

SUPPLIER CODE OF CONDUCT



Ceasefire upholds the highest standards of ethical conduct, integrity, social responsibility, and environmental sustainability. We expect all our suppliers to adhere to these principles as well.

Purpose

Ceasefires reputation and success hinge on the commitment our suppliers make to understand and uphold ceasefires values, and to conduct themselves ethically in all business interactions. As a supplier, you are expected to embrace and adhere to the standards of business conduct detailed in the Supplier Code of Conduct (the Code) each day. Your support in upholding these standards is instrumental in contributing to Ceasefires continued success. We collaborate closely with our suppliers in building our projects, valuing our relationships and emphasizing effective teamwork. We are dedicated to upholding the highest levels of legal, ethical, and moral standards, with a strong focus on business ethics and Corporate Social Responsibility (CSR).

By integrating Environmental, Social, and Governance (ESG) principles into our procurement processes and policies, we ensure that our partnerships with suppliers are aligned with our core principles.

Application

Ceasefire aims to collaborate with its suppliers to surpass minimum expectations and mandatory requirements, consistently striving to elevate our business practices. We anticipate that all our suppliers will uphold rigorous standards encompassing safe working conditions, equitable and respectful treatment of employees, and ethical business conduct.

For Ceasefire, a supplier denotes any entity that provides goods or services, directly or indirectly, including construction works and services. When this Code mentions workers, it encompasses employees, subcontractors, agency staff, and temporary staff of the supplier and its affiliated entities.

Compliance with Expectations

All suppliers must familiarise themselves with and adhere to the Code, ensuring consistent adherence across their operations. It is expected that suppliers will take reasonable measures to ensure that their workers, suppliers, or other third parties in their supply chain also comply with the Code.

Maintaining high standards of ethical conduct and adherence to laws and regulations is crucial for safeguarding our business reputation. By acting ethically, complying with legal and industry standards, and striving to implement best practices in our field, we position ourselves for sustainable long-term success.

Suppliers' demonstrated commitment to the standards outlined in the Code will be evaluated when assessing suitability and feasibility during tender interviews.

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Audit, Risk Assessment and Reporting

Ceasefire conducts thorough due diligence before engaging suppliers. The demonstrated commitment to the standards outlined in the Code will be assessed during tender interviews to determine suitability and feasibility. We expect suppliers to uphold the same level of due diligence in accordance with the Code.

Suppliers are responsible for self-assessing their compliance with this Code and promptly addressing any deficiencies or breaches identified through audits, risk assessments, or reviews. Suppliers are encouraged to raise concerns, seek clarification as needed, and cooperate with requests for evidence and confirmation of their compliance with the Code.

Furthermore, when Ceasefire and its suppliers collaborate on an NSW Government project, they are obligated to adopt, at a minimum, the expectations and behaviours detailed in the NSW Government Supplier Code of Conduct.

Suppliers must adhere to the terms of the Contract Agreement, even if they are more stringent than the expectations outlined in this Code.

Enforcement

We are committed to partnering closely with suppliers to enhance their capacity and capabilities in meeting the requirements of the Code. This may involve offering guidance, resources, and support as needed to help suppliers achieve these expectations. Together with suppliers, we will develop actionable plans to address identified concerns and enhance compliance.

In cases of significant nonconformity, Ceasefire reserves the right to issue time-bound rectification notices for non-compliance with the Code. Failure to rectify such issues may result in termination of the supplier relationship.

Corporate Governance

Sound management of administration, risk, and corrective action systems is essential for maintaining a dependable supply chain. Suppliers are required to uphold robust administration processes. We actively encourage suppliers to continuously evaluate and enhance their practices in accordance with the Code.

We expect our suppliers to adhere to all relevant laws, regulations, and standards within NSW and Australia, as well as comply with Ceasefire's policies and procedures. Suppliers must also provide accurate and transparent information regarding their products, processes, and supply chain to Ceasefire.

