



## Todd Corporation Limited Supplier Code of Conduct

### 1 Introduction and Purpose

The Todd Corporation and its related entities (together, being Todd) seek to work with suppliers who share a commitment and approach to conducting business with integrity, safely and in an ethically and environmentally responsible manner.

This Supplier Code of Conduct (Code) sets out the expectations that Todd has of its suppliers and is founded on the Todd Operating Principles.

### 2 Applicability

The Code applies to all Todd suppliers, their suppliers, and any sub-contractors regardless of spend value. These organisations and individuals are expected to comply with this Code. In the unlikely event of any inconsistency, contracts will take precedence over this Code.

### 3 Compliance with laws

The expectations set out in this Code are not replacements or substitutes for any applicable laws, nor do they amend, supersede, or prevail over any obligations specified in a separate contract between Todd and a supplier.

Suppliers are expected to comply with all laws that apply to their own business operations and make reasonable enquires to ensure that their suppliers do the same. Any known or suspected incidents of non-compliance should be promptly reported to Todd.

Todd reserves the right to seek clarification from suppliers regarding their compliance with this Code.

At Todd's request, and following reasonable notice, the supplier will provide Todd or its nominated representative with the relevant documentation and information.

Where non-compliance with this Code is identified, Todd will (if appropriate) contact the supplier to investigate, rectify and ensure repeated non-compliance is avoided.

#### **Principle 1: Value our People**

***"We will all have a safe workplace"***

### 4 Human rights and modern slavery

Suppliers are expected to meet the responsibilities of business set out in the UN Guiding Principles on Business and Human Rights including:

- a) Ensuring no use of forced or compulsory labour, human trafficking, child labour, slavery or servitude and that all work is conducted voluntarily, without threat of penalty or sanction and not based on deception.
- b) Identifying, avoiding, minimising and/or mitigating and remedying any human rights impacts on communities.

- c) Making all reasonable efforts to ensure that businesses within their supply chain are not engaged in, or complicit with, human rights abuses such as forced or child labour.
- d) Ensuring all personnel, temporary or outsourced labour (including making reasonable enquiries in relation to those personnel in the Supplier's supply chain) meet the local legal minimum labour age permitted by the law of the country where the labour occurs and are paid a proper and competitive wage which meets their basic needs and provides discretionary income and is no less than the standards required by local laws.

## **5 Creating a safe work environment that fosters individual and collective success**

Todd endeavours to achieve industry leading health and safety performance and is committed to providing a workplace that is safe for its personnel, suppliers, and the public.

Todd wants to procure goods and services from suppliers that conduct business in a way that supports Todd's operating principles including:

- a) No business objective will take priority over health and safety
- b) A requirement that our suppliers and contractors demonstrate the same commitment to achieving excellence in health and safety performance
- c) Compliance with relevant legislation, regulations, codes of practice and industry standards

Suppliers are required to:

- d) ensure their personnel comply with Todd's HSE policies while on Todd property
- e) encourage their workforce to report any accident, injury, illness, or unsafe condition immediately, and stop work that could be unsafe, so that appropriate action can be taken.

Additional specific security, health and/or safety information requirements may also be specified in a written contract between Todd and a supplier.

## **6 Non-discrimination, grievance processes and freedom of association**

We value working with businesses that provide a workplace that:

- a) Is free from any harassment, exploitation, intimidation, inhumane treatment and discrimination including based on race, ethnicity, religion, national origin, disability, age, sexual orientation, gender or marital status.
- b) Has mechanisms to allow personnel to speak up or raise grievances without fear of retaliation.
- c) Respects every person's workplace rights and entitlements and ensures compliance with all relevant workplace laws and regulations.
- d) Provides a means for its personnel, suppliers, and business partners to speak up if they see something that is unsafe, unethical or potentially harmful.

## **Principle 2: Care for the Environment and Community**

***"We will operate in an environmentally responsible manner"***

Todd endeavours to achieve sector leading environmental performance. Todd wants to procure goods and services from like-minded suppliers.

## **7 Supporting Environmental priorities**

Suppliers can demonstrate their commitment to operate in an environmentally sound manner by enhancing environmental sustainability through:

- a) reducing waste and recycling initiatives,
- b) reducing and/or offsetting carbon emissions,
- c) reducing the use of energy, water or other resources,
- d) reducing the use of hazardous and toxic substances, and
- e) ensuring correct disposal of waste and minimisation of packaging.

## **Principle 3: Maintain a High Standard of Conduct**

***“Acting with integrity and the highest ethical standards”***

Todd expects its suppliers to manage their activities and affairs and conduct themselves with the highest standards of integrity.

## **8 Bribery and corruption, money laundering, conflict of interest and anti-competitive conduct**

Suppliers are expected to promote transparency and accountability in the conduct and administration of their business by having in place effective processes and procedures to proactively prevent:

- a) Extortion, embezzlement, bribery and corruption, including expressly prohibiting the direct or indirect giving, paying, promising, or accepting of anything of value to obtain, retain or direct business, to secure an improper advantage or to influence someone including government officials to improperly perform their duties.
- b) Money laundering, including the act of hiding illegal funds (especially those with possible links to terrorism or criminal activity) or giving such funds apparent legitimacy.
- c) Actual or apparent conflicts of interest between personal and business interests, including using Todd information and resources for improper gains.
- d) Anti-competitive conduct, including any form of agreement or understanding with competitors to fix prices, rig bids or restrict supply.
- e) Inappropriate provision of gifts, entertainment or meals to Todd personnel or third parties representing Todd. When legitimately required they should be of modest value, appropriately timed and given in good faith.

## **9 Protecting confidential information**

Suppliers are expected to have effective protocols in place for securing and protecting Todd information including:

- a) Respecting the proprietary and intellectual property rights of Todd.
- b) Having information classification protocols and adopting industry best practices on sharing, protecting and securing information.
- c) Observing all data privacy legal requirements on the collection, processing, storing, transfer and disposal of Todd data.
- d) Reporting any suspected or actual information security incidents that impact Todd information or systems to Todd as soon as practically possible.

## **Principle 4: Create Value**

***"Placing customer satisfaction at the centre of everything we do"***

Todd looks to build strong supplier relationships that supports it to place customer satisfaction at the centre of everything it does.

Suppliers must ensure appropriate controls are in place to protect Todd's brand and intellectual property against unauthorised use and damage.

Suppliers are encouraged to share their ideas with Todd so that together it helps create value for customers and its respective businesses through innovation and continuous improvement.

## **10 Review cycle**

Updates to this Code may be made from time to time and will be available on our website  
**<https://toddcorporation.com>**

## **11 References**

For further information please refer to the following:

- Todd Operating Principles
- Todd HS&E Policies
- UN Guiding Principles on business and human rights
- International Labour Organization (ILO) conventions
- UN Universal Declaration on the rights of the child



**N J Olson**  
**Group Chief Financial Officer**