

1. Policy Statement

The purpose of this Policy is to ensure that all contractors engaged by Adelaide Airport Limited (AAL); Parafield Airport Limited (PAL) or their successors or assignees (together referred to as 'AAL') are made aware of their obligation to meet AAL's expectations of responsible behaviour to their subcontractors and employees.

All contractors of AAL are expected to comply with current best practice as a condition of their engagement, and must conduct themselves legally, ethically and with integrity in line with AAL's standards as set out in this policy.

A material breach of this Policy by a contractor or repetitive minor breaches will constitute a breach and default by the contractor of its contractual arrangements with AAL and will entitle AAL to exercise its legal rights arising on default.

This Policy does not override any of the terms and conditions of the primary contract. In the event of inconsistency, the terms of the primary contract are paramount.

2. Policy Objectives

The objective of this Policy is for all contractors of AAL to be committed to:

- acting in a socially responsible way;
- continually improving performance and complying with all relevant legislation; and
- encouraging staff and subcontractors to be mindful of the effect of their actions on any natural resource.

3. Policy Elements

AAL requires that contractors engaged by AAL shall comply with the Supplier Code of Conduct, Whistleblowing Standards, Human Rights, Equality and Diversity Standards and Standards of Ethics and Ethical trading set out below.

Supplier Code of Conduct

- Engage ethically, transparently and with a high level of respect with their employees and subcontractors.
- Comply with all workplace, safety, health and other laws relevant to employment conditions.
- Demonstrate a positive workplace culture, including by upholding any employee (and any subcontractor) rights, conditions and wellbeing.
- Promote diversity and equality of opportunity.
- Take proactive steps to eliminate discrimination of any kind and promote equality of opportunity in the supply chain.
- In the event of a loss of contract with AAL, ensure that all employees rights are upheld and all benefits are paid or transferred to the appropriate legal person or successor.

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- If a construction contractor, meet the standards of the Code of Practice for the South Australian Construction Industry.
- Operate in a way that safeguards against unfair business practices.
- Adopt a proactive approach to developing relationships between employees, subcontractors, and communities.
- All subcontracts must clearly set out the agreed terms, conditions and the basis for the relationship.
- Share and declare information regarding actual or potential personal and corporate conflicts of interest and seek guidance from higher authority before acting.
- Commit to ensuring that all business is conducted in all respects according to rigorous ethical, professional and legal standards.
- All the laws that regulate and apply to the contractor must be complied with.
- Ensure that stakeholders have confidence in the decision-making and management processes of the procurement of subcontractors.
- All groups and individuals with whom the contractor has a business relationship will be treated in a fair, open and respectful manner.
- The contractor will seek feedback on performance, and AAL will continually review all activities to ensure best practice is observed at all times.
- Allow customers, employees and vendors to give feedback on the contractor's performance and Contractor to ensure that all comments are analysed, responded to and where appropriate, acted upon.

Whistleblower Standards

- Foster a culture of reporting misconduct and manage reports of such in accordance with relevant laws.
- Contractors, their employees and subcontractors are entitled to report misconduct, which includes relating to AAL, in accordance with the AAL Whistleblower Policy and where such report is made, will be afforded the relevant protections set out in this Policy. This policy and information regarding the reporting mechanisms are available from AAL on request.

Human Rights, Equality and Diversity Standards

- Support and respect the protection of internationally proclaimed human rights and observe international human rights standards within their work.
- Ensure that customers, employees and vendors are able to work together in confidence and be treated with respect by each party.

Ethics and Ethical Trading Standards

- Ensure clear visibility through supply chains, so the Contractor is aware where all products are made and under what standards, with a specific focus on preventing instances of modern slavery within supply chains.
- Training to be provided to relevant people on environmental and social issues affecting supply chains.
- Ensure that vendors uphold the workplace standards and behaviours consistent with the Company's requirements.

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4. Related Policies and Procedures

- AAL Whistleblower Policy

5. References

- Not Applicable

6. Terms and Definitions

- **Code of Practice for the South Australian Construction Industry** means the code published from time to time by the South Australian Department of Planning, Transport and Infrastructure, and at the date of this document dated March 2016 and available from (https://www.dpti.sa.gov.au/_data/assets/pdf_file/0006/255561/08_code_of_practice_and_implementation_guidelines_2016_po22_v1.2.pdf)

7. Managing Director Sign-off

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Mark Young
Managing Director

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