

## **PROPEL FUNERAL PARTNERS LIMITED (“PROPEL”)**

### **CODE OF CONDUCT - MODERN SLAVERY ACT 2018 (CTH)**

#### **Background**

This is a Supplier Code of Conduct (**Code**) as part of Propel’s response to the enactment of the Modern Slavery Act 2018 (Cth) (the **Act**). This Code does not include a specific section on modern slavery as this Code is intended to have wider application to all aspects of social, environmental and ethical procurement. Modern slavery falls under both social and ethical procurement and is adequately captured in the sections of this Code.

The process of developing this Code and incorporating it as part of supplier contract documentation, and using it as an assessment tool to assess modern slavery risks in suppliers (e.g. by monitoring supplier’s compliance with this Code) forms part of Propel’s Modern Slavery Statement under mandatory criteria 4 (Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes).

#### **Introduction**

Propel is committed to socially and environmentally responsible procurement and acknowledges this responsibility extends beyond its own operations and into its supply chains. Propel has set standards for the way it does business so its suppliers and customers have clear expectations about the way Propel wishes to conduct business.

#### **Purpose and Scope**

This Code sets out the minimum standards of behaviour Propel requires of its suppliers. It is based on the Responsible Business Alliance Code of Conduct v6.0 effective 1 January 2018, which is a set of social, environmental and ethical industry standards which has been prepared with reference to international norms and standards including the Universal Declaration of Human Rights, ILO International Labor Standards, OECD Guidelines for Multinational Enterprises and ISO and SA standards.

This Code is applicable to all Propel’s contract suppliers. Each supplier is expected to comply with this Code to the extent relevant to that supplier’s specific operations and business.

#### **Overview**

This Code is made up of 5 sections:

- Labour
- Health and Safety
- Environment
- Business ethics
- Management and governance.

Those sections are set out below.

## **1. Labour**

Suppliers shall be committed to uphold human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract and direct employees.

All suppliers must comply with applicable international and national laws and standards in relation to labour practices and human rights.

### **1.1 Voluntary Employment**

Forced, bonded (including debt bondage) or indentured labour, slavery or trafficking of persons shall not be used. This includes transporting, harbouring, recruiting, transferring or receiving persons by means of threat, force, coercion, deception, abduction or fraud for the purpose of labour or service. There shall be no unreasonable restrictions on workers' freedom of movement including unreasonable restrictions on entering or exiting company-provided facilities.

All work must be voluntary, and employees shall be free to terminate their employment in accordance with established laws, regulations and rules. Employees must not be required to surrender their government issued identification, passports or work permits as a condition of employment.

### **1.2 Child Labour & Young Workers**

The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. Child labour should not be used at any level of the supply chain.

Young Workers, those under 18 years of age, shall not perform work that is likely to jeopardise their health or safety, including night shifts and overtime. Work shall not interfere with their education or be harmful to their mental, social or moral development.

### **1.3 Working Hours**

Working hours are not to exceed the maximum set by law of the relevant jurisdiction. Workers shall not be required to work more than 60 hours per 7-day week, including overtime, except in extraordinary business circumstances.

Workers shall be allowed at least one day off every seven days. Overtime shall be compensated at the prevailing overtime rates.

### **1.4 Wages and Benefits**

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. If required by local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted, unless permitted under local laws.

Other deductions for accommodation, meals, transport or personal protective equipment should not exceed the cost to the supplier..

### **1.5 Humane Treatment**

There is to be no harsh or inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers, and no threat of any such treatment.

Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

### **1.6 Freedom of Association and Collective Bargaining**

Suppliers are to respect the rights of workers to associate freely and communicate openly with management regarding working conditions without fear of harassment, intimidation, penalty, interference or reprisal.

Suppliers shall recognise and respect any rights of workers to exercise lawful rights of free association, including joining or not joining any association of their choice (including unions). Suppliers must also respect any legal right of workers to bargain collectively.

### **1.7 Labour Hire**

Workers shall not be required to pay employers' or agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, they must be repaid within 90 days.

