



*Australia & New Zealand*

## **Supplier Code of Conduct**

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*Prepared by:* **Legal and Governance Department**  
*Authorised by:* **Tanya Myint – General Manager Legal & Governance**  
**Tim Hickman – Chief Financial Officer**

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# Supplier Code of Conduct

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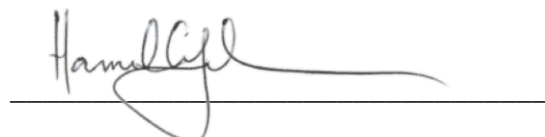
## 1 Message from our Managing Director

At Penske we operate to the highest standard of integrity and accountability and are committed to ensuring that our business and operations are safe, honest, and ethical and that all individuals are treated with equality and respect.

Our Supplier Code of Conduct guides our values and behaviours which we expect you to align with whilst doing business with us. This document sets out the requirements and expectations for you on various topics, including acting with integrity, operating safely, and respecting human rights. Please take the time to read and understand our Supplier Code of Conduct so you can comply with our requirements and expectations.

If you are ever in doubt about any aspect of the Supplier Code of Conduct, please get in touch with your Penske contact.

Thank you for your support and commitment to the values and behaviours consistent with our Supplier Code of Conduct. We look forward to working with you and growing our business relationship.



Hamish Christie-Johnston  
Managing Director  
Penske Australia and New Zealand

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## 2 Field of Application

Penske Australia and New Zealand and its related companies (“Penske” or “we”) are committed to operating honestly, with integrity and purpose. Penske’s Supplier Code of Conduct (“Code”) applies to Penske’s suppliers, contractors, subcontractors and consultants and their directors, officers, and employees. The Code sets out Penske’s expectation of your conduct and the general principles which we require you to align with.

## 3 Our Values and Behaviours

Penske has adopted a set of principles, standards and actions which we consider to be of utmost importance. These values and behaviours are referred to as **OPTIC**. In working with Penske, you must acknowledge Penske’s OPTIC values and support these values. Outlined below is an explanation of Penske’s OPTIC values.



Item 1: Penske’s OPTIC Values

## 4 Ethical Business Practices

You are expected to conduct your business in an honest and professional manner. You must ensure that your activities and those of your suppliers are conducted ethically and in compliance with applicable laws. When working with Penske, you will act with Penske’s best interest in mind and maintain an open line of communication.

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## 5 Our Expectations

### 5.1 Health and Safety

At Penske, we treat health and safety with the utmost importance and are committed to providing a safe and healthy workplace by eliminating hazards and reducing risks as low as reasonably possible.

You must comply with the applicable workplace health and safety laws. You must also be aware of and comply with Penske's health and safety standards, procedures and practices. We expect you to have a workplace culture where health and safety is at the forefront of your obligations and a health and safety management system which robustly provides the tools to achieve this.

### 5.2 Discrimination and Harassment

Penske does not tolerate unlawful discrimination, harassment (including harassment of a sexual nature), or bullying in the workplace. We expect you to have a policy in place to prohibit unlawful discrimination, harassment and bullying in your workplace and implement procedures and training within your workforce to give effect to the policy.

In working with Penske, if either party becomes aware of a situation that may involve any unlawful discrimination, harassment, or bullying through actions of our respective representatives, both parties agree to promptly work together to investigate the situation, take any reasonable preventative measures and develop a remediation strategy. You must report any unlawful discrimination, harassment, or bullying matters encountered within your interactions with Penske's representatives to your Penske business contact or if you feel uncomfortable in doing so, via our Speak Up system, details of which are outlined in section 6 of this document.

### 5.3 Human Rights and Modern Slavery

Penske supports the *UN Guiding Principles on Business and Human Rights* and requires you to similarly align to these standards.

Penske has a zero-tolerance approach to modern slavery and have implemented measures to prevent modern slavery within our operations and supply chain. We comply with applicable modern slavery laws.

You must comply with all applicable modern slavery laws and submit an annual modern slavery report if required to do so under law. If you see or suspect any modern slavery risks within your operations or supply chain, you must notify us immediately. If Penske requests information about your modern slavery safeguarding processes and procedures within your operations and supply chain, you will provide prompt and transparent cooperation and assistance which may include completion of Penske's third-party risk questionnaire or compliance with an audit.

### 5.4 Bribery

Penske acts with honesty and integrity throughout all our business practices. We comply with applicable anti-bribery and corruption laws. We require you to conduct your business and operations with honesty and never offer, provide or authorise bribes of any kind, including facilitation payments, either directly or indirectly. You must comply with all applicable anti-bribery and corruption laws.

