



Supplier Code of Conduct

1 December 2024

QAL's goal is to operate a safe, stable and sustainable business, producing a quality product and providing a secure future for both our team and the Gladstone community.

To do this, we want to partner with suppliers who share our same vision.



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Delivering Our Promises

Queensland Alumina Limited's (QAL's) core values of respect, integrity, teamwork and accountability serve as a foundation of doing business the right way with customers and communities and you, our suppliers.



In everything we do, **we hold ourselves accountable to the highest industry standards** and our own stringent requirements for ethical conduct. This is not only the right thing to do, it is critical to maintaining trust and our social license to operate.

We choose to work with suppliers who act with integrity. We are committed to acting ethically and expect our suppliers to demonstrate the same commitment to business integrity. Through our sourcing and procurement activities, we aim to create sustainable value in partnership with our suppliers. We prioritise developing long term relationships with suppliers based on transparency and mutual benefit.



At QAL, we process the Earth's mineral resources with a relentless drive for improvement through innovative thinking and disciplined delivery. The product we supply helps make modern life work and helps the world to grow.

You, as one of our suppliers, play a vital role in helping us deliver the promises we make. We all rely on the trust of each other, our local communities, governments, customers, investors and others. **We will only succeed if we collaborate and can build trust together.**

This Supplier Code of Conduct, which draws upon internationally recognised standards and QAL's policies and procedures, sets our expectations of you, your subsidiaries and subcontractors. We may elect to not work with or cease to work with suppliers who do not meet our expectations.

Our partnerships with suppliers extend beyond transactional relationships—they are vital to our objective and vision:

“Safe, Stable, Sustainable, Responsibly Growing Value for Generations to come”.

By collaborating closely with our suppliers, we leverage collective expertise and resources to drive meaningful change and foster sustainable growth for all stakeholders involved. Working together, all of us will ensure we do business the right way.

If you have questions regarding this Supplier Code of Conduct, or about our expectations of our suppliers and business partners, please email Holmesmt@qal.com.au.



Who is a Supplier to QAL?

Suppliers provide goods and perform services to and for QAL. This includes contractual agreements we may have with subcontractors, affiliates, subsidiaries and intermediaries of direct suppliers.

Who does the Supplier Code of Conduct apply to?

You, our suppliers. Your employees, contractors, subcontractors and suppliers in your supply chain, which are associated with and or engaged by you, for the goods you supply or the services you perform to QAL.

What is the impact of laws, regulations and contractual obligations?

Suppliers are expected to comply with laws and regulations in jurisdictions in which they operate. The conduct provisions set out in this Supplier Code of Conduct are additional requirements and do not replace such laws and regulations. Where local laws and regulations set standards that are less stringent than the conduct provisions in the Supplier Code of Conduct, we expect suppliers to strive towards the higher standard.

Suppliers are expected to adhere to the conduct provisions of the Supplier Code of Conduct in addition to any other obligations set out in contracts and other ancillary agreements.

Supplier Compliance

Failure to comply with the Supplier Code of Conduct may result in QAL electing to not work with, or discontinue collaboration with, suppliers who do not meet our expectations. Where appropriate, suppliers will be given the opportunity to improve their degree of compliance to certain provisions of the Supplier Code of Conduct.

QAL's commitment to our suppliers

QAL employees and contractors are bound by our *Employee Code of Conduct*, this means we seek to treat our suppliers fairly and ethically and act with integrity when we engage you.

QAL:

- Does not ask our suppliers to act in ways that put them in breach of the Supplier Code of Conduct.
- Pays suppliers for the performance of services and supply of goods in a timely manner and in accordance with the terms set out in our agreements with them.
- Take risk-based steps to promote our suppliers understanding of our Supplier Code of Conduct expectations.



