

MANUAL

Supplier Code of Conduct

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1. Introduction

Best Bar is committed to ethical, sustainable and socially responsible procurement and we expect the same high standards of our Suppliers. We view our Suppliers as partners and we care about the way they do business when providing goods or services to Best Bar.

The Supplier Sustainable sourcing document describes the minimum expectations in the areas of: integrity, ethics and conduct; conflict of interest, gifts, benefits and hospitality; corporate governance; labour and human rights; health and safety; and environmental management.

Suppliers to Best Bar are encouraged to review the Code and ensure that relevant areas of their business and supply chain meet these standards.

2. Our Role

Best Bar seeks to engage in long-term relationships with Suppliers that are committed to sustainable development. Our goal is to partner with Suppliers to deliver value-added procurement for the Group and our customers, and to demonstrate responsible supply chain management.

2.1 Business Conduct

When carrying out procurement duties and responsibilities, all Best Bar employees are expected to share with Suppliers the company's commitments to high legal, ethical and moral standards. Our internal guidance sets norms of behaviour in procurement activities in the areas of courtesies, conflict of interest, corruption, competition law and confidential information. Best Bar employees are encouraged to continually consider and discuss issues of ethical behaviour.

2.2 Supplier Relationship Management

Best Bar has established methodologies to conduct reviews to guide relationships with Suppliers. These guidelines ensure a fair, competitive and transparent negotiation process, according to our policies and values.

3. Supplier Expectations

3.1 Integrity ethics and conduct

Best Bar expects high standards of ethical conduct and compliance with all applicable laws. Suppliers are expected to be ethical in their business activities, including relationships, practices, sourcing and operations.

3.1.1 Business integrity

Suppliers are expected to comply with all anti-bribery, anticorruption and anti-money laundering laws. Suppliers must not engage in, either directly or indirectly, fraudulent, corrupt or collusive activities.

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3.1.2 Record keeping and documentation

Suppliers are expected to maintain adequate records that accurately record all financial transactions and information regarding its business activities, labour, health and safety and environmental practices in accordance with applicable laws, policies and procedures. Disclosure of information is expected to be undertaken without falsification or misrepresentation.

3.1.3 Professional conduct

Suppliers are expected to conduct themselves in a manner that is fair, professional and that will not bring Best Bar into disrepute.

3.1.4 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 Best Bar.

3.2 Conflict of interest; gifts, benefits and hospitality

Best Bar believes that all business activities should be undertaken with impartiality and any conflict of interest should be raised and managed.

3.2.1 Conflict of interest

Suppliers must:

- a) declare to the relevant appointed Best Bar manager under their contract, or the primary Best Bar contact in relation to the goods or services or construction works and services being provided, any situation that raises an actual, potential or perceived conflict of interest related to or in connection with its dealings with Best Bar; and
- b) avoid financial, business or other relationships which may compromise the performance of their duties under their business arrangement with Best Bar. Under the Best Bar code employees are expected to avoid actual, perceived and potential conflicts of interest wherever possible. Any conflicts of interest that cannot be avoided are expected to be declared and managed appropriately.

3.2.2 Gifts, benefits and hospitality

Best Bar personnel must:

- a) conduct themselves with the highest standards of integrity, impartiality and accountability; and
- b) perform company duties without favouritism, bias or for personal gain.

The appropriate handling of offers of gifts, benefits and hospitality is critical to earning and sustaining company trust. As such, Suppliers are expected not to:

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- a) offer Best Bar personnel gifts or benefits, either directly or indirectly, and offers of hospitality will be limited to token offers of basic courtesies (such as tea and coffee during a meeting); or
- b) take any action in order to entice or obtain any unfair or improper advantage.

3.3 Corporate Governance

Commitment to sound management administration, risk and corrective action systems, are key to a reliable supply chain for Best Bar. Suppliers are expected to maintain sound administration processes.

3.3.1 Risk assessment and management

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 labour and human rights, health and safety, the environment, business ethics, and corporate governance.

