

Allens Supplier Code of Conduct

Allens aims to uphold the highest standards of quality and integrity, and to ensure that our procurement practices are ethical, and environmentally and socially responsible. We support and respect the protection of internationally proclaimed human rights and we are committed to providing a fair and safe workplace, where our people are treated with dignity and respect. As a purchaser of products and services, we also aim to reduce adverse impacts and identify opportunities within our supply chain to drive positive social and environmental change.

1 Our expectations

Suppliers must:

- (a) comply with the minimum standards set out in this Supplier Code of Conduct (**Code**); and
- (b) take reasonable steps to ensure that the Supplier's associated entities, sub-contractors and suppliers who are involved in the provision of products and services to or on behalf of Allens, also understand and comply with the minimum standards in this Code.

We encourage Suppliers to demonstrate a process of continuous improvement and exceed these standards where possible.

Supplier means any organisation or individual that provides a product or service or undertakes an activity for or on behalf of Allens or its associated entities, either directly or indirectly.

Worker includes employees, agents or contractors who work for or with a Supplier.

2 Our commitments

This Code takes into account and reflects our commitment as a signatory to the United Nations Global Compact, to operating responsibly in line with the Compact's ten principles relating to human rights, labour, environment and anti-corruption.

We also seek opportunities to support First Nations-owned businesses and the employment of Aboriginal and Torres Strait Islander people in line with commitments made in our First Nations Engagement Plan and through our membership of Supply Nation.

3 Governance and ethical business practices

We expect Suppliers to conduct their business in a lawful, ethical and fair manner.

At a minimum, Suppliers must comply with the following:

- (a) **Comply with laws.** Suppliers must comply with all applicable laws, rules and regulations.
- (b) **Unethical and illegal business practices must be prevented.** Suppliers must prevent and must not engage in unethical and illegal business practices, including but not limited to fraud, tax evasion, money laundering, sanctions violations or circumvention, insider trading, bribery, corruption, facilitation payments (small payments made to public officials to secure or expedite routine governmental actions to which the payer is already legally entitled), and other improper payments, benefits or gifts.
- (c) **Conflicts of interest must be avoided.** Suppliers must avoid conflicts of interest in their work with us and must immediately disclose any known family or other close personal relationships with our people who have an influence over their engagements with us.

- (d) **Privacy and confidentiality must be protected.** Suppliers must protect personal data and confidential information and comply with all applicable laws relating to data protection and privacy. Suppliers must keep all information received about Allens, its associated entities, its clients and its people confidential. For the avoidance of doubt, any use of artificial intelligence tools in connection with products or services provided to us must comply with these obligations and align with Allens' [AI principles](#).
- (e) **Protect whistleblowers.** Suppliers must comply with any applicable laws regarding whistleblower policies and protection. Reporting mechanisms must be accessible and well-publicised.

4 Social responsibility

We expect Suppliers to support and uphold human rights and not be complicit in human rights abuses.

4.1 Human rights

At a minimum, Suppliers must comply with the following:

- (a) **All work must be voluntary.** Suppliers must not use any form of forced, bonded or compulsory labour, or engage in other forms of slavery or human trafficking and must take appropriate steps to ensure that no such labour is used in their supply chain. Workers must not be required to:
 - (i) surrender any government issued identification, passport or work permit or other personal document as a condition of employment;
 - (ii) provide any financial deposit, payment or other monetary guarantee as a condition of their employment; or
 - (iii) pay employers' or agents' recruitment or other fees.

All work must be voluntary, and Workers must be free to leave the workplace and to terminate their employment on providing reasonable notice in accordance with applicable laws and regulations

- (b) **Child labour must not be used.** Suppliers must not use child labour, where **child** means any person under the age of 15, under the age for completing compulsory education, or under the minimum age for employment in the relevant country in which the work is being performed, whichever is greatest. Suppliers must ensure that Workers under 18 years of age do not perform work that is likely to be hazardous, including work involving dangerous machinery or heavy loads, exposure to hazardous substances, temperatures or noise levels, or work involving night shifts or excessive overtime. Suppliers must also ensure that work does not interfere with Workers' education or be harmful to their health or physical, mental, spiritual, social or moral development.
- (c) **Freedom of association and the right to collective bargaining must be respected.** Workers must be permitted to associate freely, bargain collectively and seek representation in accordance with applicable laws and regulations, and must be free from any discrimination, harassment, intimidation or victimisation for choosing to engage in such activities. Suppliers must also provide Workers with a mechanism to confidentially report grievances without fear of penalty, reprisal or harassment.
- (d) **Fair wages must be paid.** Workers must be compensated in accordance with all applicable laws, regulations and industrial instruments, including those relating to minimum wages, overtime and legally mandated benefits. Workers must be paid in full and on time.
- (e) **Fair working hours must be observed.** Suppliers must ensure that working hours are not excessive or unreasonable, having regard to the nature of the relevant role. Suppliers must comply with all applicable laws, regulations and industrial instruments, relating to working hours, including those concerning breaks, days of rest, overtime, leave and any applicable legal right to disconnect.
- (f) **Procurement practices must be responsible.** Suppliers must consider their own procurement practices (eg, pricing, order planning and payment times) and ensure those practices are fair and do not unduly increase the risk of forced, bonded or compulsory labour or other forms of slavery or human trafficking being used further down the supply chain.
- (g) **Reporting obligations must be observed.** Suppliers must comply with any applicable reporting or disclosure obligations (eg, under the *Australian Modern Slavery Act 2018*).