Health and Safety Performance

We commit to the goal of everyone going home safe and healthy after every shift, every day. We work with suppliers who share this commitment by:



- Providing a safe and healthy working environment for employees, contractors and subcontractors including provision of appropriate personal protective equipment and training to use such equipment.
- Taking all practical and reasonable measures and comply with all applicable health, safety, and environmental (HSE) requirements and laws to eliminate workplace fatalities, injuries and disease.
- Ensuring any worker housing, if provided, complies with legal requirements, is clean, safe, structurally sound, sanitary and meets the basic needs of the workforce, while respecting workers' dignity and right to privacy and accommodates diverse needs including accessibility options
- Promptly report all safety incidents, conduct thorough investigations, and seek to learn and continuously improve.
- Handle and transport hazardous chemicals and dangerous materials safely and in accordance with applicable laws.
- Always adhere to equipment safety specifications.

Due Diligence, Business Integrity, and Legal Compliance

We believe in knowing our suppliers. We choose to work with suppliers who act honestly, ethically and with integrity. We work with suppliers who provide requested information that is timely, accurate and relevant and who take risk appropriate steps to know their own suppliers.

Reporting violations and raising concerns, **we foster a culture of transparency** and encourage employees, contractors, suppliers, and other stakeholders to speak up about their issues and concerns without fear of intimidation or retaliation. **We do what is right, not what is easy.**

We compete ethically and lawfully in all activities. We work with partners and suppliers who commit to:



- Provide timely and accurate responses to QAL due diligence questionnaires and other information requests.
- Provide complete and accurate beneficial ownership information.
- Adhere to agreed mitigation measures following due diligence assessments.



- Provide appropriate training to their employees and contractors on complying with this Supplier Code of Conduct.
- Maintain a program of work to understand the risks associated with their third parties, that is appropriate to the size and complexity of their operations.
- Share with QAL, upon request, their steps to understand the source of materials in their supply chains, any identified business integrity, human rights and environmental risks, and the steps taken to mitigate any identified risks.
- Comply with all applicable laws and regulations.
- Conduct all business in an honest and ethical manner.
- Maintain accurate financial books and business records, including invoicing, in accordance with all applicable legal and regulatory requirements and accepted accounting practices.
- Ensure personal activities and interests, and those of employees and subcontractors, do not conflict with their responsibilities to QAL.
- Not commit, or become involved in, bribery or corruption of any form, including demanding or facilitation of payments.
- Refrain from offering payments, gifts, benefits or donations with the purpose of creating an unfair advantage during procurement activity or any other business deals.
- Comply with applicable competition/anti-trust laws, and refrain from sharing non-public pricing information with competitors or making any form of agreement to segment or divide markets.
- Manage cyber security risks when in possession of private QAL employee information, contractor information, stakeholder information, or proprietary information shared or obtained to perform contracted services or supply goods.
- Maintain policies and practices to manage business integrity risk, allow violations, misconduct, or grievances to be reported by workers and addressed without fear of retaliation.

What is.....?

Bribery means the giving, offering or promising of a financial or other advantage to a person to:

- (a) improperly influence a person to obtain or retain a business or personal advantage; or,
- (b) induce or reward the improper exercise of the duties or functions of a person within the public or private sector, including a foreign public official or a Commonwealth public official.

Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action.

Corruption means the abuse of entrusted power or position for private gain. The benefit can be direct or indirect.

Benefits are generally used to recognise and strengthen working relationships between the Company and its business partners. However, depending on the size, frequency, and circumstances, benefits can be viewed to be inappropriately influencing business decisions.



Human Rights and Social Values

QAL is committed to and respects Human Rights in accordance with the Universal Declaration of Human Rights and the United Nations' Guiding Principles on Business and Human Rights. QAL's Social Values ensure we support the dignity, wellbeing, and human rights of our employees, partners, suppliers, contractors, the communities in which we live, and those affected by our operations.



We adopt a zero-tolerance policy to discrimination or harassment of any kind, and operate our business with dignity, honesty and integrity in all our business dealings and relationships. We are devoted to implementing and enforcing effective systems and controls to ensure Human Rights and Social Values are respected in our operation and supply chains. We expect our suppliers to uphold these fundamental principals in their interactions as well.

