



SUPPLIER CODE OF CONDUCT



VEOLIA GROUP

Veolia Australia and New Zealand is part of a worldwide group of companies that provide water, waste and energy management solutions.

Through its three complementary business activities, Veolia works to develop, preserve and replenish the resources that are essential to secure a desirable and sustainable future for our society.

Veolia's latest strategy, GreenUp, encompasses our commitment to provide affordable and responsible solutions to our customers and the communities we serve.

The delivery of our vision requires the cooperation of all participants in our value chain. Accordingly, we choose to partner with suppliers and customers who share the same values.

MULTI-FACETED PERFORMANCE

Veolia's suppliers are encouraged to find innovative ways to deliver measurable value across financial and non-financial performance areas; thereby enabling us to achieve our targets and meet our obligations to all our stakeholders.

This code of conduct outlines our expectations of our suppliers in relation to responsible and ethical procurement practices across the key themes of full legislative and regulatory compliance, labour and human rights, ethical conduct, duty of care to people and planet, and continuity of supply.

All our direct suppliers must honour the standards outlined in this code of conduct and ensure they enshrine similar obligations into their contracts with their own suppliers. Our suppliers undertake to monitor and review their own supply chain regularly to assess and address risks of non compliance.

This collective due diligence is imperative to increase our confidence in the integrity of our extended supply chain. It will remain an essential component of our compliance program whilst we work to increase the visibility of our tier two and three providers. Supplier cooperation in this regard is expected.



Acknowledgement of this code of conduct is a condition of trade for all direct suppliers of Veolia Australia and New Zealand.

WORKPLACE HEALTH AND SAFETY (WHS)

Veolia is committed to protecting the health, safety, and well-being of staff, contractors and the general public. We intend for everyone to return home safe and well after work, every day. This expectation extends to our supply chain. Veolia's suppliers must prioritise safety in the same manner.

Veolia's suppliers must honour the following obligations:

- Ensure full compliance with all legislative and regulatory health and safety obligations applicable to their operations and hold their own suppliers accountable to the same commitment.
- Maintain a health and safety management system appropriate for their operations and ensure roles, responsibilities and actions are understood and honoured by all employees and contractors.
- Monitor leading and lagging performance targets and share results with Veolia upon request.
- Implement proactive management and controls to minimise occupational health and safety risks and support accident prevention.
- Develop, implement and promote written health and safety policies and standards and ensure all employees and contractors comply with their obligations as outlined in these documents.
- Provide appropriate personal protective equipment, resources, instruction, supervision, and job-related training for workers to safely carry out their duties.
- Promptly report all safety incidents to Veolia and regulatory authorities where applicable.
- Conduct thorough investigations, and implement learnings and improvements to prevent reoccurrence.
- Ensure work environments, facilities and worker housing (if provided) comply with legal requirements, are clean, safe, structurally sound, and meet basic needs while respecting workers' dignity and privacy.

FAIR LABOR PRACTICES AND EMPLOYEE RIGHTS

Veolia's suppliers must foster a fair, safe, and respectful work environment that upholds international labour standards and local legislation while supporting the well-being and rights of all workers.

Veolia's suppliers must honour the following obligations:

- Ensure full compliance with all applicable labour laws and regulations, including those related to wages, working hours, benefits, equality and human rights.
- Provide fair compensation, meeting or exceeding minimum wage requirements. If no minimum wage is specified, pay at least the current market rate for the position.
- Provide workers with clear, written contracts in a language they understand, outlining employment terms, conditions, rights and entitlements.
- Establish guidelines for reporting misconduct or unethical behaviour safely and provide these to all workers.
- Ensure reasonable working hours, with regular hours not exceeding 48 per week, voluntary overtime, and adequate rest periods and leave as required by law.
- Respect workers' freedom of association and right to collective bargaining, allowing them to join or form trade unions of their choice.
- Maintain a workplace free from discrimination, harassment, and abuse, promoting diversity and equal opportunity for all employees.
- Implement clear grievance mechanisms for workers to raise concerns without fear of retaliation.

