

Purpose

MMG Limited and its subsidiaries (MMG) are committed to maintaining high standards of integrity in everything we do. This includes ensuring that MMG's suppliers align with our values and embrace a fair, sustainable, socially responsible and ethical approach to conducting business.

Application of and Compliance with the Supplier Code of Conduct

This Supplier Code of Conduct (Code), sets our minimum standards of all suppliers of goods or services to MMG, including their subsidiaries and subcontractors. We expect that our suppliers, whether directly or through their supply chain, implement suitable management systems and processes that support the implementation of this Code appropriate to their size and the nature of the goods and services they provide to MMG.

We encourage our suppliers to exceed the minimum standards set out in this Code. We expect our suppliers to communicate this Code to their related entities, employees, agents and sub-contractors so that they are aware of, understand and comply with this Code. We also expect our suppliers to promote the principles of this Code throughout their supply chain.

Minimum Standards for Suppliers

Compliance with Laws

- Comply with all local, national and other applicable laws and regulations of the jurisdictions in which the supplier operates.
- Where the local laws are weaker than the requirements of this Code, suppliers should apply the higher standards of this Code.

Human Rights

- Conduct their business in a manner that respects and supports internationally recognised human rights consistent with the Universal Declaration of Human Rights and the International Labor Organisation's Declaration on Fundamental Principles and Rights at Work.
- Actively work to implement the UN Guiding Principles on Business and Human Rights.

Forced Labour and Inhumane Treatment of Workers

- Ensure work is freely chosen and workers can leave their employment after reasonable notice.
- Not engage in and prohibit suppliers from engaging in the use of forced, bonded, compulsory labour, slavery or human trafficking, the use or threat of physical or other punishment, or the physical, sexual or psychological abuse or inhumane treatment of workers.
- Not require workers to pay recruitment fees in connection with their employment (including to third party agents) or withhold workers' original identity documents.

Child Labour

- Not engage in child labour and take appropriate steps to verify the age of workers.

- Comply with international and local obligations relating to the appropriate employment of young workers, including adhering to the minimum legal working age in their jurisdiction or with the standards set by the International Labour Organisation, whichever is higher.
- Ensure workers under the age of 18 are not employed in hazardous work or in work incompatible with their development.

Wages, Benefits and Working Hours

- Comply with applicable laws and regulations relating to remuneration and benefits, including minimum wages, overtime, superannuation, leave entitlements and other benefits, and ensure the timely payment of workers.
- Provide workers with clear and understandable information in writing about all relevant employment conditions before they enter employment.
- Ensure working hours do not exceed the maximum hours required by applicable laws and regulations.

Freedom of Association

- Respect workers' rights, in accordance with applicable laws, to freedom of association, to establish and join or not join workers' associations, to bargain collectively, and to engage in lawful industrial activity, without interference, intimidation or harassment or retaliation against workers or any workers' representatives.

Anti-discrimination and Harassment, Diversity and Inclusion

- Not engage in or tolerate direct and indirect discrimination based on gender, age, race, ethnicity, religion, marital status, sexual orientation, gender identity, pregnancy, disability, union membership or political affiliation, or any other status protected by applicable laws.
- Provide and support a workplace free from bullying, harassment, victimisation and abuse, whether physical, sexual, verbal or psychological.
- Demonstrate a commitment to a diverse, inclusive and respectful workplace culture and in recruitment and ongoing employment practices (including by fostering gender equality and greater cultural and minority diversity in the workplace and leadership positions).

Privacy

- Respect the privacy of workers and comply with all laws in the collection, use and protection of personal information.

Health and Safety

- Comply with applicable workplace and product health and safety laws and respect workers' rights to refuse to perform work that is unsafe.
- Provide a safe and hygienic environment for workers and third parties (including any accommodation provided to workers), by identifying and managing risks, providing safe and appropriate equipment, training and resources, and ensuring access to facilities and amenities.
- Develop, implement and maintain an Emergency Management Plan to identify potential emergencies, ensure emergency preparedness and response planning to safeguard people and assets.