As part of the hiring process, migrant workers specifically recruited overseas must be provided with a written employment agreement in their native language that contains a description of terms and conditions of employment prior to the worker departing from his or her country of origin.

Particular attention should be given to the recruitment and treatment of at risk groups, notably migrant workers, refugees and asylum seekers.

### **1.8 Anti-discrimination**

In hiring and any other employment practices suppliers shall not discriminate against any worker based on their age, disability, ethnicity, gender, marital status, national origin, political affiliation, race, religion, sexual orientation, or union membership, such as promotions, rewards and access to training.

Workers or prospective workers should not be subjected to medical tests or physical exams that could be used in a discriminatory way.

Parental and carers' leave should be provided for, at a minimum as required by national law.

### **1.9 Equality, Diversity and Community**

Suppliers shall promote a culture of enabling a supply chain that includes equality and diversity and actively support programs that look to ensure a diverse worker base.

## **2. Environment and Safety**

Every employee has the right to work in a safe and healthy work environment.

All suppliers must make proper provision for the health and safety of their employees, contractors, visitors and those in the community who may be impacted by their operations. Suppliers must comply with applicable international and national laws and standards in relation to health and safety management.

### **2.1 Occupational Safety**

Suppliers are required to ensure worker exposure to potential health and safety hazards (e.g. chemical or electrical hazards, fire, vehicles and fall hazards) are controlled through engineering and

administrative controls, preventative maintenance and safe work procedures, personal protective equipment, and ongoing safety training and educational materials about risks and hazards.

Procedures and process are to be in place to ensure the prevention, management, reporting, classification recording and tracking of occupational injury or illness. Procedures must encourage worker reporting, allow for provision of medical treatment, provide mechanisms for investigation and corrective action and facilitate the return of workers to work.

Workers should be encouraged to raise health and safety concerns and be empowered to refuse to work in unsafe conditions.

## **2.2 Emergency Preparedness**

Potential emergency situations and events are to be identified and assessed, and their impact minimised by implementing emergency plans and response procedures including emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans. Such plans and procedures shall focus on minimising harm to life, the environment and property.

## **2.3 Welfare**

Suppliers shall keep their workplace at a comfortable temperature, have adequate lighting and be suitably ventilated. Work sites shall be adequately clean and hygienic and have sanitary food, preparation, storage and eating facilities. There shall be clean drinking water and clean toilet and washing facilities.

## **2.4 Communication & Training**

Suppliers shall provide workers with appropriate and regular workplace health and safety related information and training, including fire training, production safety, and correct use of protective equipment and first aid equipment. Clear safety warning signs, in the primary language of the workers, shall be displayed on relevant equipment and hazardous or toxic substances or objects.

## **3. Environmental**

We recognise that sustainable economic development is dependent upon environmental protection.

All suppliers must comply with applicable international and national laws and standards in relation to environmental management. Suppliers should consider a lifecycle approach to minimise the environmental impact of its products and services from creation to disposal.

### **3.1 Environmental Permits and Reporting**

All required environmental permits and registrations are to be obtained, maintained and kept current and their operation and reporting requirements are to be followed.

### **3.2 Pollution Prevention and Resource Reduction**

Suppliers are to ensure the efficient use of resources, and ensure that waste of all types, including water and energy, are reduced or eliminated at the source or by practices such as maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

Suppliers are to actively avoid causing environmental damage and/or negative environmental impact through their operations.

### **3.3 Hazardous Materials**

Chemicals and other materials posing a hazard if released to the environment are to be identified and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

Suppliers shall regularly review the use of hazardous substances and substitute them with less hazardous alternatives where reasonably practicable.

### **3.4 Waste Management**

Suppliers shall identify all potential waste streams and ensure processes are in place to manage these in line with the waste hierarchy and all applicable regulations.

Suppliers shall avoid undue and unnecessary use of material and use recycled materials whenever appropriate.

Suppliers shall adhere to all applicable laws and regulations and customer requirements regarding prohibition or restriction of specific substances including labelling for recycling and disposal.

### **3.5 Air Emissions**

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterised, monitored, controlled and treated as required by applicable law prior to discharge.

