# Winsome Resources Limited

# Supplier Code of Conduct

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## 1 Applicability

A reference to **Winsome** in this Supplier Code of Conduct (the **Code**) is a reference to:

(a) Winsome Resources Limited (ABN 77 649 009 889) (**Company**) and each of its subsidiaries (together the **Group**); and

(b) any joint ventures under a Group company's operational control.

This Code applies to Winsome's service providers, suppliers and third-party contractors (**Suppliers**).

All Suppliers will be provided with access to a copy of this Code via the Company's website. This Code should be read in conjunction with the Company's suite of Corporate Governance Policies, all of which are available on the Company's website.

## 2 Purpose and objectives

Winsome is committed to respecting human rights throughout its business, and to upholding the laws and regulations of the countries in which it operates.

Human rights are fundamental principles of personal dignity and universal equality. Respect for human rights fosters social progress, better standards of life and greater freedom for individuals.

The purpose of this Code is to provide standards required of the Company's Suppliers in relation to the following:

(a) health and safety;

(b) environment; and

(c) social and governance – legislation, anti-bribery and anti-corruption, modern slavery.

Winsome procures a variety of goods and services from a diverse supplier base and looks to partner with Suppliers who share Winsome's safety, environmental, social and governance standards.

Winsome will actively seek and show preference to Suppliers who respect and adopt positive safety, environmental, social and governance standards and who demonstrate alignment with the standards contained in this Code.

## 3 Supplier compliance requirements

| Area of compliance | The Supplier is required by Winsome to: |
|---|---|
| Health and Safety | • comply with the principles set out in Winsome's Occupational Health and Safety Policy relevant to work completed as part of the supply contract with Winsome. |
| Environment | • comply with the principles set out in Winsome's Environmental Policy when supplying goods and services to Winsome. |
| Governance – compliance with the law | • comply with all laws and regulations relating to the conduct of their business in all countries in which the Supplier operates. This includes complying with the intent and spirit of the law, where it is clear. Examples are labour and tax laws, laws dealing with the protection of the environment and health and safety in the workplace, and laws protecting the heritage of indigenous people in the communities in which Winsome operates. |
| Governance – Anti-Bribery and Anti-Corruption Policy | • comply with the principles set out in Winsome's Anti-Bribery and Anti-Corruption Policy when supplying goods and services to Winsome. These prohibit the provision or offering of anything of value to government officials, representatives, political parties or third parties for the purpose of influencing any act or decision in violation of the recipient's lawful duty or securing or attempting to secure an improper legal or commercial advantage. They also require the operation of effective controls and the maintenance of accurate books and records. |
| Governance – Community Relations Policy | • comply with the principles set out in Winsome's Community Relations Policy when supplying goods and services to Winsome. |
| Governance – Modern Slavery<br>Forced or compulsory labour | • confirm in the supply contract with Winsome that to the best of the Supplier's knowledge and belief, there is no deceptive recruiting, bonded, involuntary or other type of forced labour or deprivation of liberty between the Supplier and its employees; and<br>• require its sub-contractors to confirm in the contracts between the Supplier and its sub-contractors that there is no bonded, involuntary or other type of forced labour or deprivation of liberty between the subcontractor and its employees. |
| Governance – Modern Slavery<br>Child Labour | • not employ children to work before completing their compulsory education under the laws in which the children live. The minimum age for entry into employment must not be younger than 16 years of age, (other than casual or part-time work outside school hours and within the requirements of the local labour laws for working hours); and<br>• require its sub-contractors to confirm in the contracts between the Supplier and the sub-contractor that these provisions are included and observed by the sub-contractor in relation to the sub-contractor's employees. |
| Governance – Modern Slavery<br>Living Wage | • satisfy, at a minimum, national legal standards or local industry benchmarks, whichever is higher, for wages and benefits paid for a standard working week;<br>• seek to establish a living wage for its employees in nations where no minimum wage legislation operates, which provides an adequate standard of living for all its employees and their immediate financial dependants; and |

| Area of compliance | The Supplier is required by Winsome to: |
|---|---|
| | • require its sub-contractors to confirm in the contracts between the Supplier and the sub-contractor that these provisions are included and observed by the sub-contractor in relation to the sub-contractor's employees. |
| Governance – Unions | • be respectful towards the legitimate activities of trade unions and allow workers' representatives to carry out their legitimate representative functions in their workplace without retaliation or discrimination. |
| Social and Governance - Code of Conduct and Diversity Policy | • not base decisions regarding employment on attributes unrelated to job performance (including but not limited to, race, colour, gender, religion, personal associations, national origin, age, disability, political beliefs, marital status, sexual orientation and family responsibilities or military service responsibilities);<br>• in certain cases, it is acceptable to apply positive discrimination targets to promote local or indigenous employment or increased female participation, provided that all employment and internal promotion offers are based on merit and the actions are lawful;<br>• provide a work environment in which the Supplier's employees are treated fairly, and where cultural, ethnic, religious and gender factors are respected;<br>• not impact on the health, safety or wellbeing of Winsome employees and Winsome's other contractors and suppliers with violence, threatening behaviour, or verbal or psychological harassment, abuse or disrespect, whilst supplying goods and services to Winsome;<br>• give due consideration to diversity and inclusion in selecting the team of people to supply goods and services Winsome, having regard to Winsome's Diversity Policy; and<br>• require its sub-contractors to confirm in the contracts between the Supplier and the sub-contractor that these provisions are included and observed by the sub-contractor in relation to the sub-contractor's employees where involved in supplying goods and services to Winsome. |

## 4 Review of this Code and responsibilities

The Board has approved this Code, and the oversight of this Code is the responsibility of the Board. The Board will review this Code at least annually and make any necessary amendments with the aim of continual improvement in overall risk management.

### 4.1 Board

The Board is responsible for:

(a) approving, reviewing and amending this Code, as required;

(b) implementing this Code in all the Company's entities, and using its influence to encourage equivalent policies in other entities which it has a significant investment or with which it has a significant business relationship;

(c) monitoring the effectiveness of this Code;

(d) providing leadership, guidance and, advice to promote compliance with this Code.

### 4.2 Managing Director and senior management

The Managing Director and other members of senior management are responsible for:

(a) providing leadership, guidance, and advice to promote compliance with this Code;

(b) designing and implementing training and awareness programs on this Code; and

(c) reporting to the Board as appropriate.

### 4.3 Personnel

All personnel of Winsome and who procure external services are responsible for contracting goods and services and must ensure this Code is effectively implemented.

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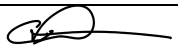
| **Approved by:**  | **Last review date:** **12 June 2024** |

C Evans
Managing Director