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Safety, Health, and Wellbeing

At Ceasefire, safety is our utmost priority, integral to every aspect of our operations. We expect our suppliers to prioritise the health and safety of all workers, contractors, visitors, and the public affected by their activities. This commitment includes:

- Ensuring the health and safety of all individuals by taking practical steps to eliminate or minimise risks to Safety, Health, and Wellbeing (SH&W), including psychological wellbeing.
- Adhering to all relevant laws and regulations concerning SH&W, and comprehensively understanding and following Ceasefires SH&W Management Policies, and Procedures.
- Providing adequate training for workers to perform their duties safely and ensuring there are sufficient competent supervisors onsite. Workers are empowered to speak up and halt any tasks or conditions that pose or could potentially pose a safety risk.
- Prohibiting workers from performing tasks if their ability to perform the job is impaired by legal or illegal drugs, alcohol, or other substances.
- Promptly reporting any SH&W incidents or near misses occurring on worksites to the Ceasefire team.

Safety is non-negotiable, and collaboration with suppliers to uphold these standards is critical to ensuring a safe working environment for all.

Sustainability and Environmental Management

At Ceasefire, we strive to collaborate with our suppliers to mitigate environmental and social impacts. We expect our suppliers to:

- Minimise environmental impact by reducing waste, enhancing energy efficiency, responsibly managing resources, and decreasing pollution and emissions (including greenhouse gases). This includes recycling natural resources, energy, water, and raw materials, while respecting and safeguarding local ecosystems and biodiversity. Suppliers should also encourage their supply chains to adopt similar practices.
- Adhere to Ceasefires policies and procedures regarding sustainability and environmental practices, aligning with our values and commitment to achieving environmental objectives. If necessary, suppliers should develop and maintain project-specific environmental plans to manage activities with potential environmental impacts.

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- Provide sustainable alternatives when offering goods and services to promote more environmentally friendly outcomes. Suppliers must also comply with contract provisions related to sustainability and environmental standards.

Collaborating closely with suppliers on these initiatives reinforces our shared responsibility to minimise environmental footprint and promote sustainable practices across our operations.

Competition, Anti-trust, and Anti-corruption, including Conflicts of Interest

Suppliers must adhere to stringent ethical standards and avoid bribery, corruption, and unethical practices. Specifically, suppliers must:

- Commit to fair and open competition, refraining from anti-competitive practices such as price-fixing, bid rigging, or imposing exclusive dealing arrangements that limit customer choices.
- Refrain from offering bribes, kickbacks, or improper payments to secure or maintain business relationships. They must also avoid sharing sensitive information that could harm competition or customer interests. Any gifts, hospitality, or entertainment offered should be reasonable, transparent, and comply with legal guidelines.
- Maintain accurate and transparent records of all transactions and financial dealings, ensuring compliance with anti-corruption laws. Transparency in business interactions is crucial, with suppliers providing truthful and honest information to customers and partners.
- Educate their employees and stakeholders on competition laws, anti-trust regulations, and anti-corruption policies. Establish mechanisms for reporting suspected violations without fear of retaliation, ensuring whistleblower protections are in place.
- Disclose any actual or potential conflicts of interest that could compromise fair competition or ethical behaviour.

These measures uphold Ceasefire's commitment to ethical conduct and fair business practices, fostering a trustworthy and competitive marketplace.

Data Protection, Privacy, Confidentiality and Cyber Security

We require our suppliers to comply fully with all relevant data protection, privacy, confidentiality, and cybersecurity laws and regulations. Suppliers must uphold standards for data protection, privacy, confidentiality, and security by:

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- Collecting and processing Ceasefires data or personal data only for legitimate business purposes, in accordance with applicable laws and regulations. They must obtain proper consent from individuals before collecting, processing, or sharing their personal data with Ceasefire. Suppliers should limit the collection and retention of Ceasefires data and personal data to what is necessary for the intended purpose, ensuring the accuracy and reliability of the personal data they manage and maintaining mechanisms for data correction.
- Implementing appropriate technical and organizational measures to safeguard Ceasefires data from unauthorised access, loss, disclosure, or alteration. They must also protect confidential information shared by Ceasefire with suppliers, limiting access to authorised personnel only.
- Having a clear plan in place for detecting, reporting, and responding to data breaches, including notifying affected parties and collaborating with Ceasefire to resolve breaches swiftly. Suppliers should regularly assess and address vulnerabilities in their systems and applications to prevent cyberattacks.