UPHOLDING HUMAN RIGHTS

Veolia's suppliers must ensure that they are not directly or indirectly causing, contributing or linked to human rights abuses such as coercion, involuntary or underage labour or any modern slavery practice.

Veolia's suppliers must honour the following obligations:

- Respect universal human rights and preserve the freedom, dignity, and equality of all individuals.
- Proactively identify human rights risks in their operations and supply chains and develop plans to reduce severe or likely risks.
- Comply with all applicable local and international laws and principles relating to human rights, labour practices, and modern slavery.
- Prohibit all forms of modern slavery, including forced labour, bonded labour, human trafficking, and the exploitation of vulnerable workers.
- Refrain from employing children below the legal working age for their State or Territory and ensure young workers are protected and their education is not compromised.
- Ensure all workers are free to consent to and leave employment with reasonable notice, without losing identity documents or incurring recruitment fees.
- Participate in audits if required and keep Veolia informed of their efforts to prevent exploitation of vulnerable people, such as training, risk assessment, and reporting.
- Facilitate Veolia's supply chain mapping efforts as far as commercially possible, and be willing to collaborate with Veolia to address our Tier Two modern slavery risk.

Suppliers must continuously monitor human rights practices and remediate failures identified in their immediate and extended supply chains. Veolia reserves the right to terminate relationships with suppliers who fail to do this or demonstrate unwillingness to facilitate our human rights due diligence activities.

DIVERSITY AND INCLUSION

Veolia is committed to building an inclusive supply chain that reflects the communities we serve and creates opportunity for all regardless of origin, situation, inclination or location.

Veolia's suppliers must honour the following obligations:

- Implement equitable and merit-based talent identification and recruitment practices that support diversity and inclusion and provide equal pay for equal work.
- Implement and promote anti-discrimination, anti-harassment and equal employment opportunity principles and ensure these are recognised and respected by all employees.
- Prohibit bullying, vilification or victimisation of people based on attributes such as, but not limited to, gender, age, race, religious beliefs, sexual orientation or disability.
- Ensure employees can report inappropriate or offensive behaviour without fear of retaliation.
- Increase supply chain diversity through inclusive subcontracting selection.
- Identify, create and facilitate access to quality economic opportunities for Aboriginal and Torres Strait Islander, Māori and Pacific Peoples and businesses through their employment and procurement choices.
- Participate in diversity and inclusion training if requested.

ENVIRONMENTAL PROTECTION

Veolia intends to accelerate the deployment of affordable, replicable solutions that depollute, decarbonize and regenerate essential resources. We have set ambitious targets in all three of these areas and rely upon the collaboration of our suppliers to achieve them.

Veolia's suppliers must honour the following obligations:

- Comply with all environmental laws, regulations, and standards, applicable to their operations at a minimum, and strive to meet or exceed international best practices.
- Maintain an effective environmental management system appropriate for their operations and ensure roles, responsibilities and actions are understood and honoured by all employees and contractors.
- Assess the carbon footprint and environmental impact of products and services supplied to Veolia upon request, using an agreed methodology.
- Implement strategies to reduce waste generation, greenhouse gas emissions, energy consumption and water usage and be ready to demonstrate progress in this regard quarterly, against recognised standards.
- Support Veolia to deliver our roadmap to net-zero by 2050 and achieve our targets of 50% reduction in scopes 1 and 2 and a 30% reduction in scope 3 emissions by 2032.
- Preserve natural environments, reduce primary resource consumption and promote the circular economy where practicable.
- Consider environmental factors in product design and innovation, identifying opportunities for optimisation and reduced environmental impact.
- Provide emissions data to us upon request to support Veolia's scope 3 reporting obligations.

BUSINESS INTEGRITY AND ANTI-CORRUPTION

A fundamental condition of doing business with Veolia is the prevention of all forms of active and passive corruption and compliance with Australian and International law; including the [Australian Criminal Code Act 1995](#), the [New Zealand Crimes Act 1961](#) and the [Sapin II Act](#).

