty Ltd, Arnold Switchboards Pty Ltd ("Arnold") is firmly committed to conducting its business with the highest level of integrity and in compliance with legislative requirements and international agreements.

This Code of Conduct ("Code") sets forth Arnold's expectations of Suppliers and Contractors with whom it conducts business (including their affiliates or subsidiaries) with respect to responsible ethical, social, labour and environmental practices.

Where this Code refers to "Suppliers" this means suppliers, vendors and contractors that provide goods and or services to Arnold either directly or indirectly.

All Suppliers are expected to comply with this Code and communicate this within their own supply chains. All Suppliers must educate their representatives to ensure they understand and comply with this Code.

Where Arnold has arranged for the hire or appointment of a Supplier on behalf of a client then the Supplier must comply with this Code and also comply with all applicable rules of the client.

Anti-Bribery and Corruption

Arnold does not tolerate the giving or receiving of bribes, including the making of facilitation payments. It is expected that all partners/directors, employees and consultants working, whether directly or indirectly for or on behalf of Arnold comply with these principles in the performance of their services.

Arnold expects its Suppliers to comply with all applicable laws, statutes and regulations relating to anti-bribery and anti-corruption; including but not limited to state and commonwealth law, and to not engage in any activity, practice or conduct which would constitute an offence under such requirements. Arnold will not tolerate fraudulent or corrupt behaviour or engage in bribery or any form of unethical inducement or facilitation payments and will not tolerate any such behaviour from Suppliers.

Conflict of Interest

Suppliers must avoid all conflicts of interest or situations giving the appearance of a conflict of interest when conducting

business with Arnold. Suppliers must promptly report to Arnold, any instances of conflicts of interest such as a direct personal or financial interest in a business decision or Supplier selection.

In the same way a Supplier must not, without prior written agreement of Arnold, enter into any business relationship with any Partner/Director, employee or representative of Arnold that may create a conflict with their obligations to, and interests of Arnold.

Where a Supplier considers it may have a conflict of interest, it must immediately disclose the issue to Arnold in writing for Arnold's consideration.

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Labour and Modern Slavery

Arnold is fundamentally committed to ensuring that there is no slavery or human trafficking in its supply chains or in any part of the business. As a professional services supplier, Arnold works to provide its clients with the highest level of service attainable. Arnolds holds itself to the utmost standards of professional conduct and will accept nothing less from its Suppliers.

Suppliers are responsible for respecting and promoting human rights in their operations, products and/or services. Suppliers must follow the applicable laws in the countries in which they operate and must cooperate with Arnold in assessing supply chain risks.

"Modern Slavery" includes the crimes of human trafficking, slavery and slavery like practices such as servitude, forced labour, forced or servile marriage, the sale and exploitation of children, the deceptive recruitment of labour services and debt bondage.

Arnold requires Suppliers to consider the risks of Modern Slavery practices in their operations and supply chains and identify these where they are found to exist.

In respect to conditions of employment, in addition to any other legislative obligations, Suppliers must comply with the following specific requirements:

Child Labour

Suppliers must not engage in or condone the unlawful employment or exploitation of children within the workplace.

Suppliers must be committed to combating exploitation within their supply chains, by prohibiting any use of child labour in any supplier or other third-party arrangements.

Suppliers must co-operate with law enforcement authorities to address any such instances of child labour, that the Supplier becomes aware of.

Employment Relationship

Suppliers must respect the free choice of all persons and strictly prohibit forced or compulsory labour for any employees.

Suppliers must establish recognised employment relationships with their employees that are in accordance with their national laws and good practice.

Suppliers must not conduct business with, tolerate, or associate with organisations or entities that condone or are engaged in the practice of coercing or imposing work with little or no freedom of choice.

Suppliers must not avoid providing employees with their legal or contractual rights.

Working and Wages

Suppliers must comply with all state and commonwealth laws (and those in overseas jurisdictions as relevant) dealing with the wages the Supplier pays to employees and the hours that those employees work.

Suppliers should be committed to be an ethical employer that strives to improve labour standards, respects their employees and rewards them fairly.