These measures are essential to maintaining the integrity, security, and confidentiality of data shared with or managed by suppliers in our business relationships.

Quality Assurance - Product and Service Conformance

We take pride in maintaining rigorous standards and promoting consistency throughout our supply chain. At Ceasefire, we prioritise ethical business practices, quality, and compliance with all applicable laws and regulations. It is crucial to us that our suppliers deliver products and services that not only meet but exceed agreed-upon specifications, requirements, and performance standards. Therefore, we require our suppliers to:

- Establish and maintain an effective quality management system that ensures consistent conformity of products and services. This includes implementing appropriate documentation, process controls, corrective actions, and fostering a culture of continuous improvement.
- Understand, comply with, and manage processes for design, technical specifications, functional requirements, performance standards, process controls, testing, inspections, and audits as stipulated in their contract agreement with Ceasefire and/or manufacturer's specifications.
- Emphasize ongoing improvement in product and service quality, encouraging suppliers to proactively identify opportunities for enhancing their processes and products.

By adhering to these requirements, our suppliers contribute to our collective goal of maintaining high standards of quality, reliability, and customer satisfaction across all our operations.

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Social Responsibility

Ceasefire expects our suppliers to align with our principles of diversity and inclusion, as well as our commitment to societal impact, including social procurement and community engagement. We value suppliers who actively participate in and contribute to local communities, and we ask our suppliers to:

- Collaborate with Ceasefire to support and implement initiatives that promote community investment and development. This includes engaging with local enterprises, Aboriginal businesses, and community groups, while respecting local cultures, traditions, and values.
- Support and engage with local, disadvantaged, and minority group suppliers. Demonstrate a commitment to achieving diversity targets that align with Ceasefire's dedication to diversity and inclusion on our worksites and premises. Suppliers are expected to report on their local community engagement associated with Ceasefire's projects as required by contract.
- Contribute to increasing employment opportunities for apprentices, trainees, youth, women, Aboriginal and Torres Strait Islander people. Support the sustainable growth of Aboriginal businesses and provide information on their social responsibility initiatives, including progress and challenges, as needed.
- Complete subcontractor tender interviews and assessment questionnaires accurately and honestly. This includes reporting on various aspects such as employee numbers, working hours, workplace health and safety practices, safety incidents, workforce composition, environmental practices, training and induction programs, Aboriginal and Torres Strait Islander participation, female participation, apprentice and trainee participation, payment of workers' entitlements, modern slavery considerations, and commitment follow-through.

By adhering to these expectations, our suppliers contribute positively to our shared goals of diversity, inclusion, community engagement, and ethical business practices, enhancing the overall impact of our projects and operations.

Labour and Human Rights

Ceasefire is dedicated to upholding ethical business practices, respecting human rights, and complying with relevant Australian laws and international standards. We require our suppliers to demonstrate a commitment to human rights and fair employment practices aligned with the UN Universal Declaration of Human Rights.

Ceasefire firmly believes that all workers in our supply chain deserve to be treated with dignity, respect, and in compliance with Commonwealth Workplace Laws. We recognise that certain workers may be vulnerable due to factors such as age, experience, or immigration status, and it is crucial to ensure they are aware of their rights under these laws to prevent exploitation. Suppliers must engage their workers lawfully and incorporate appropriate labour and human rights policies and practices across their business operations and broader supply chains.