Veolia's suppliers must honour the following obligations:

- Implement a robust anti-bribery and corruption compliance program, proportionate to their operations and risk exposure, with a strong focus on fostering a culture of integrity.
- Ensure top-level management actively participates in developing, implementing, and overseeing the anti-bribery and corruption compliance program.
- Promote a culture of ethics and compliance throughout their operations with clear guidelines captured in an anti-corruption code of conduct that is disseminated to all staff and stakeholders.
- Refrain from offering any form of solicitation, gifts or invitations that contravene the ethics guide and anti-corruption code of conduct defined by the Veolia Group.
- Proactively identify potential bribery risks in the supply chain, especially dealings with foreign public officials, politically exposed persons, or state-owned enterprises.
- Develop and maintain comprehensive communication and training programs for employees and associates on anti-bribery and corruption policies and procedures.
- Establish a whistleblowing policy as required by local legislation (i.e. [Corporations Act 2001 AU](#)) that encourages the reporting of actual or suspected bribery, while ensuring strong whistleblower protections.

- Regularly monitor, review, and adjust anti-bribery and corruption policies and controls to ensure they remain effective and appropriate in an evolving business environment.

Veolia reserves the right to suspend or terminate agreements with suppliers that fail to meet these standards, with or without notice, for as long as Veolia considers necessary to investigate the relevant conduct. Veolia will incur no liability or obligation to suppliers for such suspension or termination.

AVOIDING CONFLICT OF INTEREST

Suppliers shall avoid conflicts of interest and take active steps to identify and resolve any conflicts identified in their own operations and within their supply chain.

Should suppliers become aware of a conflict of interest involving Veolia and/or its employees, they shall declare it immediately and commence remedial action to negate the conflict of interest without delay.

All actions to be taken shall be documented in a mitigation plan which must be approved by Veolia and implemented directly. Progress must be continually reviewed and will be a quarterly agenda item.

COMPLIANCE WITH COMPETITION LAW

Suppliers must comply with their competition law obligations including the Australian Competition and Consumer Act 2010 and the New Zealand Commerce Act 1986. Suppliers must not engage in collusive and/or anti-competitive conduct or abuse a dominant position in a market.

Furthermore, Veolia expects its suppliers to adopt rigorous standards of conduct and negotiate honestly and fairly with Veolia in every respect. Accordingly, a supplier must freely determine its business and industrial policy, and its prices, without sharing any commercially sensitive information with competitors via any means or forum.

DATA PROTECTION AND INFORMATION SECURITY

Suppliers must take all reasonable steps to ensure that Veolia data (personal and commercial) to which they become privy in connection with their work for Veolia, is protected against unauthorised or unlawful processing, including any unlawful or accidental destruction, alteration, damage, loss, misuse, interference, disclosure of, or access (Data Breach).

An appropriate Incident Response Plan must be in place to ensure Veolia is notified within twelve (12) hours of any data compromise which has or may impact Veolia.

Veolia Data held in the infrastructure of a supplier, its subcontractors or personnel, must:

- be kept confidential and held in compliance with all applicable Privacy Laws
- be used only for the purpose for which it was disclosed
- be managed securely throughout its lifecycle, including storage, processing and transmission
- be returned to Veolia upon completion of the works for which it was needed and/or destroyed and all copies permanently erased from the Supplier's system and the systems of its subcontractors and personnel.

Veolia reserves the right to audit and pen test applications or systems that hold Veolia data. Supplier cooperation is required for all such audits and penetration tests.

Explicit approvals from Veolia must be sought for any changes to data sovereignty or the use of new technologies that were not approved as part of the initial offering, e.g. AI.

Any entity in possession of Veolia data must take all necessary steps to maintain the security of that data, including implementing security controls compliant with industry-leading security frameworks such as [ISO 27001](#), National Institute of Standards and Technology (NIST) and Australian Signals Directorate (ASD) [Essential Eight](#).

