

Supplier Code of Conduct Bedford Group Ltd

1. Background

Bedford Group Ltd ABN 34 158 717 447 ("**Bedford**" and "**Company**") and the Bedford Group are committed to upholding ethical standards in regard to its operations and those it does business with.

Bedford's purpose is to support people with disability to live the life that they choose, and Bedford's mission is to provide people with disability with a diverse range of skill-building opportunities, from social activities through to supported or open employment. Bedford's values of integrity, safety, innovation, teamwork and quality underpins every aspect of the Company.

Third parties such as suppliers, contractors, subcontractors and consultants are integral to Bedford's operations. It is essential that third parties connected to the Company share its values, principles and commitments which are outlined in this Supplier Code of Conduct ("**Code**").

2. Application of this Code

The Code applies to third parties connected to Bedford including Bedford's suppliers, subcontractors, contractors and consultants including all employees, contractors and subcontractors of third parties engaged to supply goods or services to Bedford ("**Suppliers**"). This extends to all applications and geographical locations.

The expectations outlined in this Code are not intended to supersede or alter the Supplier's regulatory and contractual obligations. In the event that a Supplier has entered into an agreement with Bedford, where there is any inconsistency between a term of this Code and a term of the agreement, the term of the agreement will prevail to the extent of that inconsistency.

3. Bedford's Expectations

Bedford expects Suppliers to read this Code. Bedford expects Suppliers to communicate this Code to their related entities and their suppliers so they are aware of, understand and comply with the Code.

Bedford is committed to fostering an open and collaborative relationship with its Suppliers. Bedford encourages Suppliers to raise concerns or ask questions and aims to create a safe environment to do so.

If there are any questions regarding the matters outlined in this Code, Bedford encourages discussion in accordance with the procedures outlined in paragraph 14.

4. Compliance with Laws

Suppliers must comply with the laws in the countries where they operate.

5. **Labour and Human Rights**

Bedford supports human rights as set out in the Universal Declaration of Human Rights and the ten principles of the UN Global Compact. Further, Bedford is a reporting entity pursuant to the *Modern Slavery Act 2018* (Cth).

The Company expects Suppliers to protect the human rights of workers by offering respect and support. Bedford expects Suppliers to:

- ensure all work is freely chosen without the use of modern slavery including forced, prison or compulsory labour;
- ensure workers are of legal age, preventing any form of child labour;
- ensure no payment of recruitment fees by workers;
- ensure bullying, harassment, discrimination, physical, sexual, psychological or verbal harassment is not tolerated in their organisation;
- pay workers lawful wages, including equal pay for equal work;
- provide fair working conditions for their employees, including adequate rest periods, sufficient leave, freedom of association and collective bargaining in accordance with local laws; and
- provide Bedford with information requested by Bedford, work with Bedford to implement initiatives to meet any targets set by Bedford and assist Bedford with compliance with its reporting requirements.

If Suppliers become aware of a labour incident within their business or supply chains, they must disclose it to Bedford in accordance with the procedure set out below under the "Contact Procedure" heading at paragraph 14. Bedford will endeavour to work alongside the Supplier to resolve any incidents.

6. **Health and Safety**

Under Work, Health and Safety legislation, Bedford is required to provide a safe work environment and therefore must be diligent in considering employee safety. The goal for Bedford is to provide a safe, healthy and secure work environment within its operations and throughout its supply chains.

To achieve this goal, Suppliers must also provide a safe and healthy workplace for their workers and anyone that could be impacted by their activities. This requires Suppliers to:

- take reasonable steps to identify workplace hazards and minimise the risk of workplace injury, illness and disease;
- provide appropriate equipment, resources, instruction, education and training for workers to safely carry out their duties;
- provide personal protective equipment;

- implement effective systems to ensure products and services meet relevant standards and legislative requirements; and
- ensure facilities and amenities for workers (including any accommodation provided) are clean, safe and meet their basic needs.

In conjunction with the requirements above, Bedford also expects that Suppliers:

- support workers to raise health and safety issues or concerns without fear of disciplinary action, dismissal or discrimination;
- prepare for, respond to, manage and report workplace incidents, injuries or emergencies;
- ensure all its employees attend work free from the influence of illegal drugs and alcohol, and in a condition to perform their duties; and
- have systems, training and emergency equipment in place to effectively respond to and manage incidents and emergencies; and
- adhere to Bedford's safety requirements at all Bedford sites, where applicable.

For more information about Bedford's commitment to providing a safe and healthy workplace, please refer to the Bedford WH&S Policy.

7. **Environmental Considerations**

In this clause:

- **"Greenhouse Gas Emissions"** means the natural and anthropogenic gases which trap thermal radiation in the earth's atmosphere as specified from time to time in the Kyoto Protocol, each expressed as a total in units of carbon dioxide equivalent (CO₂e-).
- **"Kyoto Protocol"** means the Kyoto Protocol to the United Nations Framework Convention on Climate Change.