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Under the Fair Work system in Australia, all individuals are entitled to fundamental workplace protections as outlined in The Fair Work Act 2009 (FW Act).

Our suppliers are expected to take reasonable measures to ensure that businesses within their supply chain do not engage in or support labour or human rights abuses. This commitment ensures that our entire supply chain upholds the highest standards of ethical conduct and respects the rights and dignity of all workers.

Discrimination, Bullying, and Harassment

In accordance with applicable laws, suppliers must ensure there is no discrimination against any worker based on age, disability, ethnicity, gender, marital status, political affiliation, race, religion, sexual orientation, gender identity, union membership, or any other protected status during recruitment, employment, or other worker engagement practices.

Suppliers are expected to:

- Commit to maintaining a workplace that is free from bullying, harassment, victimisation, and abuse.
- Refrain from bullying workers at Ceasefire worksites or subjecting them to unlawful or inhumane treatment, which includes verbal, physical, sexual, or psychological abuse and harassment.
- Implement prevention and risk management practices, including victimisation protections, within their policies and procedures.

Ceasefire maintains a zero-tolerance stance towards victimisation.

Modern Slavery

Under Australia's Modern Slavery Act 2018 (Cth), Ceasefire is mandated to report on measures taken to identify and mitigate risks of modern slavery within its operations and supply chains. Common modern slavery practices in the property and construction sector include forced or unpaid labour, unsafe working conditions, bonded or child labour, inadequate living conditions, passport confiscation, and human trafficking.

We expect our suppliers to actively support our efforts and comply with all relevant Australian laws and regulations pertaining to modern slavery and labour rights, including adherence to the Modern Slavery Act. When selecting and engaging suppliers, we prioritise those who demonstrate proactive measures to prevent modern slavery and show a commitment to collaborating on addressing these critical issues.

This approach ensures that our supply chain operates ethically and upholds the dignity and rights of all individuals involved in our projects.

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Our suppliers must:

- Conduct comprehensive risk assessments to identify and mitigate potential risks of modern slavery in both operations and supply chains, regardless of reporting status.
- Uphold equitable labour practices, ensuring freedom of association, collective bargaining, fair wages, safe working conditions, and reasonable work hours.
- Prohibit child labour and establish guidelines for employing young workers in accordance with relevant laws and international standards.
- Prohibit forced labour, debt bondage, human trafficking, and any form of involuntary servitude.
- Employ only individuals with valid and current work rights in Australia.
- Inform workers about their rights, the risks associated with modern slavery, and available reporting channels.
- Establish mechanisms for workers to report concerns or grievances related to modern slavery, with clear procedures for investigation and remediation.
- Develop internal capabilities to effectively manage and mitigate modern slavery risks and provide reports upon reasonable request detailing efforts to combat modern slavery, including progress, challenges, and future strategies.
- Ensure that temporary and outsourced labour complies with legal limits and that third-party recruitment agencies adhere to this Code and relevant laws.
- Take responsibility for all recruitment-related fees and expenses when hiring foreign contract workers directly or through third-party agencies.
- Promote education and awareness of modern slavery risks within operations and supply chains.
- Make reasonable efforts to ensure that businesses within the supply chain do not engage in or support human rights abuses.
- Avoid sourcing products from conflict-affected regions where possible, which contribute to human rights violations or violence, and ensure transparency in supply chains by disclosing the origins of raw materials to prevent unethical practices.

