



Supplier Code of Conduct

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December 2023

1. Introduction

G8 Education Limited (G8) is one of Australia's largest providers of quality early childhood education and care. Regardless of the brand or locality, we're united by our purpose, creating the foundations for learning for life.

As an organisation, we fulfil our purpose in accordance with the highest standards of ethics and conduct by:

- Complying with all relevant laws and regulations;
- Empathising with the needs of others;
- Treating people fairly;
- Being true to our word and standing behind our promises;
- Communicating openly and with candour;
- Respecting privacy and confidentiality; and
- Understanding the needs and importance of our shareholders, community, team members, families and partners.

This Supplier Code of Conduct (**Code**) makes clear the behaviours that G8 will demonstrate and clarifies our expectations of our Suppliers in relation to Environmental, Social and Governance (**ESG**) related issues.

2. Our Commitment

At G8, we strive to demonstrate the highest standards of business ethics and are committed to managing our Supplier relationships in an ethical, transparent and responsible manner. G8 cares about how our Suppliers manage their operations and supplier relationships and expects that the people and communities along our supply chain are not adversely impacted by our Suppliers' actions and decisions. For every expectation we have of our Suppliers, in this document we also set out G8's commitments. G8 will review this Code regularly to ensure it continues to reflect stakeholder expectations and legislative requirements.

3. Definitions

Unless the contrary intention is expressed in this Code, the following words (when used in this Code) have the meaning set out below:

- **“Suppliers”** means all businesses that are involved in the supply of goods or services to G8.
- **“G8”** means G8 Education Limited including its subsidiaries, as referenced on G8’s website.
- **“Workers”** means all employees, including permanent, part-time, contract and temporary workers engaged by Suppliers, and their supply chain and sub-contractors.⁴

4. Minimum Requirements

As a condition of doing business with G8, we expect all Suppliers to operate in a manner that meets or exceeds our Minimum Requirements and to be able to demonstrate suitable measures are in place to meet our Minimum Requirements.

Suppliers must:

- Comply with all relevant laws and regulations;
- Comply with G8’s Environment, Sustainability and Governance expectations as set out in this Code;
- Respond to reasonable requests for information from G8 in a timely manner, including but not limited to questionnaires, interviews, site visits, audits and corrective action plans;
- Provide a true and accurate account of their operations and supply chain when responding to requests for information from G8;
- Promptly advise G8 of any non-compliance with this Code;
- Have processes in place that allow for workers to report non-compliance with this Code, anonymously and free of retribution or other unfavourable treatment;
- Remedy any non-compliance with this Code as a matter of highest priority;

(together, the **“Minimum Requirements”**).

5. Our approach

G8's Minimum Requirements are informed by applicable laws, international and industry standards, G8's business needs, and our stakeholders' expectations.

Our approach at G8 is to assess Suppliers' compliance with this Code on an ongoing basis, to drive continuous improvement for G8 and people and communities along our supply chain. G8 will consider a Supplier's performance in accordance with this Code when making sourcing decisions and in managing our relationships with Suppliers.

If a Supplier is unable to demonstrate compliance with the Code or fails to meet Minimum Requirements, G8 reserves the right to pursue appropriate action, including remediation or termination of the business relationship with the Supplier.

6. Environmental Expectations

At G8, we care for our environment and are committed to a sustainable future.

We expect our Suppliers to:

- Comply with relevant environmental protection laws, regulations and standards.
- Establish programs that seek to reduce the environmental impact of their operations and supply chain.
- Promptly report any significant non-compliance with environmental protection laws to G8.
- At G8's reasonable request, provide G8 with information to enable G8 to comply with environmental reporting obligations (for example, in relation to emissions, waste, or water).

7. Social Expectations

7.1 Human Rights

We respect human rights and are committed to preventing all forms of modern slavery, child labour and human trafficking in our supply chain.

We expect our Suppliers to:

- Manage their operations and supply chain in a manner that upholds the United Nations' (UN) Universal Declaration of Human Rights, UN Guiding Principles on Business and Human Rights and the International Labour Organisation's (ILO) Core Conventions.

- Address any adverse impacts on human rights and/or working conditions, arising from decisions made by the Supplier, as a matter of urgency.
- Implement and maintain reasonable controls to ensure their operations operate in line with G8's Minimum Requirements and Social Expectations and take reasonable steps to address any risks in relation to same in their supply chain.

7.2 Modern Slavery

Suppliers must not use modern slavery practices in their operations or supply chain.

Modern slavery means any activity, practice or conduct that would constitute an offence in relation to slavery, forced labour, involuntary servitude, debt bondage, human trafficking, forced or servile marriage, the sale and exploitation of children and other slavery-like exploitation as prohibited or defined as a modern slavery offence applicable Law from time to time in force, or deceptively recruiting workers for labour or services.

Workers must not be required to submit deposits or government-issued identity documents (such as passports) to be held as a condition of employment. Suppliers must actively support the abolition of modern slavery by taking reasonable measures to identify and mitigate modern slavery risks in their supply chain.

7.3 Child Labour

Suppliers must not employ children below the minimum legal working age where the work is undertaken. Suppliers must not use children in modern slavery practices. Suppliers must not require children to engage in hazardous work which may cause harm to their health, safety or morals.

