

This Policy reflects the commitments the Citadel group of companies makes in respect of its sourcing and supply chain. It was developed with reference to Citadel's Vision and Values, and draws upon international standards on labour activities.

This Policy is a part of Citadel's overall environmental, social and governance framework that includes its Code of Conduct, Bribery, Corruption, Gifts and Hospitality Policy, and its Procurement Policy. It is implemented in conjunction with its Supplier Code of Conduct and Modern Slavery Act activities. If suppliers are unable to comply with this policy or the Supplier Code of Conduct, then Citadel may choose not to deal with them, or to terminate existing arrangements.

BRIBERY & CORRUPTION

Bribery and corruption is not tolerated at Citadel. 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. Citadel has clear expectations from its suppliers on the management of conflicts of interest.

LABOUR AND HUMAN RIGHTS

Citadel believes that all workers in its supply chain deserve to be treated with dignity and respect. Suppliers are expected to provide a fair and ethical workplace, which upholds high standards of human rights and integrates appropriate labour and human rights policies and practices into its business.

INVOLUNTARY AND UNDERAGE LABOUR

Employment is a choice that should be made freely, and not from fear of any penalty.

There is no place in Citadel's supply chain for prison or forced labour, bonded labour, indentured labour or debt bondage, or other forms of compulsory labour. Workers in Citadel's supply chain should not be required to hand over identity documents, or to pay for recruitment or other services to their employers or intermediaries, and must be entitled to leave their positions without penalty after reasonable notice.

Workers in Citadel's supply chain must be of the minimum legal age in their country of employment, and irrespective of that age threshold, Suppliers must not use employees under the age of 18 in night work, or work that is of its nature, or its conduct, likely to harm the health and safety of that person.

The use of child labour in Citadel's supply chain is prohibited and if children are found to be working directly or indirectly for a Supplier, Citadel may require the Supplier to implement a solution that works in the best interests of the child. Citadel is aware that not all work done by children is child labour, and will have regard to the nature of the work, its effect on the child, their health and wellbeing, and their education.

ANTI-DISCRIMINATION

Suppliers are expected not to discriminate against any worker based on age, disability, ethnicity, gender, marital status, political affiliation, race, religion, sexual orientation, gender identity, union membership, or any other status protected by law, in hiring, remuneration, and other employment practices.

ANTI-HARASSMENT

Citadel is committed to a workplace free from workplace bullying, harassment, victimisation and abuse. Suppliers are expected not to bully or threaten workers, or subject them to unlawful or inhumane treatment. Harassment includes verbal, physical, sexual or psychological abuse.

WORKING CONDITIONS

Citadel expects all Suppliers to comply with all applicable laws and regulations with respect to wages, working hours (including breaks), and workers compensation insurance, and ensure that all their workers receive their legally mandated minimum wages, benefits, superannuation, leave entitlements and time off for legally recognised holidays. Workers are entitled to written information about the conditions of their employment and the calculation of their pay.

Payment of wages and other remuneration must be made in a timely fashion, and always in compliance with local laws. Wage deductions should not be made if their effect is to penalise or discipline a worker.

All overtime is expected to be reasonable and paid at the rate and in accordance with applicable local laws.

FREEDOM OF ASSOCIATION

All workers have the right to join or form trade unions and Citadel's Suppliers are expected to freely allow workers to associate with others, form and join (or refrain from joining) industrial organisations or associations of their choice and bargain collectively, or engage in any lawful industrial activity without interference, discrimination, retaliation or harassment.

WORK HEALTH AND SAFETY

Suppliers must provide their workers with a safe and hygienic working environment that is appropriate for the industry and hazards of the work being done.

All buildings under the control of a Supplier that house workers (while working or otherwise) must comply with local building and fire safety standards (and as a minimum should have access to potable water and sanitary facilities).

All equipment used in the workplace must meet or exceed local legal safety requirements. Suppliers must take adequate steps to prevent workplace accidents and injuries and appoint a suitably senior person in their organisation to take responsibility for worker health and safety.

ENVIRONMENTAL MANAGEMENT

Citadel is committed to promoting environmental responsibility and seeks to understand its overall environmental footprint.

Suppliers are expected to minimise the environmental impact of their operations and maintain environmentally responsible policies and practices.

ENVIRONMENTAL IMPACTS

Key divisions within Citadel already operate a closed loop for customers, whereby all packaging of goods sold and delivered is recycled, and where Citadel provides managed services, equipment that is end-of life is disposed of through appropriate mineral recycling programs. . Citadel's corporate operations all involve recycling programs for office waste.

Suppliers must comply with all applicable laws and regulations relating to the environment, including any management and reporting obligations.

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

- ensuring the safe storage, transportation and disposal of hazardous substances including hazardous waste;
- maintaining policies and practices for the efficient use of energy, water and natural resource consumption; and
- maintaining policies and practices that reduce the risk of pollution, loss of biodiversity, deforestation, damage to ecosystems and greenhouse gas emissions.

This policy was adopted by the Board on 23 July 2021.