

Supplier Code of Conduct

SG Fleet Group Limited
ABN 40 167 554 574

22 May 2022

Table of Contents

Supplier Code of Conduct	3
Ethical Business Practice	3
Anti-Competitive Conduct	4
Labour and Human rights	4
Work Health & Safety and Other Workplace Matters	5
Announcements & Confidentiality.....	5
Environment.....	5
Provision of Information	5
Document control	7

Supplier Code of Conduct

SG Fleet Group Limited and its subsidiaries (“the **Company**”) takes care in selecting suppliers of goods and services and expects them to operate to recognised national and, where applicable, international standards and appropriate codes of practice.

A supplier’s business practices and actions may impact upon the Company’s reputation and for this reason, suppliers are expected to work to the following standards of conduct.

The Company reserves the right to carry out regular assessments of the practices of its suppliers to ensure compliance with this Supplier Code of Conduct. The Company may at any time direct a supplier to cease providing goods or services to the Company where the supplier does not respond in a complete and open manner to our requests for information or where the standards as set out in this Supplier Code of Conduct are compromised in any way.

This Supplier Code of Conduct applies to goods and services provided by a supplier to any of the Company’s entities being SG Fleet Group Limited and its subsidiaries, which include:

Australia:	SG Fleet Australia Pty Limited ABN 15 003 429 356 NLC Pty Limited ABN 57 052 442 645 NLC Finance Pty Limited ABN 82 163 430 199 NLC Insurance Pty Limited ABN 64 104 847 252 Vehicle Insurance Underwriters Pty Limited ABN 85 063 264 371 SG Fleet Management Pty Limited ABN 50 108 174 296 LeasePlan Australia Limited ABN 57 006 923 011
New Zealand:	SG Fleet NZ Limited CN 1920318 LeasePlan New Zealand Limited CN 411131
United Kingdom:	SG Fleet UK Limited CN 06143809 SG Fleet Solutions UK Limited CN 04110984

Ethical Business Practice

Suppliers must:

- conduct business in an ethical, fair and professional manner;
- ensure that products, services and facilities are not used for or do not contribute to human trafficking or slavery or other exploitation;
- comply with all anti-bribery, anti-corruption and anti-money laundering laws;
- identify and comply with all other applicable laws, regulations, codes and standards;
- hold all necessary permits, licenses and authorisations necessary for providing the relevant goods and services to the Company;
- not directly or indirectly engage in fraudulent, corrupt or collusive activities;

- disclose, as soon as becoming aware of, and take reasonable steps to avoid, any conflict of interests (real or apparent);
- comply with the Company's stated systems for engaging suppliers and any procurement or tendering policies and procedures as specified;
- adhere to acceptable business practices with their own suppliers such as providing for timely payment.

Anti-Competitive Conduct

Suppliers must not engage in business practices that will restrict or limit competition. In particular Suppliers must:

- not discuss or reach an understanding or arrangement with a competitor about supplies, prices, terms, tenders, other competitors or other factors relevant to competition;
- never try to influence another supplier's or competitor's dealings with the Company;
- not take advantage of others' disadvantage by acting unfairly or unconscionably;
- not supply goods or services in a manner that contravenes the provisions of the *Competition and Consumer Act 2010* (Cth) or other applicable legislation;
- not pay or accept bribes or participate in other illegal inducements in business;
- employ fair business practices including accurate and truthful advertising.

Labour and Human rights

The Company believes that all workers in its supply chain deserve to be treated with dignity and respect. Suppliers are expected to provide a fair and ethical workplace, which upholds high standards of human rights.

Suppliers must:

- not discriminate against any worker based on age, disability, ethnicity, gender, marital status, political affiliation, race, religion, sexual orientation, gender identity, union membership, or any other status protected by law in any jurisdiction in which the Supplier operates, in hiring and other employment practices;
- commit to a workplace free from workplace bullying, harassment, victimisation, and abuse;
- ensure that all work is undertaken without coercion or any form of forced, bonded, indentured or involuntary labour;
- employ workers who are the applicable legal minimum age;
- ensure that all employees receive at least the legally mandated minimum wages, benefits and time off;
- follow applicable laws and regulation with respect to wages, working hours and working environment and conditions;
- ensure that any third party recruitment agencies it uses are compliant with the provisions of this code and any applicable law.

Work Health & Safety and Other Workplace Matters

Suppliers must:

- comply with all applicable workplace relations, work health and safety, and workers' compensation laws, regulations, codes and guidelines;
- where goods are consigned, packed, loaded or received as a part of the Supplier's business, do everything reasonably practicable to ensure that breaches of any heavy vehicle national laws (included but not limited to fatigue management; mass, dimension and loading; vehicle standards and maintenance) do not occur;
- provide a safe and healthy workplace for all employees, contractors and sub-contractors;
- notify the Company of any incidents and workplace health and safety performance issues associated with activities performed for the Company;
- comply with all obligations relating to the payment of employment related taxes or levies in respect of its employees which arise in respect of any amounts paid to the supplier by the Company;
- provide the Company with any information it reasonably requires to confirm compliance with workplace relations, work health and safety, and workers' compensation requirements;
- when on the Company premises, comply with the Company's work health and safety or security policies, practices and instructions.

Announcements & Confidentiality

Suppliers must:

- refrain from discussing the Company's business or other information pertaining to the Company (or our customers) in the media without our written consent;
- refrain from discussing the Company's business or other information pertaining to the Company (or our customers) with any third party, except where required to provide the Company with goods and services, without our written consent;
- refrain from including any reference to its role with the Company in any of its promotional or other advertising material without our prior written consent.

Environment

Suppliers must:

- operate in an environmentally responsible and efficient manner, and minimise adverse impacts on the environment;
- comply with all applicable environmental regulation including obtaining all required environmental permits, licences, information registrations and restrictions and following their operational and reporting requirements.

Provision of Information

With regards to information obtained or created in the course of providing goods and services to the Company or to our customers, Suppliers must:

- maintain adequate records and documentation that accurately record all transactions and information regarding business activities with the Company and make this information available to the Company on request;
- provide timely and accurate disclosure of or access to material or other information, including with regards to a supplier's policies of insurance, as requested by the Company;
- not give false or misleading information to the Company;
- notify the Company of any breach of this Supplier Code of Conduct of which the Supplier is, or becomes aware.

By complying with the requirements outlined in this Supplier Code of Conduct, Suppliers will be able to advance their business objectives and interests in a fair and ethical manner. All of the Company's Suppliers are required to comply with this Supplier Code of Conduct and accordingly, doing so will not disadvantage a Supplier in any way in their dealings with the Company.

Document control

Document Identification Number: SGF-PSM-POL-002

Classification: Public

Document owner: Procurement and Supplier Operations

Document approver: the Board

Date of next review: 2023.05.21

Revision history

Version	Date of revision	Updated by	Description of change	Approval reference
V1.0	2013.01.24		24012013 Version	
V2.0	2017.12.31		20171231 Version	
V3.0	2019.03.11		20190311 Version	ISO Approval IMS SGISO-400
	2021.06.24	Brad Sayer	Annual review – no changes required.	ISO Approval IMS SGISO-771
V4.0	2022.05.12	Brad Sayer / Tawanda Mutengwa	- Updated list of entities within the Group. - Changed document format into standard ISO document template. - Updated document ID to standard ISO ID	ISO Approval IMS SGISO-961