How we treat each other matters; we work with suppliers who:

- Respect the diverse cultures and heritages of the local Gladstone community.
- Recognise and respect the rights of Indigenous Peoples.
- Provide fair remuneration and working conditions (including reasonable working hours, overtime, breaks, and no retention of original identity documents) for workers in accordance with applicable laws or collective bargaining agreements and provide all workers with written contracts in languages they are capable of understanding.
- Respect the rights of workers to participate in freedom of association and/or collective bargaining activities.
- Work to implement core international business and human rights standards, including the United Nations Guiding Principles on Business and Human Rights.
- Reject any form of slavery in their operations and supply chain, including but not limited to forced, bonded, or child labour or anyone under the minimum age in their operations.
- Promote inclusion, diversity and equality within their workforce and actively foster a culture of respect and dignity for all individuals, regardless of race, ethnicity, gender, sexual orientation, disability, religion, or any other characteristic protected by law.
- Do not tolerate harassment (physical, verbal, sexual) or adverse discrimination.
- Consult with the Gladstone community to minimise and compensate for any adverse social impacts of their activities.
- Undertake due diligence activities to identify, prevent and mitigate adverse human rights impacts.



- Provide access to independent grievance mechanisms and not obstructing access to other judicial or non-judicial remedies.
- Take action to remedy adverse human rights impacts that their Company may have caused or contributed to.
- Adhere to applicable laws for young workers (such as trainees, graduates, apprentices) to only perform supervised, safe, and decent work that does not interfere with their education.
- Include labour and human rights expectations in their contracts with their third parties.
- Take measures appropriate to the nature and context of their business to conduct risk based human rights due diligence on their supply chain.



What is Modern Slavery?

Modern slavery is a violation of an individual's dignity and human rights and refers to situations of serious exploitation where coercion, threats or deception are used to exploit victims and undermine or deprive an individual of his or her freedom. Modern slavery is an umbrella term that includes the crimes of slavery, servitude, forced labour, debt bondage, deceptive recruiting for labour or services, trafficking in persons, forced marriage and the worst forms of child labour.

Please read more about QAL's commitment to address modern slavery in our annual statement: [Modern Slavery Statement \(riotinto.com\)](https://www.riotinto.com/modern-slavery-statement)

If suppliers cause or contribute to an adverse impact on human rights in their business activities and supply chain, we expect that they will provide for, or cooperate in, processes to enable an appropriate remedy. Where relevant, QAL collaborates with suppliers and others to support remedy of adverse human rights impacts.

Emergency Preparedness and Business Resilience



We work with suppliers who have adequate emergency preparedness and response plans for safeguarding their employees, operations, and security of supply in times of natural events, major catastrophe, pandemic disease, and unforeseen events.

Environmental Performance

We are committed to protecting the environmental values of our local community and maintaining good product stewardship for the long term. We are dedicated to the responsible use of our shared natural resources and to decarbonise our operations. We expect our suppliers to share this commitment to environmental responsibility.



We work with suppliers who share our commitment as demonstrated by:

- Promoting a culture that values the environment and acts to protect the environment in which they operate.
- Ensure compliance with applicable environmental laws and regulation.
- Ensure environmentally responsible disposal of hazardous material in accordance with applicable laws.
- Measure, manage, and report environmental data in accordance with applicable laws and regulations.
- Continuously improving environmental and resource management – reduce, reuse and recycle.
- Ensuring products manufactured or contracted to manufacture do not contain conflict minerals.
- Take measures appropriate to the nature of their business to:
 - Ensure appropriate management systems are in place to understand the life cycle of their products.
 - Assess their impact on climate change, reduce their carbon footprint and provide emissions data as part of life cycle assessments.
 - Assess and avoid, minimise, or manage any impact they may have on biodiversity, ecosystems, and communities' use of natural resources.
 - Assess and manage any waste and pollution (including air, water, soil) that may result from their business activities.
 - Conserve water, promote water quality, responsibly manage tailings, and use marine resources sustainably.
 - Promote the use of sustainably certified products, fostering circularity by encouraging recycling and re-use when conducting business activities.