7.4 Worker Entitlements

Suppliers must provide workers with entitlements in compliance with relevant labour laws and applicable industrial instruments in the country where the work is undertaken. Suppliers must ensure that workers are correctly engaged and classified as either employees or independent contractors and treated as such, and that all legal obligations due to the worker are satisfied.

7.5 Sub-contractors

Suppliers must keep a register of subcontractors. This register must be made available to G8 on G8's request.

7.6 Freedom of Association

Suppliers must ensure that workers' rights to freedom of association and collective bargaining are respected, and that workers have the right to form and join trade unions, in accordance with local laws in the country where the work is undertaken.

7.7 Inhumane Treatment

Suppliers must ensure that workers are not subjected to corporal punishment, physical abuse or discipline, verbal or mental abuse, sexual abuse or any type of exploitation.

7.8. Discrimination, Harassment and Bullying

At G8, we are committed to providing a workplace free from discrimination, harassment and bullying.

We expect our Suppliers to:

- Comply with workplace laws in respect of discrimination, harassment and bullying in their operations and take reasonable steps to address any risks in relation to same in their supply chain.
- Have and uphold reasonable standards of behaviour in the workplace which apply to all workers.
- Ensure work environments are inclusive and recruitment and employment practices are free from direct or indirect discrimination based on age, religion, culture, ethnicity, gender, sexual orientation, marital status, family responsibilities, disability or health status of workers, in accordance with law.

7.9. Safety Culture

At G8, we are committed to providing a healthy and safe workplace that strives for a proactive safety culture.

We expect our Suppliers to:

- Comply with relevant laws in respect of Work Health and Safety in their operations and take reasonable steps to address any risks in relation to same in their supply chain.
- Ensure that work environments, plant, equipment and accommodation, where applicable, are safe and hygienic.
- Have processes in place to prevent and minimise health and safety risks.
- Inform G8 immediately of any workplace deaths due to poor workplace practices and provide details of workplace incidents, at G8's request.

7.10. Diversity

G8 promotes and seeks diversity across its supply base.

We expect our Suppliers to:

- Promote and increase supplier diversity within their organisation and take reasonable steps to promote and increase same in their supply chain by seeking equitable, mutually beneficial opportunities with a broad range of businesses, for example: small and medium-sized enterprises (SMEs), social enterprises, women owned businesses, businesses that support and employ people with disabilities, LGBTIQ+ owned businesses and Indigenous businesses.

8.

Governance Expectations

8.1. Risk Management

At G8, we work with our stakeholders, team members, Suppliers and communities to better understand how to manage and reduce risk and to build resilience.

We expect our Suppliers to:

- Demonstrate appropriate risk management and governance to ensure compliance with applicable laws and accounting practices.
- Ensure recovery and continuity of services to G8 arising from a disruption to their services, where appropriate.
- Protect G8 data from loss, misuse or damage, including but not limited to, sensitive data and G8 customer data and notify G8 immediately if they become aware of any such loss, misuse or damage.
- Notify G8 immediately if they become aware of any association with politically exposed persons.
- Maintain appropriate certifications including insurance, regulatory and industry certifications to meet their obligations to G8 under this Code and any relevant agreements.

8.2. Fraud, Bribery and Corruption

At G8, we do not tolerate behaviour that is dishonest, illegal, fraudulent, corrupt or unethical.

We expect our Suppliers to:

- Employ reasonable measures and controls to ensure that their workers and Suppliers do not commit fraud, bribery or corruption, or become involved in such activities.
- Keep accurate records and ensure that information provided to G8 is a true and accurate reflection of their operations, supply chain and business dealings.

8.3. Ethics & Conduct

At G8, we fulfil our purpose in accordance with the highest standards of ethics and conduct.

We expect our Suppliers to:

- Ensure that they do not source goods or services on behalf of G8 from any country, entity or persons subject to internationally recognised trade sanctions.
- Disclose any actual, potential or perceived conflicts of interest in respect of their dealings with G8.
- Avoid offering or receiving gifts, entertainment or travel that could affect, or be seen to affect, their dealings with G8.

- Pay their workers, suppliers and subcontractors fairly and on time, in accordance with applicable laws and agreements.

8.4. Social Media

At G8, we are committed to using social media platforms responsibly and being courteous and respectful of others.

We expect our Suppliers to:

- Refrain from disrespectful, unprofessional, harassing, defamatory, discriminatory and prohibited activity on social media platforms.
- Not act or speak on behalf of G8, represent themselves as G8, or express any views attributable to G8 unless expressly authorised to do so by G8.
- Not use G8's brands or logos, except as expressly permitted by G8 in writing.

9. Questions

Our Code cannot set out every situation our Suppliers may encounter. In these instances, we encourage Suppliers to contact us to openly discuss the issue. Any questions or feedback regarding this Code should be referred to your G8 business contact in the first instance. For more information about G8's codes and policies, please reference G8's website.

10. Reportable Conduct

Should our Suppliers and people working along our supply chain become aware of G8 misconduct, or improper state of affairs or circumstances, such as illegality or fraud, they can report it anonymously by calling 0402 209 109 or by emailing whistleblower@g8education.edu.au.

** Unless otherwise indicated, this policy will still apply beyond the review date.*