BUSINESS RESILIENCE

Continuity: Suppliers must maintain a documented business continuity management framework throughout the duration of any supply arrangement with Veolia. This framework must clearly describe actions taken to prevent, prepare, respond and recover from disruptive events that could impact supply to Veolia, including incident notification, communication and escalation protocols.

Suppliers must provide a business continuity plan for all goods, services and/or works supplied to Veolia. This plan must clearly identify process criticalities and dependencies, such as people, IT systems, assets, equipment and third party providers, and include impact assessments and mitigations for all risks. This includes risks posed by climate exposure.

Veolia may request further information on disaster recovery arrangements and timeframes for critical systems or supply. Suppliers are required to comply as far as reasonably possible with all such requests.

Dependency: Suppliers must ensure that they do not find themselves in a position of dependency with regard to the Veolia Group. Accordingly, it is the suppliers duty to inform Veolia if our spend exceeds 30% of their total revenue. Veolia reserves the right to request suppliers to facilitate a dependency check if over reliance is suspected by our buyers. Mitigations must be agreed and implemented if dependency is found.

DIGITISATION

Veolia has migrated to the SAP Ariba platform for all purchase-to-pay activities. This choice will streamline our end to end purchase-to-pay process to simplify our trading activities and strengthen our supply chain.

Veolia seeks to partner with suppliers who share our vision for a seamless, digitised purchase to pay experience. Veolia requires all suppliers to register with SAP Ariba and support the transition to digital invoicing.

PAYMENT TERMS

Unless otherwise regulated by law, suppliers will abide by Veolia's payment terms.

Where the place of delivery is Australia:

- 30 days from the date of invoice for an eligible business,* otherwise;
- 60 days from the date of invoice.

* An eligible business is an individual, partnership, company or trust that has an aggregated turnover of less than \$10 million per year; or, a 51%+ Aboriginal and/or Torres Strait Islander owned and controlled entity.

Where the place of delivery is New Zealand:

- 40 days from the date of invoice.

REGULAR ASSESSMENT

Veolia reserves the right to carry out regular assessments of our supplier's compliance with this code, including self assessment questionnaires, site visits, audits or ad hoc requests for information. These assessments are built into our supplier evaluation, onboarding and performance management processes. Supplier cooperation is required for all these requests.

Veolia expects all suppliers to:

- Respond in full and be open and honest in response to any requests for information.
- Self-monitor their compliance with this Code and to inform us of any non-compliance.
- Facilitate all desktop or on-site audits conducted by Veolia, its representatives, or third parties.
- Adhere to agreed mitigation measures and improvements following due diligence assessments.
- Complete an improvement plan to address any breaches or shortcomings disclosed or identified.

Additionally, we expect our suppliers to be prepared to discuss, in good faith, participation in Environmental and Social Governance (ESG) evaluations and decarbonisation programs conducted by entities such as SBTi and Ecovadis, or others, as required by Veolia Group.

Any or all of the requirements outlined in this code may be enshrined in contractual clauses between the supplier and Veolia. Supplier performance is subject to quarterly review.

Failure to meet our minimum standards may result in the termination of the supply arrangement at Veolia's discretion subject to contractual obligations.

REFERENCE TEXTS AND WEB PAGES

VEOLIA AUSTRALIA AND NEW ZEALAND	VEOLIA ENVIRONMENT
<u>Green Up - About our Strategy</u> Our collective action will accelerate ecological transformation.	<u>Anti-Corruption Code of Conduct</u> Read about our non-negotiable base of values and adhere to them at all times.
<u>Reconciliation Actions</u> Reconciliation is a tapestry woven from multiple threads.	<u>Our Publications</u> Read about our progress towards our ESG targets and consider your contribution.
<u>Supplier Page</u> This page explains how Veolia works with its suppliers.	<u>Our Purpose</u> Read about our purpose and understand your part in it.