3.3.2 Critical incident management

Suppliers should:

- a) identify and assess potential critical incident, emergency situations and business continuity risks; and
- b) develop and implement emergency plans and response procedures that minimise harm to life, environment and property, while minimising disruption to business continuity.

3.3.3 Audits and assessments

To ensure compliance with this Code and the applicable laws, Suppliers are expected to:

- a) perform periodic evaluations of their facilities and operations, and the facilities and operations of their subcontractors; and
- b) co-operate openly and honestly with any Best Bar audit, assessment or review.

3.4 Labour and Human Rights

Best Bar 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 and integrates appropriate labour and human rights policies and practices into its business.

3.4.1 Anti-discrimination

Subject to applicable laws, Suppliers are expected not to discriminate against any worker based on age, disability, ethnicity, gender, marital status, political affiliation, race, religion, sexual

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orientation, gender identity, union membership, or any other status protected by law, in hiring and other employment practices.

3.4.2 Anti-harassment

Suppliers are expected to commit to a workplace free from workplace bullying, harassment, victimization and abuse. Suppliers are expected not to bully workers or threaten workers with, or subject them to, unlawful or inhumane treatment. This includes, but is not limited to, abuse and harassment which can be verbal, physical, sexual or psychological.

3.4.3 Human rights

Suppliers are expected to provide goods and services in a manner consistent with any applicable human rights obligations.

Prevention of involuntary and underage labour Suppliers are expected to:

- a) ensure that all work is undertaken without coercion;
- b) not use any form of forced, bonded or indentured labour; and
- c) employ only workers who are the applicable minimum legal age.

All use of temporary and outsourced labour should be within the limits of the law. Suppliers are therefore expected to:

- a) use all reasonable endeavours to ensure that the third-party recruitment agencies it uses are compliant with the provisions of this Code and applicable law; and
- b) be responsible for payment of all recruitment-related fees and expenses in recruiting foreign contract workers either directly or through third party agencies.

3.4.4 Working hours, wages and benefits

Suppliers must:

- a) follow all applicable laws and regulations with respect to wages, working hours and workers compensation insurance;
- b) ensure that all workers receive their legally mandated minimum wages, benefits, superannuation, leave entitlements and time off for legally recognised holidays; and
- c) pay workers' wages as required under applicable laws in a timely manner and not be expected to use wage deductions as a disciplinary measure. All overtime is expected to be reasonable and paid at the rate and in accordance with the applicable laws.

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3.4.5 Freedom of association and collective bargaining

Suppliers are expected to freely allow workers to associate with others, form and join (or refrain from joining) industrial organisations or associations of their choice and bargain collectively, or engage in any lawful industrial activity without interference, discrimination, retaliation or

3.5 Health and Safety

Worker health, safety and well-being is important to Best Bar. Suppliers are expected to provide a healthy and safe work environment and integrate sound health and safety management practices into its business.

3.5.1 Workplace health and safety management

Suppliers must comply with all applicable laws relating to workplace health and safety. Suppliers are expected to:

- a) manage occupational health and safety hazards; and
- b) provide workers with job-related training and consult with employees in relation to the provision of information and training.

3.5.2 Environmental Management

Best Bar is committed to promoting environmental responsibility. Suppliers are expected to minimise the environmental impact of their operations and maintain environmentally responsible policies and practices.

3.5.3 Environmental impacts

Suppliers must comply with all applicable laws and regulations relating to the environment, including any management and reporting obligations. Suppliers are expected to manage the environmental impact of their operations by:

- a) ensuring the safe storage, transportation and disposal of hazardous substances including hazardous waste;
- b) maintaining policies and practices for the efficient use of energy, water and natural resource consumption; and
- c) maintaining policies and practices that reduce the risk of pollution, loss of biodiversity, deforestation, damage to ecosystems and greenhouse gas emissions

4. Referencing Documents

ISO 20400:2017 Sustainable Procurement

ISO 2600:2010 Social Responsibility

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QMMN1:0001 Quality Manual

SEPR1-0009 HSEQ Procurement

SCF01-0005 Supplier Accreditation Form