Bedford strives for a sustainable future, and as such, the organisation is committed to minimising the impact on the environment from its business operations.

Bedford may implement environmental targets and initiatives to assist in managing and reducing the environmental impacts of its operations and value chains. Suppliers are expected to assist Bedford in meeting any environmental targets set by Bedford and to meet any mandatory environmental reporting requirements. This may include, but is not limited to, the Supplier:

- providing information to Bedford relating to the Suppliers:
 - o Greenhouse Gas Emissions; and / or
 - o energy use, water use, raw material use, chemical use and waste for the purposes of calculating the Supplier's Greenhouse Gas Emissions;

- assisting Bedford in obtaining the above information from the Suppliers' suppliers; and
- working with Bedford to reduce the Suppliers' Greenhouse Gas Emissions.

More broadly, Suppliers are expected to:

- take all reasonable steps to minimise any adverse environmental impacts on their operations, products and services;
- comply with applicable environmental laws, standards and notices from regulators; and
- obtain, maintain, keep current and comply with necessary environmental permits, approvals and registrations.

For further information on Bedford's position on environmental and sustainability considerations, please refer to 'Bedford's Environmental Policy'.

8. **Diversity and Equal Opportunity**

Bedford is committed to practices that promote a compassionate, respectful and just community in which all people participate and flourish. The Company is committed to being a diverse and inclusive workplace. Bedford encourages Suppliers to have an inclusive workplace free of discrimination based on gender, age, race, nationality or ethnic origin, disability, family responsibilities, marital status, medical history, political views, pregnancy or potential pregnancy, religious beliefs or activity, sexuality or sexual orientation, union affiliation, physical appearance, social original or carers' responsibilities.

For further information about Bedford's commitment to diverse and equal opportunity, please refer to 'Bedford's Diversity Policy'.

9. **Business Integrity**

Bedford pursues high standards of conduct and promotes good corporate governance and ethical behaviour. Bedford does not receive improper payments, benefits or gains. Bedford expects Suppliers to act ethically, honestly and transparently in their dealings with the Company. Suppliers must:

- avoid actual, potential or perceived conflicts of interest with Bedford employees;
- never engage in bribery or corruption;
- never offer, give or promise anything of value directly or indirectly to a government official to influence official action;
- ensure any gifts and hospitality offered or received are reasonable, appropriate, not overly frequent and for legitimate business purposes only;
- follow relevant competition laws and promote fair behaviour;

- comply with data privacy and regulatory requirements when personal information is collected, stored, processed, transmitted or shared;
- respect Bedford's confidential information and not disclose it, except as required by law or where authorised in writing by Bedford; and
- ensure the protection of whistleblowers.

10. **Confidentiality**

Suppliers must not improperly use any private, confidential or commercially sensitive information in its possession relating to or in connection with its dealings with Bedford.

Suppliers must not present any information to any third party, including but not limited to media or news outlets, on behalf of Bedford without express approval from Bedford.

11. **Information Requests**

Bedford may make specific information requests to its Suppliers from time to time surrounding the Supplier's business, operations and value chain including, but not limited to, the following information surrounding the Suppliers':

- internal governance structures, including any relevant policies and procedures;
- Greenhouse Gas Emissions, Greenhouse Gas Emissions reduction targets and broader environmental information;
- supply chain data and due diligence processes; and
- broader environmental, social and governance risks associated with the Supplier.

12. **Auditing**

Suppliers agree to cooperate and permit Bedford to request an audit to ensure compliance with this Code. Bedford may ask Suppliers to provide Bedford with a copy of the audit report from the most recent audit that has been undertaken at the Supplier's site. If a recent audit report is not available, or if Bedford otherwise decides to do so, Bedford may seek a separate audit to be undertaken at the Supplier's site.

Bedford shall provide reasonable advance notice to the Supplier before conducting any audit unless an urgent situation (to be determined at Bedford discretion) requires immediate investigation (for example, if through Bedford due diligence process, serious risk for modern slavery and human rights breaches are identified, an urgent audit may be organised by Bedford). Audit requests may be conducted periodically or as deemed necessary by Bedford.

Audits may cover, but are not limited to, areas such as labour practices, environmental compliance, ethical business conduct, health & safety standards, and any other relevant aspects outlined in this Code.

13. **Reporting Misconduct, Unethical Behaviour or Suspected Corruption**

If a Supplier or employee considers that it or another Supplier or employee has deviated from or breached their obligations under this Code, it is expected to report these concerns according to the procedure outlined in the Bedford Whistleblower Policy.

Bedford reminds Suppliers that by agreeing to the Code they have an ongoing obligation while supplying goods and services to Bedford to report any compliance concerns.

14. **Contact Procedure**

Any notifications, questions or concerns in relation to this Code or any other matter not raised but related to this Code can be made to the Bedford Group Governance email address: governance@bedfordgroup.com.au

Additionally, you can report in accordance with the Bedford Whistleblower Policy.