



Supplier Code of Conduct

Overview

Pacific National's Vision is to be Australia's most trusted and respected logistics partner. We deliver what matters – for our people, customers, and shareholders, and we care more.

We believe the key to realising our Vision lies in consistently demonstrating honesty, integrity, and respect, while prioritising ethical and responsible decision-making in all aspects of our business operations.

This includes when working with any individual or company who provides goods or services to Pacific National (our **Suppliers**). Our Suppliers are integral to our operations and our ability to deliver our best every day.

As such, we expect any Supplier providing goods or services to Pacific National to meet the minimum standards of behaviour set out in our Supplier Code of Conduct (the **Supplier Code**).

This Supplier Code applies to all our Suppliers whenever they are conducting business with Pacific National. It is aligned with our company Code of Conduct and our Pacific National Approach (**PNA**) and reflects the expectations of our people, customers, investors, regulators, and the community.

Our Commitment

At Pacific National, we are committed to:

- Safety above all else
- Embracing inclusivity
- Compliance with laws and regulations
- Honesty and integrity
- Protecting our people, assets, and reputation
- Operating sustainably
- Speaking up

As such, the Supplier Code reflects the behavioural and ethical expectations for how we require you to engage with us, our customers, and the community in which we operate. We are also committed to working closely with Pacific National's Suppliers to ensure they comply with this Supplier Code and the standards set out below.

Our Approach

This Supplier Code is important to how we manage the relationship between our Suppliers and Pacific National. We will not tolerate breaches of the Supplier Code, or any form of victimisation, reprisals or adverse treatment against Suppliers or their employees if they raise an issue or complaint in relation to this Supplier Code.

1. What it means for you

All Pacific National's Suppliers are expected to use the Supplier Code to help them understand what is expected when working with Pacific National.

Suppliers are expected to read, understand, and comply with the Supplier Code and any policies, procedures, and guidelines relevant to the work you undertake with Pacific National, and which Pacific National has provided to you.

The Supplier Code is not all encompassing and does not deal with every situation which may arise. It outlines the minimum standards expected, and specific requirements for your engagement will be included in the terms and conditions of your engagement as a Supplier to Pacific National.

Failure to act in accordance with the Supplier Code, or our relevant policies and procedures forming part of your terms of engagement, may result in immediate action including termination of any contract for goods or services.

We expect Suppliers to take positive and appropriate action to report matters, and raise concerns in connection with our workplace, operations, or sites when they become aware of issues.

At Pacific National, we recognise and value our strategic partners and Suppliers who enable us to deliver what matters – and through the shared behaviours and expectations set out below, we strive to strengthen these partnerships.

2. Safety above all else

At Pacific National, Safety is at the heart of our Values. We are committed to the safety of everyone we work with.

Our Suppliers will be committed to working safely so everyone can go home safely every day. To achieve this, we expect our Suppliers to:

- comply with the rules and policies we communicate to you for our sites, and our health and safety policies and procedures.
- prepare and hold any necessary health, safety, and environment documentation and management plans to validate and ensure compliant standards.
- take a proactive approach to removing hazards, managing critical risks, and embedding critical controls in the work you do for Pacific National.
- register and maintain compliance on Pacific National's E-Systems prior to coming on to any site.

3. Embracing inclusivity

Pacific National is committed to a diverse and inclusive culture, recognising that every person has a role to play in our success.

Suppliers to Pacific National will be committed to:

- actively supporting and encouraging diverse workforces and inclusive workplaces.
- treating all people fairly, respectfully, courteously and with dignity.
- Behaving in a way that reflects our sustainable contributions to the communities in which we operate, in particular respecting the cultural heritage and traditions of First Nations Peoples.

4. Compliance with laws

Compliance is an important part of managing risk in Pacific National's business and in meeting the expectations of the community, our customers, shareholders, and regulators.

We expect everyone who engages with Pacific National to comply with all laws and regulations as they apply to our business, including health and safety, workers compensation, employment, discrimination and harassment, privacy, modern slavery, taxation, whistleblower, competition and consumer and environmental laws.