4.2 Labour and workplace practices

At a minimum, Suppliers must comply with the following:

- (a) **Workers must be treated with respect and dignity.** Suppliers must prohibit the use of physical, verbal, sexual or psychological harassment, bullying, abuse, cruelty, degrading treatment or punishment, or other forms of intimidation of Workers. Suppliers must investigate misconduct promptly, remediate appropriately and support victims.
- (b) **Workers must be treated equally.** Suppliers must:
 - (i) prohibit unlawful discrimination in the workplace and in all employment decisions, including those relating to recruitment, remuneration, allocation of work, promotion and termination on the basis of attributes protected by applicable law. These include, but are not limited to, race, colour, sex, sexual orientation, gender identity and expression of intersex status, age, disability, marital or family status, family or carer's responsibilities, pregnancy or breastfeeding, religion, union membership, political belief or any other legally protected attribute; and
 - (ii) comply with all applicable laws and regulations relating to diversity and inclusion including the *Australian Workplace Gender Equality Act 2012*.
- (c) **Working conditions must be safe and healthy.** Suppliers must:
 - (i) comply with all applicable health and safety laws and regulations relating to their products, services and operations;
 - (ii) provide Workers with a safe and healthy working environment and maintain safe systems of work; and
 - (iii) provide Workers with appropriate tools, equipment and training to carry out their duties.

We encourage Suppliers to demonstrate a commitment to diversity and inclusion, including in relation to gender, gender identity, sexual orientation, disability, socio-economic background and cultural diversity, and to have a strategy and policy to reflect this commitment.

5 Environment and climate

At a minimum, Suppliers must comply with the following:

- (a) **Comply with environmental laws.** Suppliers must comply with all applicable laws and regulations relating to environmental protection, management and reporting, and obtain, maintain, keep current and comply with necessary environmental permits, approvals and registrations.
- (b) **Adverse impacts must be identified and minimised.** Suppliers must maintain an environmental management plan or framework that identifies the Supplier's material environmental impacts, including impacts relating to greenhouse gas emissions, biodiversity, pollution and waste, and actions to minimise these impacts, including the efficient use of energy, water and natural resources and the use of clean technologies.
- (c) **Environmental responsibility must be promoted.** Suppliers must act to avoid or minimise the environmental impacts of the Supplier's products or services throughout their lifecycle.

We encourage Suppliers to:

- set greenhouse gas emissions reduction targets in line with climate science, implement measures to reduce these emissions and report on the greenhouse gas emissions associated with products and services provided to or on behalf of Allens; and
- identify opportunities and innovative solutions to reduce the lifecycle impacts of products and services provided to or on behalf of Allens, including with respect to energy efficiency, recycling, use of recycled content and sustainable packaging.

6 Supplier diversity and inclusion

Allens promotes supplier diversity and economic inclusion by identifying opportunities to support and work with Suppliers owned by underrepresented groups including First Nations-owned businesses and social enterprises.

We encourage Suppliers to promote inclusion and diversity within their own supply chains.

7 Compliance and remediation

- (a) Suppliers must:
 - (i) monitor compliance with this Code;
 - (ii) notify us as soon as reasonably practicable of any actual or suspected breach; and
 - (iii) take prompt and reasonable steps to address, remedy and prevent repetition of any breach.
- (b) We reserve the right to:
 - (i) verify compliance with this Code and Suppliers must cooperate and provide supporting evidence as we may reasonably require. This may include completion of self-assessment questionnaires, requests for further information and documentation, site visits or audits by us or our agents; and
 - (ii) terminate our business relationship with the Supplier in the event of ongoing or repeated breaches.
- (c) Suppliers must ensure that there is no sub-contracting of material obligations, unless approved by us.
- (d) We may amend this Code from time to time to reflect legal and regulatory changes and changes in industry best practice.

8 Information and notification

If you would like to raise a concern or notify us of an actual or suspected breach of this Code, please contact us at ResponsibleSourcing@allens.com.au.

9 Declaration

Please arrange for a duly authorised representative of the Supplier to complete and sign this declaration and return it to ResponsibleSourcing@allens.com.au.

I have read and fully understood the Allens Supplier Code of Conduct and declare that

_____ (name of Supplier)
meets the requirements and will comply with the commitments in the Code.

Name of authorised person _____

Position of authorised person _____

Signature of authorised person _____

Date _____

Document administration

Contact	Community Engagement
Approved by	Director of Community Engagement
Date of publication:	April 2026
Date of last review:	April 2026