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Working Hours, Wages, and other Benefits

Respect for workers' rights and adherence to labour standards, we mandate our Suppliers to uphold sustainable, responsible, and inclusive workplace practices concerning working hours, wages, and other benefits, ensuring fair and ethical treatment of workers. Suppliers must:

- Ensure that employees' working hours comply with applicable laws and regulations, including limits on maximum working hours, overtime, and rest periods.
- Specify conditions under which overtime work is permitted and ensure workers are compensated appropriately for overtime hours, adhering to legal requirements.
- Clarify terms and conditions for flexible work arrangements or voluntary overtime, ensuring mutual consent.
- Guarantee payment of at least the legal minimum wage, covering regular hours and overtime.
- Define the frequency and ensure timely and accurate payment of wages (e.g., weekly, fortnightly, monthly).
- Outline permissible wage deductions transparently and with employee consent.
- Provide clear wage statements detailing hours worked, rates, deductions, and relevant information.
- Address various types of leave such as annual leave, sick leave, and parental leave in compliance with laws.
- Determine policies for public holidays, including payment terms and alternative arrangements for working on those days.
- Contribute to superannuation, redundancy, workers' compensation, and other legally required benefits.
- Ensure fair treatment and benefits for workers on non-permanent or part-time contracts, with opportunities for conversion to permanent employment where applicable.
- Offer training, skill development, and career advancement opportunities to enhance workforce well-being.
- Establish reporting mechanisms for workers to report violations without fear of retaliation.
- Maintain accurate records of working hours, wages, and benefits as mandated by law.
- Avoid misrepresenting employment relationships as independent contracting arrangements.
- Ensure third-party subcontractors and labour service providers comply with Commonwealth Workplace Laws and this Code through reasonable efforts.

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Freedom of Association and Collective Bargaining

The rights to freedom of peaceful assembly and association are fundamental pillars of democracy, enabling individuals to express their political beliefs. We require our Suppliers to respect workers' rights to join or not join trade unions, participate in lawful industrial activities, and engage in collective bargaining. Suppliers must strictly prohibit any discrimination, retaliation, or intimidation against workers exercising these rights.

How do I report wrongdoing?

If you have concerns about a potential breach of this Code, it is important to report it. If you suspect any behaviour involving fraud, corruption, mismanagement, or significant misuse of Ceasefires funds, please report it to one of the following individuals: The General Manager or the Directors, depending on the nature of the concern.

If you qualify as an 'eligible whistleblower' under the Corporations Act, Part 9.4AAA provides legal rights and protections. These provisions offer enhanced safeguards for whistleblowers disclosing misconduct involving companies or their officers.

Legislation, Codes and Standards

Work Health and Safety Act 2011 - [Work Health and Safety Act 2011 No 10 - NSW Legislation](#)

Safework NSW – Codes of Practice - [List of codes of practice | SafeWork NSW](#)

Global Reporting Initiative - [GRI - Home \(globalreporting.org\)](#)

UN Global Compact - [The Ten Principles | UN Global Compact](#)

Australian Competition and Consumer Commission (ACCC) - [Home | ACCC](#)

The Privacy Act 1988 - [Federal Register of Legislation - Privacy Act 1988](#)

Australian Human Rights Commission - [About | Australian Human Rights Commission](#)

Fair Work Ombudsman - [Fair Work system - Fair Work Ombudsman](#)

Fair Work Act 2009 - [Federal Register of Legislation - Fair Work Act 2009](#)

Modern Slavery Act 2018 - [Modern Slavery Act 2018 No 30 - NSW Legislation](#)

NSW Government Supplier Code of Conduct - [Supplier Code of Conduct | info.buy.nsw](#)

Racial Discrimination Act 1975 - [Federal Register of Legislation - Racial Discrimination Act 1975](#)

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Sex Discrimination Act 1984 - [Federal Register of Legislation - Sex Discrimination Act 1984](#)

Disability Discrimination Act 1992 - [Federal Register of Legislation - Disability Discrimination Act 1992](#)

Age Discrimination Act 2004 - [Federal Register of Legislation - Age Discrimination Act 2004](#)

Australian Human Rights Commission Act 1986 - [Federal Register of Legislation - Australian Human Rights Commission Act 1986](#)

Corporations Act 2001 - [Federal Register of Legislation - Corporations Act 2001](#)

Whistle Blower Rights And Protections - [Whistleblower rights and protections | ASIC](#)

Slayde Tana

General Manager