### **3.6 Energy Consumption and Greenhouse Gas Emissions**

Suppliers should look for cost effective methods to improve energy efficiency and to minimise their energy consumption and greenhouse gas emissions.

## **4. Business Ethics**

Propel expects a certain standard of ethical conduct. Suppliers are expected to be ethical in every aspect of its business, including relationships, practices, sourcing and operations.

### **4.1 Business Integrity**

Propel does not tolerate any form of corruption, extortion or embezzlement.

Suppliers must have a zero tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement (covering promising, offering, giving or accepting any bribes).

### **4.2 No Improper Advantage**

Suppliers must not offer or accept bribes or other means of obtaining undue or improper advantage. This includes offering, authorising, giving or accepting anything of a value of more than \$100 to Propel staff or representatives, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage.

### **4.3 Disclosure of Information**

Suppliers shall disclose all information regarding their labour, health and safety, environment practices, business activities, structure, financial situation and performance in accordance with the applicable laws, regulations and prevailing industry practices.

#### **4.4 Conflict of Interest**

Suppliers must make Propel aware of any actual or potential conflicts of interest that are relevant to Propel's business. For example, the supplier shall declare if it believes one of Propel employees or contractors has an interest or economic tie to the supplier's organisation.

#### **4.5 Intellectual Property**

Intellectual property rights must be respected, and all use of technology, information and know-how shall be conducted in a manner which promotes intellectual property rights and does not compromise the intellectual property of Propel.

#### **4.6 Fair Business, Advertising and Competition**

Suppliers shall uphold standards of fair trading (in accordance with the meaning defined by World Fair Trade Organisation), advertising and competition.

#### **4.7 Data Protection and Privacy**

Suppliers must protect the reasonable privacy expectations of personal information obtained from those they do business with, including suppliers, customers, consumers and employees. Suppliers must comply with data privacy and confidential information and security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

Suppliers shall not use or disclose any information belonging to Propel, its existing and prospective customers, other suppliers, employees and other third parties, except as required or authorised in writing by Propel.

#### **4.8 Protection of Identity and Non-retaliation**

Suppliers shall maintain programs that ensure the confidentiality and protection of supplier and employee whistle-blowing. Suppliers should have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

#### **4.9 Responsible Sourcing of Material**

Suppliers shall exercise due diligence on the source of materials and make their due diligence measures available to Propel on request. Suppliers that manufacture, or where their main business is trading, electronic products must have a policy to reasonably assure that the products used do not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of Congo or any adjoining country.

#### **4.10 Compliance**

Suppliers must comply with all applicable local laws and regulations in all the countries in which they operate. Where this Code goes further than local standards, suppliers must adhere to this Code in a way that is appropriate.

### **5. Management system**

Suppliers should ideally adopt or establish a management system which is designed to ensure compliance with applicable laws, regulations and customer requirements related to their operations and products, conformance with this Code, and identification and mitigation of operational risks related to this Code.

## **Supplier Compliance**

Propel may verify the compliance of all its direct suppliers with this Code. Such verification will be conducted by way of a supplier self-evaluation or, where agreed, an audit or quasi audit by Propel (or an external resource designated by Propel) who may visit the supplier's facilities with appropriate notice.

Compliance with the principles contained in this Code is a criteria that will be taken into consideration in Propel's supplier selection process.

Whenever a situation of non-compliance is identified or a supplier finds it difficult to undertake appropriate measures, this should be reported and shared with the relevant representative of Propel. As a preferred course of action, Propel commits to work with suppliers to develop and implement a corrective action plan to improve the situation. Should there be instances of repeated non-conformance, Propel will regard such conduct as a serious failure to adhere to this Code and reserves its rights accordingly.

## **Contact**

To raise a concern, the supplier can send an email to: [fhenderson@propelinvestments.com.au](mailto:fhenderson@propelinvestments.com.au)

Propel will use its reasonable endeavours to ensure that all raised compliance issues are resolved quickly, fairly and at the proper level within Propel.

\_\_\_\_\_END\_\_\_\_\_