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Discrimination

Suppliers must ensure that no discrimination is practised in their business and should have a written policy of equality for all in the workplace, with no discrimination on the basis of race, caste, religion, nationality, age, gender, marital status, sexual orientation, disability, union membership or political affiliation.

Safe and Secure Workplace

Suppliers must provide a safe and secure workplace for all employees, customers, and visitors. Suppliers must not tolerate physical violence and threats, corporal punishment, mental coercion, verbal abuse or sexual harassment within their business operations.

Freedom of Association

Suppliers must respect the rights of employees and comply with all laws concerning freedom of association and collective bargaining.

Diversity

Arnold encourages, values and is committed to a diverse workforce that includes people of varying gender, age, religion, race, ethnicity, cultural background, sexual orientation, education, abilities etc. and expects the same from its Suppliers. Suppliers must be committed to protecting their employees from discrimination and promoting diversity of their workforce, responding to changing demographics and working patterns.

Labour Hire

Suppliers who fall within the designation of providing labour hire, must ensure that they have appropriate licensing when providing labour to Arnold and/or the clients it represents, in accordance with the applicable state and commonwealth laws.

Environment

Arnold is committed to a program of continuous improvement to reduce any harmful impacts of its operation on the environment and to prevent pollution. Suppliers must minimise their environmental impact in the course of doing business and support and encourage others where it can be meaningful to do so. Arnold expects its supply chain to ensure compliance with relevant environmental legislation, as well as standards and codes specific to their industry.

All required environmental permits and registrations must be obtained, maintained and kept current by the Supplier at all times when conducting business with Arnold.

Health and Safety

Arnold expects its Suppliers to share its commitment to place workplace health, safety and the wellbeing of employees and others who could be affected by their activities, by implementing robust policies and procedures. Where Suppliers provide onsite services i.e. contractors, they are also required to observe the Arnold Contractor Health and Safety Guidelines whilst on premises that Arnold manages, which will be made available to them separately.

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Confidentiality

It is incumbent on Arnold to protect the confidential information of everyone Arnold does business with including clients, employees and Suppliers. Suppliers must comply with all relevant laws and regulations governing confidential or proprietary information and safeguard all such information received by or from Arnold. Suppliers must ensure that such confidential information is only used for authorised purposes and only share such information with authorised persons. Suppliers must consult with Arnold regarding any uses of confidential information.

Data Protection and Privacy

From time to time, Suppliers may have access to personal information about Arnold employees, its clients or others. Suppliers must treat this personal information properly and securely, regardless of how it is collected, recorded, stored, processed, disclosed, transferred and/or shared (whether on paper or in electronic format). Suppliers must comply with all applicable privacy and information security laws in relation to personal information.

Whistle Blowing

Arnold is committed to the highest standards of probity and accountability as regards to anti-bribery, corruption and ethical conduct. Arnold expects its employees and anyone with whom it conducts business, including Suppliers, who have serious concerns about these issues, to come forward and voice those concerns.

Reporting Concerns

Arnold expects each Supplier to report in a timely manner any known violations of this Code. Suppliers are encouraged to raise any questionable business practices or compliance concerns with Arnold. Arnold will not tolerate any retribution taken against any individual who has, in good faith, sought out advice or has reported questionable behaviour or a Code violation.

Code Compliance

Although Suppliers are expected to self-monitor their compliance with this Code, Arnold reserves the right to ensure that this Code is adhered to throughout its supply chain. This may include self-assessments, Arnold audits and third-party audits of Suppliers from time to time.

Where requested in writing, a supplier must permit Arnold representatives to assess their compliance with this Code.

Such assessments may include, but not limited to:

- the issuing and review of on-line questionnaires and surveys
- on-site inspection of the Supplier's facilities
- the review of related Supplier information; or
- an audit by a third-party consultant.

Arnold is committed to supporting its Suppliers and encourages open and honest discussions where a Supplier identifies that they may not be able to fully adhere to the Code. Arnold will work collaboratively with its Suppliers to explore solutions to these challenges.

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Compliance with Laws

In addition to any specific items mentioned elsewhere in this Code, Suppliers must comply with all relevant laws and standards in the jurisdiction in which they operate.

Review

This Code will be reviewed by Arnold periodically and may be updated from time to time.

Tony Arnold
Managing Director

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