Holding Redlich

Supplier Code of Conduct



INTRODUCTION

Holding Redlich is committed to socially and environmentally responsible procurement and acknowledges this responsibility extends beyond our own operations and into our supply chains. Holding Redlich have set high standards for the way we do business so our suppliers and clients have clear expectations about the way we conduct business.

PURPOSE AND SCOPE

Our Supplier Code of Conduct (**Code**) sets out the minimum standards of behaviour we require of our suppliers. It is based on the Responsible Business Alliance Code of Conduct 7.0 effective 1 January 2021, 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 Labour Standards, OECD Guidelines for Multinational Enterprises and ISO and SA standards.

Our Code is applicable to all contract suppliers. Suppliers are expected to not only comply with the Code but to also implement this Code in their own supply chain.

1. Labour

Suppliers are expected to uphold the 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, direct employees and any other type of worker.

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

1.1 Anti-discrimination

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, in hiring and other employment practices such as promotions, rewards and access to training.



1.2 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 – nor is there to be the threat of any such treatment.

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

1.3 Prevention of involuntary and underage employment

Suppliers are expected to:

(a) ensure that all work is undertaken without coercion, threat, force, deception, abduction or fraud;

(b) not use any form of forced, bonded or indentured labour, slavery or trafficking of persons; and

(c) employ only workers who are the applicable minimum legal age.

All use of temporary and outsourced labour should be within the limits of the law. Suppliers are therefore expected to:

(a) use all reasonable endeavours to ensure that the third party recruitment agencies it uses are compliant with the provisions of this Code and applicable law; and

(b) be responsible for payment of all recruitment related fees and expenses in recruiting foreign contract workers either directly or through third party agencies.

1.4 Working hours, wages and benefits

Suppliers must:

(a) follow all applicable laws and regulations with respect to wages, working hours and workers compensation insurance;

(b) ensure that all workers receive their legally mandated minimum wages, benefits, superannuation, leave entitlements and time off for legally recognised holidays; and

(c) pay workers' wages as required under applicable laws in a timely manner and not be expected to use wage deductions as a disciplinary measure. All overtime is expected to be reasonable and paid at the rate and in accordance with the applicable laws.

1.5 Freedom of association and collective bargaining

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 without fear of harassment, intimidation, penalty, interference or reprisal. Suppliers must also respect any legal right of workers to bargain collectively.



2. Health 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 Workplace health and safety management

Suppliers must comply with all applicable laws relating to workplace health and safety.

Suppliers are expected to:

(a) manage occupational health and safety hazards;

(b) implement emergency plans and response procedures;

(c) provide workers with appropriate and regular workplace health and safety related training.

3. Environmental management

Holding Redlich is committed to promoting environmental responsibility. Suppliers are expected to minimise the environmental impact of their operations and maintain environmentally responsible policies and practices. Suppliers must comply with applicable international and national laws and standards in relation to environmental management.

3.1 Environmental impacts

Suppliers are expected to manage the environmental impact of their operations by:

(a) ensuring the safe storage, transportation and disposal of hazardous substances including hazardous waste;

(b) maintaining policies and practices for the efficient use of energy, water and natural resource consumption; and

(c) maintaining policies and practices that reduce the risk of pollution, loss of biodiversity, deforestation, damage to ecosystems and greenhouse gas emissions

4. Business ethics

Holding Redlich expects the highest standards of ethical conduct and compliance with all applicable laws. Suppliers are expected to be ethical in every aspect of its business, including relationships, practices, sourcing and operations.

4.1 Business integrity

Suppliers are expected to comply with all anti bribery, anti-corruption, anti money laundering, and modern slavery laws. Suppliers must not engage in, either directly or indirectly, fraudulent, corrupt, exploitative or collusive activities.

4.2 Documentation and records

Suppliers are expected to maintain adequate records that accurately record all financial transactions and information regarding its business activities, labour, health and safety and environmental practices in accordance with applicable laws, policies and procedures. Disclosure of information is expected to be undertaken without falsification or misrepresentation.

4.3 Confidentiality

Suppliers must not improperly use any private, confidential or commercially sensitive information in its possession relating to or in connection with its dealings with Holding Redlich.

4.4 Conflict of interest

Suppliers must declare to Holding Redlich any situation that raises an actual, potential or perceived conflict of interest related to or in connection with its dealings with Holding Redlich. Suppliers must not enter into any financial, business or other relationship which may compromise the performance of their duties under their business arrangement with Holding Redlich.

5. Corporate governance

Suppliers are expected to maintain sound management administration processes and ensure compliance with applicable laws, regulations and customer requirements related to the Suppliers' operations and products.

5.1 Risk assessment and management

Suppliers shall develop and implement processes to identify the environmental, health and safety and labour practice and ethics risks associated with supplier's operations.

Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to control the identified risks and regulatory requirements.

5.2 Critical incident management

Suppliers should:

(a) identify and assess potential critical incident, emergency situations and business continuity risks; and

(b) develop and implement emergency plans and response procedures that minimise harm to life, environment and property, while minimising disruption to business continuity.

5.3 Audits and assessments

To ensure compliance with this Code and the applicable laws, Suppliers are expected to:

(a) perform periodic evaluations of their facilities and operations, and the facilities and operations of their subcontractors; and

(b) cooperate openly and honestly with any Holding Redlich audit, assessment or review.

CONTACT

To raise a concern, the supplier can send an email to: Joel Lentin joel.lentin@holdingredlich.com.

Holding Redlich will ensure that all raised compliance issues in the Code are resolved quickly, fairly and at the proper level in Holding Redlich.





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