Local Community, Indigenous and Supplier Engagement



We aim to develop strong and lasting relationships with our local and regional communities based on respect, a desire to learn and mutual benefit. We aim to create sustainable value in partnership with our suppliers.



In everything we do, **we demonstrate consistent ethical behaviour, put integrity at the centre of our decisions and hold ourselves accountable for our choices.** We prohibit any and all conduct that could constitute, or appear to constitute, bribery and corruption.

We conduct all sourcing and procurement activities in a fair, objective, transparent and professional manner. We promote open communication, treat our suppliers equitably and act with integrity when we engage with them. We choose to work with suppliers who share these values, who act honestly, ethically and with integrity.

We expect our suppliers to:

- Proactively promote and support community engagement initiatives aimed at employing, procuring and building capacity within our regional supply markets and community.
- Promote local social, economic, and institutional development.
- Actively collaborate with QAL to create sustainable value businesses in our community.
- Deliver best commercial outcomes, offering innovative solutions customised to business demand, while collectively managing risk, value and price.
- Negotiate honestly, ethically and transparently, resulting in commercial agreements of mutual benefit.
- Openly participate in our pre-screening process, which requires companies and individuals to provide sufficient evidence to meet or exceed minimum standards of health, safety, the environment, human rights, quality management and financial capacity, as well as ethical and anti-corruption practices.
- Comply with any and all Site Conditions and agreed Purchase Order or Contract terms of engagement.
- Comply with any applicable local and Indigenous procurement laws.
- Understand and protect cultural heritage.
- Report to QAL as soon as known any instances where their activity may harm or have harmed cultural heritage sites or objects as well as any adverse impacts on the surrounding community.
- Foster, where practically and commercially possible, sustainable development in local and Indigenous communities by:
 - Employing individuals who reside in the local and Indigenous community.



- Engaging suppliers who proactively support the local and Indigenous communities.
- Establishing or participating in community programs that foster, encourage and/or contribute to positive social, environmental and/or economic development — such as health and wellbeing, education, and learning and economic empowerment — that better prepare local and Indigenous communities to participate in ways that matter most to them.
- Providing culturally appropriate grievance mechanisms that are accessible and trusted for use by local and Indigenous Peoples and reporting back to QAL if there are any concerns.

Management Commitment

Suppliers who work with QAL share our commitment to the principles raised in this Supplier Code of Conduct by adopting and promoting the commitments in the code and encouraging their subcontractors to do the same.



We are committed to a culture of mutual respect, transparency, social, economic and environmental responsibility and encourage employees, contractors, suppliers and other stakeholders join us or to speak up about their issues and concerns.

As a supplier to QAL, you and your workers have access to **myVoice**, QAL's confidential and independently operated whistleblowing service. Further information on our policy on whistleblowing can be found in our Whistleblower Policy (P901.006).

myVoice is a confidential, independent and safe way to report concerns or misconduct directly to us. It offers an avenue for reporting concerns about the business or an individual's behaviour. This can include suspicion of violations of QAL's policies and procedures, human rights, safety, environmental, financial reporting, fraud or business integrity issues in general.

All information received is managed securely and confidentially. We strongly encourage any supplier (including their workers) who becomes aware of any circumstance or action that may not comply with this Supplier Code of Conduct to discuss these concerns with their Queensland Alumina Limited contact one QAL's Designated Disclosure Officers at cosec@qal.com.au or report it via **myVoice**.

If you have a concern, don't ignore it; let us know via **myVoice**. Log a report on the **myVoice** website www.riotintomyvoice.com Email the Business Conduct Office directly at myvoice@riotinto.com or call the **myVoice** hotline on **1300 729 358**.

