

RPMGlobal Holdings Limited

ACN 010 672 321

Supplier Code of Conduct

Adopted by the Board on 9 July 2019

Last reviewed by the Board on 25 August 2023



Table of Contents

- 1. Our Philosophy.....3
- 2. Application of this Code.....3
- 3. Ensuring Compliance with the Law3
- 4. Anti-Bribery and Corruption.....4
- 5. Acting Professionally and Ethically.....4
- 6. Respecting Labour and Human Rights.....4
- 7. Review5

1. Our Philosophy

RPMGlobal Holdings Limited and its related subsidiaries and group companies (together '**RPM**' and the '**Company**') are committed to its values of courage, excellence, shared learnings, teamwork and respect. RPM holds itself accountable to the highest standards of ethical conduct and aims to act honestly and with integrity in all of its dealings.

2. Application of this Code

This Supplier Code of Conduct (the '**Code**') establishes the minimum standard of behaviour that is expected of any suppliers, contractors, subcontractors, partners and any other third parties that deal with RPM (collectively referred to as '**Suppliers**' in this Code).

While all Suppliers are required to comply with this Code, it is important to recognise that it is not a legally binding document and will not form part of any contractual agreement between RPM and its Suppliers.

In addition to complying with the standards in this Code, while on any RPM premises, Suppliers must comply with RPM policies and procedures, as well as standards which may be more fully defined in their contract with RPM. Publicly listed in Australia, RPM requires compliance with various reporting standards; Suppliers must be aware of and support RPM's reporting, as applicable, and must be transparent with the services they provide to RPM.

Suppliers, including their officers, management, and personnel, are expected to report suspected violations of RPM's Code and any other RPM policies by any Supplier or RPM personnel. Suppliers can report violations directly to a RPM representative or in accordance with RPM's Whistleblower Policy.

Suppliers are expected to have an internal process whereby complaints can be raised and investigations undertaken for violations of this Code. When complaints relating to this Code are raised, Suppliers must promptly investigate.

All new Suppliers will be required to confirm that they have read and understood this Code as they are onboarded. RPM will periodically review Suppliers' conformance with these standards. Upon request Suppliers will be required to reaffirm their understanding and agreement to comply with this Code.

Failure to adhere to this Code may be grounds for termination of the Supplier relationship and any related agreements.

3. Ensuring Compliance with the Law

RPM complies fully with the content and spirit of all laws, legislation and regulations which govern the Company and its operations, business environment and employment practices. Suppliers must adhere to the same compliance standard as RPM in that they conduct themselves, their business operations, relationships, practices and sourcing in a lawful and ethical manner.

4. Anti-Bribery and Corruption

RPM acknowledges the serious civil and penalties that may be incurred and the reputational damage that may be inflicted on the company if it engages in fraudulent, corrupt or collusive activities. Suppliers must comply with all applicable anti-bribery and anti-corruption laws and should have adequate policies and procedures in place to ensure complete compliance with such laws.

Suppliers must ensure that they do not commit, or become involved, whether directly or indirectly, in the giving or receiving of bribes, pay-offs or facilitation payments (i.e. customary, unofficial minor payments to secure or speed up a transaction or process), and secret commissions to public officials or private entities, whether in the form of gifts or money. This requirement applies even if it is legal or common practice in a country.

Suppliers should have an internal complaints procedure (such as a Whistleblower policy) to allow its employees and workers to report violations and misconduct without fear of retaliation.

5. Acting Professionally and Ethically

RPM conducts itself in a professional and ethical manner according to applicable industry standards and expects Suppliers to do the same. Suppliers are expected to conduct their business practices to a high standard of professionalism, care and diligence and must not act in a way that will bring RPM's reputation to disrepute such as by breaching its confidentiality and privacy obligations.

Suppliers are expected to acknowledge and respect the Intellectual Property Rights of RPM and that of other third parties. Suppliers must not, directly or indirectly, be a party to any conduct that may infringe RPM's Intellectual Property Rights such as to make, distribute, obtain or use any unlicensed or copyrighted software or information without proper authorisation.

6. Respecting Labour and Human Rights

RPM is committed to protecting and advancing human dignity and human rights by managing the risk of Modern Slavery throughout its supply chain, domestic and international business practices and all other related business relationships. RPM is aware of its obligations under the *Modern Slavery Act 2018* (Cth) and *Modern Slavery Act 2018* (NSW) and is committed to reducing the risk of modern slavery occurring within its organisation, infiltrating its supply chain or through any other business relationships. RPM acknowledges that conduct such as discrimination, workplace bullying, forced labour, human trafficking and debt bondage are serious violations of one's human rights.

Suppliers are required to commit to the same risk management processes in relation to Modern Slavery as RPM. Suppliers are required to declare in a timely manner to RPM any known risks that may exist in the supply chain, business practices or other business related relationships that may contribute to Modern Slavery.

A Supplier must ensure that:

- a) It does not engage in any form of child labour by meeting all minimum working age requirements pursuant to applicable laws and regulations;
- b) It is not involved in forced, bonded or involuntary labour;
- c) It adopts an open attitude towards employee and worker's right to freedom of association;
- d) Wages and benefits paid to workers and employees for a standard working week must satisfy the applicable living wage requirements as required by the applicable laws or regulations;
- e) It has not engaged in discriminatory employment practices that discriminates based on a person's cultural, ethnic, religious, gender or other diversity factors;
- f) It complies with the applicable workplace health and safety laws and regulations; and
- g) It maintains a workplace environment that treats all employees and workers with dignity and respect.

7. Review

The Board is responsible for reviewing this policy annually to ensure that it remains up-to-date and in the best interests of the Company. This policy may be amended by resolution of the Board and was last reviewed by the Board on 25 August 2023.