You must ensure that any offered gifts, benefits, or hospitality are appropriate, proportionate, and in accordance with relevant laws. Where gifts or hospitality are offered, these should not be intended or interpreted as an attempt to improperly influence business decisions. If Penske requests information about your anti-bribery and corruption risk management processes and procedures, you will provide prompt and transparent cooperation and assistance which may include, but not be limited to, the completion of Penske's third-party risk questionnaire.

### 5.5 Conflicts of Interest

A conflict of interest is a situation where your role or relationship with Penske or personal interests could affect or could be perceived to affect your judgement, objectivity, or independence to effectively fulfill your responsibilities to Penske.

We expect you to act honestly, to identify and disclose any actual, potential, or perceived conflicts of interest. You must not ignore a conflict of interest but rather disclose to Penske any conflict of interest that affects your obligations to Penske as soon as possible.

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## 5.6 Environmental Responsibility

At Penske we place high value on maintaining a sustainable environment and hold AS/NZS ISO 14001 certification. You must comply with all applicable environmental laws and either hold certification or adhere to the standards contained in AS/NZS ISO 14001. We expect you to be environmentally responsible and report any actual or potential environmental incidents impacting your work with Penske to your Penske contact.

## 5.7 Climate

Penske recognises the importance of making progressive climate-related changes and creating positive environmental impacts through our operations and supply chain. We are committed to identifying opportunities for increased sustainability in our operations including implementing targets to decrease climate-related risks and reduce greenhouse gas emissions.

You are expected to align with our commitment to identifying and capitalising sustainability opportunities within your operations and supply chain. If Penske requests, you must provide, greenhouse emissions data relating to your operations (scope 1 and 2), products and supply chain (scope 3).

## 5.8 Responsible sourcing and conflict minerals

Penske supports laws and regulatory principles promoting responsible sourcing of conflict minerals and ensures our business operations are in line with applicable laws. The products you supply to Penske must be conflict-free and if we request, you must supply Penske with supporting information regarding your supply chain of conflict minerals to the level of detail reasonably required by Penske's customers.

## 5.9 Trade control and sanctions compliance

We expect you to be aware of all export control and sanctions restrictions which are applicable to your business and operations. You must comply with all applicable laws and regulations with respect to export-controlled items. You must maintain all necessary licensing and procedures to support compliance with export control laws.

You must also ensure not to contravene any applicable international and autonomous sanctions laws in your supply chain or distribution channels of your products.

## 5.10 Cyber security

Penske is dedicated to protecting our data and those of our business partners in line with industry best practice. Penske aligns its cyber security practices and compliance to that of the Australian Government Information Security, ASD Essential 8 and US-based SOX Compliance. We expect you to treat all data supplied by Penske or obtained by you from your interactions with Penske in a confidential manner and employ industry standard practices to preserve the security of such information. If you have become a victim of a cyber-attack or there has been a data breach and any Penske related information may be or has been compromised, you must notify Penske immediately and work with Penske on developing a remediation and communication strategy in relation to the incident.

## 5.11 Privacy and Confidential Information

You must comply with privacy laws and take all necessary steps to safeguard personal information and confidential information obtained from Penske. You must maintain a privacy policy which aligns to the principles as set out in Penske's Privacy Policy (via <https://penske.com.au/compliance-legal/>) and ensure that you maintain industry standard practices to mitigate against the risk of unintended disclosure of personal information and confidential information obtained from Penske.

## 6 Speak Up!

Penske has a workplace culture that encourages employees to speak up about concerns regarding actual or suspected contraventions of applicable laws and Penske's policies without fear of reprisal or retaliation. We encourage you to raise any questions or concerns relating to contraventions of this Supplier Code of

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Conduct or applicable law via telephone, online or by speaking with your direct Penske contact. If you are not comfortable with raising a concern and disclosing your identity, you may submit an anonymous disclosure using any of the methods found at <https://penske.com.au/compliance-legal/>.

## 7 Adherence to the Code

Penske is committed to working collaboratively with our suppliers, contractors, sub-contractors, agents and consultants to identify best practice improvement opportunities and drive mutually beneficial value. You must comply with all aspects of this Code. We encourage you to have policies and procedures in place to effectively implement these principles within your business. We also encourage you to support your suppliers to adopt the same principles and implement relevant systems accordingly.

Penske reserves the right to audit your compliance with the Code including carrying out onsite audits or speaking to your employees upon reasonable request.

## 8 Relevant Documents

Name	Location
Human Rights Policy	<a href="https://penske.com.au/compliance-legal/">https://penske.com.au/compliance-legal/</a>
Anti-Bribery and Corruption Policy	
Modern Slavery Statement	
Health and Safety Policy	
Australian Whistleblower Policy	
Privacy Policy	

## 9 Amendments

Please Note:

- The issue of an update invalidates the previous issue;
- The currently valid version of the policy can be accessed on the intranet;
- Hard copy printouts are not covered by any subsequent amendments;
- Always verify that the version is current before using the information contained therein.