Suppliers will be committed to:

- familiarising themselves with all relevant laws, regulations, policies, and procedures relating to their area of work and keep up to date with any changes to these.
- ensuring that the businesses within their supply chain are not engaged in, or complicit with, human rights abuses, such as forced or child labour or any other form of modern slavery, and that they apply policies and systems in their operations to ensure the materials incorporated into their goods comply with all relevant laws including in relation to modern slavery.
- fair wages and benefits for their employees and contractors, in compliance with employment laws.
- a safe workplace that promotes health and wellbeing and is free from discrimination, harassment, vilification, abuse and bullying.
- encouraging and enabling reports of inappropriate behaviour in the workplace and suspected violations of laws.

5. Honesty and integrity

Pacific National is committed to consistently demonstrating honesty, integrity, and respect, while prioritising ethical and responsible decision-making in all aspects of our business operations.

Pacific National's Suppliers will be committed to:

- acting ethically and in a manner that will not result in a violation of the principles described in the OECD Convention on Combating Bribery of Foreign Officials in International Business Transactions, or any applicable laws in respect of bribery or corruption.
- taking reasonable steps to avoid any conflict of interest between your interests and our interests, and notifying Pacific National if any such conflicts arise.
- acting ethically, fairly, and in a professional manner in all dealings with Pacific National.
- avoiding situations that could lead to an unfair or improper advantage or adversely affect Pacific National's brand or reputation.
- only providing or receiving entertainment benefits or gifts that are lawful and never in circumstances where those gifts or benefits could, or could be perceived to, affect impartiality or how decisions are made, or engagements performed.

6. Protecting our people, assets, and reputation

At Pacific National, assets are to be used responsibly and appropriately, whether this is property, time, information, corporate opportunities, funds, or equipment. We do not use company assets or our engagement to gain personal advantage.

Suppliers to Pacific National will be committed to:

- safeguarding and appropriately using Pacific National's assets (both physical and non-physical).
- preventing non-authorised persons from accessing Pacific National's facilities, data, or equipment and to protect assets from waste, damage, or misuse.
- not engaging in misleading or deceptive conduct, or withhold any information from Pacific National relevant to the work being undertaken or goods supplied.
- not exposing or sharing confidential or commercially sensitive information, and only making authorised public statements.

7. Operating sustainably

At Pacific National, we recognise the important role we play in the industry, to both lead and behave in a way that reflects our sustainable, economic, social, and environmental contributions to the communities in which we operate.

Our Suppliers will be committed to:

- familiarising themselves with all applicable Pacific National policies and procedures targeted at enhancing and caring for the communities we operate in and through.
- register and maintain information on Pacific National's E-Systems to support reporting on Pacific National's carbon footprint and to foster mitigating emissions from our operations and supply chain, and our overall environmental and social impact.
- protecting the environment and putting in place essential safeguards and measures to mitigate any environmental impacts from the day-to-day activities of our business.

8. Speaking up

Suppliers to Pacific National are expected to raise concerns in connection with our workplaces, business operations and stakeholder relationships. There are several ways you can report concerns about conduct to Pacific National including by:

- emailing procurement_pn@pacificnational.com.au
- for suspected breaches of the law or if you would like to remain anonymous, contacting our external service, STOPline:
 - by telephone (no caller ID) 1300 304 550
 - by email pacificnational@stopline.com.au
 - by mail: Pacific National Pty Ltd, c/o STOPline, Locked Bag 8, Hawthorn, VIC 3122

Ongoing Review

Pacific National is committed to work closely with its Suppliers to ensure they comply with this Supplier Code. We conduct assessments periodically into Supplier's practices to ensure ongoing compliance and understanding for our behavioural and ethical expectations for how you should engage with us, our customers, and the community in which we operate.

We will review this Supplier Code every two years to ensure it meets our stakeholders' expectations and legal requirements. Our Suppliers will be provided with any updates to this Supplier Code if our expectations change.

If you have any questions on the Supplier Code, please contact procurement_pn@pacificnational.com.au.

Policy Details

INFORMATION	
Policy Category	Corporate and Governance
Approval Date	May 2024
Review Date	May 2026
Policy Owner	Head of Strategic Sourcing and Capital Projects
Approving authority	Executive Leadership Team

RELATED DOUCCMENTS	
Legislation	All laws relevant to terms of engagement
Policy	Whistleblower Policy
Procedure	
Supporting Documents	Relevant terms of engagement