Communities

- Respect the human rights of members of communities in which the supplier operates and in our host communities, including meaningful engagement with vulnerable, marginalised and at-risk groups.

Security

- Where suppliers provide security services to MMG or where suppliers have their own security arrangements, adhere to the Voluntary Principles on Security and Human Rights.

Environmental Compliance

- Comply with applicable environmental laws, regulations and standards and obtain, maintain and comply with necessary permits or approvals.
- Actively manage the environmental impact of their operations, including by maximising the efficient use of energy, water and resources, minimising waste, and reducing the risk of pollution, deforestation, loss of biodiversity and greenhouse gas emissions.
- Measure and disclose, on request, greenhouse gas emissions data to MMG.

Responsible Sourcing of Minerals

- Where suppliers supply minerals to MMG they must comply with MMG's Responsible Mineral Production and Sourcing Policy and conduct due diligence aimed at ensuring they do not profit from, contribute to, assist with or facilitate the commission by any party, human rights abuses or conflict.
- Due diligence must be aligned with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and the suppliers' position in the supply chain.

Ethical Business Practices

- Act and conduct their business in a fair, ethical, transparent and professional manner.
- Not engage in fraud, bribery or corrupt conduct, and comply with applicable anti-bribery, anti-corruption and anti-money laundering laws and regulations.
- Not offer or receive improper gifts or other benefits, including facilitation payments, that may affect the outcome of business dealings or are not otherwise reasonable and justified.

- Not engage in or tolerate association with any criminal organisations or illegal activity.
- Comply with international and applicable local laws and regulations relating to sanctions, export or import and trade controls.
- Maintain accurate records in relation to financial transactions, safety, personnel, quality, social and environmental performance.
- Not disclose or release any MMG proprietary information to any third party, particularly where that information may provide an actual or perceived competitive advantage or market knowledge subject to contractual obligations and entitlements.
- Not publicly disclose their supply association with MMG or use the MMG name or brand elements without the prior written consent of MMG subject to contractual obligations and entitlements.

Grievances

- Provide workers, agents, subcontractors, suppliers and other potentially affected stakeholders with access to a confidential grievance mechanism to ensure grievances can be submitted and addressed without fear of retaliation.

Training

- Provide workers with appropriate training to perform their duties and to comply with this Code.

Monitoring Compliance and Improvement

MMG requires that our suppliers, including their subsidiaries and subcontractors, monitor their compliance with this Code, and advise us of any non-compliance. Suppliers must take all reasonable steps to promptly address, remedy and prevent any non-compliances.

We may review our suppliers' compliance with this Code and require our suppliers to co-operate and provide any information as we may reasonably require to perform such a review.

We focus on building our suppliers' understanding so they can implement the most suitable and effective measures independently. If a Supplier is unable or unwilling to meet our minimum standards, we reserve the right to end the relationship at our discretion subject to contractual obligations.

We are committed to supporting our suppliers in their endeavours to raising their performance in relation to environmental and social matters and associated risk management.

Raising a Concern

MMG's suppliers and their employees can raise concerns about any actual or suspected breach of this Code through any of the contact points provided for in their agreements with MMG or through the MMG Whistleblower Service. The Whistleblower Service is an independent, confidential service for reporting unacceptable conduct in the workplace. The Whistleblower Service is managed by an external company that suppliers can contact anonymously (if they choose).

Whistleblower Contact Details

Email mmgwhistleblower@deloitte.com.au

Online mmg.deloitte.com.au

Mail MMG Whistleblower Service
Reply Paid 12628
A'Beckett Street
Melbourne VIC 8006
AUSTRALIA

Additional Resources

- International Council on Mining and Metals' Mining Principles
- International Labour Organisation's Declaration on Fundamental Principles and Rights at Work
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
- MMG Code of Conduct
- MMG Human Rights Policy
- MMG Responsible Mineral Production and Sourcing Policy
- MMG Whistleblower Framework
- United Nations Guiding Principles on Business and Human Rights
- United Nations Sustainable Development Goals
- Universal Declaration of Human Rights
- Voluntary Principles on Security and Human Rights