

Toll Group

# Supplier Code of Practice



# Welcome

## Dear Supplier

Welcome to Toll! We are pleased to partner with you. Your goods and services play an important role in Toll being able to fulfil our purpose – *to move the businesses that move the world, and contribute to our success.*

We look forward to building a long and successful partnership with you.

To start, we'd like to introduce you to our Supplier Code of Practice (Code).

The Code clearly outlines our company standards and the way we choose to do business, whatever we do and wherever we are. It sets out the behaviours we expect of our suppliers when working with Toll, acting on our behalf and/or supplying us with products and services.

As a global company, we comply with all applicable laws and regulations. Operating with integrity is everyone's responsibility.

At Toll, our success comes not only from what we do but how we do it.

Our strong values guide us in all our endeavors. Every aspect of our business is aligned with these values, ensuring that our actions consistently reflect our commitment to upholding these values.

These are outlined in Our Toll Way – set out on the next page – which contains our purpose, mission, vision, core beliefs and values.



**Alan Beacham**  
Managing Director, Toll Group

# Understanding Our Toll Way



Building on our Australian heritage, the lotus flower reflects our Asian parentage and is a symbol of rebirth, resilience and strength.

Our Toll Way brings together our Values, purpose, strategic priorities and culture compass. It's the common thread that connects over 16,000 team members across 500 sites in 27 countries. It helps guide our decisions and actions to make sure that we all work together to deliver the best possible solutions for our customers. We know that good businesses are built on a clear purpose and strong values that are deeply embedded and guide the right behaviours.

TOLL

## Our Purpose is our north star



We move the businesses that move the world.

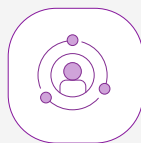
It's an important purpose that describes the vital role in our global communities, from delivering fuel and medicine, to a birthday package, and everything in between. While we help businesses make big moves everyday, we never forget how much the little things matter and our crucial role in their success.

## Our Values guide how we deliver on our purpose



Our Values were shaped with input from our people, capturing what we wanted to preserve and what we wanted to change at Toll.

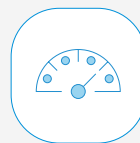
And they are relevant for every Toll team member, regardless of division, role or location. We wanted to continue to create an accountability and performance-driven culture; teamwork and a strong customer focus will drive this.



CUSTOMER



TEAMWORK



PROGRESS



ACCOUNTABILITY



INTEGRITY

## Our strategy for growth



As our business starts its journey toward simplification, our frameworks have been simplified into one graphic.



CARE

Care for our people, plant and communities



COMPETE

Smarter working so we're fit for growth



GROW

Growth with customers through outstanding customer solutions

## Why does Toll have a Supplier Code of Practice?

Toll Supplier Code of Practice sets out minimum requirements for our suppliers to operate in accordance with responsible business principles detailed in this Code and in full compliance with all applicable laws and regulations. We expect all of our suppliers, including subcontractors, agents and non-controlled JVs doing business with or on behalf of Toll, to adhere to the same ethical standards.

This Code reflects our commitment to the United Nations Global Compact (UNGC) and our respect for universally recognised normative standards such as the United Nations Universal Declaration of Human Rights, ISO standards on HSE and the core labour conventions of the International Labour Organisation (ILO).

Our suppliers are also required to implement the principles and standards of this Code or similar internationally recognised standards to their own business partners, including suppliers, contractors and joint venture partners.



Where the standards in this Code differ from local and national laws as well as international standards, we expect our suppliers to apply the stricter standard.

This Code reflects our core beliefs and business values, we wish all employees and business partners to follow when operating on our behalf. Hence, we expect full transparency across our supply chain including in relation to any activities conducted on our behalf by our suppliers. We, therefore, reserve the right to audit you and your operations to ensure strict adherence to this Code and continuous improvement when required.

Failure to comply with this Code may lead to serious legal, financial, or reputational repercussions for you and Toll. Hence, unless ending our relationship becomes necessary, we will always try to suggest the best approach to remediate any breaches to this Code or concerns.

## How do I live the Code?

By agreeing to be a supplier to Toll, you agree to abide by the Code. While you may have an individual agreement to work with Toll, our Code applies to all our suppliers and contractors.

We expect you to comply with your agreement with Toll, this Code, and all laws and regulations that apply to you in your capacity as a supplier to Toll. Where applicable laws and this Code deal with the same issues, you should follow the one with the higher standard.

## What if I do not follow the Code?

As a supplier to Toll, you are required to follow this Code including, if necessary, to change the way you do things so that you comply with it when you provide a service to Toll. Your failure to comply with this Code can have significant legal consequences for Toll. Therefore, we expect you to notify us immediately if you become aware of any conduct by you or your business which is in breach of the Code.

We take this Code very seriously and choose suppliers who can show us they support and will comply with it. We will also check that you are following this Code before renewing your contract.

If you do not follow this Code, we will take whatever action we consider appropriate, which may include ending our relationship with you.

## Reporting concerns

We expect our suppliers to have a reporting mechanism to ensure that employees can report concerns or grievances anonymously if they wish to and without fear of any form of retaliation against them. All grievances should be investigated in a fair and timely manner. We also welcome concerns from anyone within or outside of Toll if they suspect or know of any potential or actual violations of this Code. We do not tolerate retaliation against persons making reports in good faith. You can report concerns through the channel you are most comfortable with, such as Toll Eligible Recipients as prescribed by Australian law, including members of Toll's Global Leadership Team, Global Head of Compliance, Head of Security or through the Toll Group Disclosure Hotline.

## Toll Group Disclosure Hotline

Make a report online (available in multiple languages from any location) and/or see the complete list of country telephone numbers at: Page 20 of this Code and at [www.tollgroup.ethicspoint.com](http://www.tollgroup.ethicspoint.com)

If you would like more information about our policies, full policies can be obtained from your Toll contact and some are available on Toll's website at [tollgroup.com/about/policies-procedures](http://tollgroup.com/about/policies-procedures).



## How we do business

The policies in this section help us achieve success in an ethical and fair way.

### Bribery and Corruption

Toll's policies are very clear: we do not pay or receive bribes, kickbacks, or facilitation payments to or from anyone and neither should you. You should also never offer, solicit or accept a payment, gift, or anything else intended to influence what, or how you provide services to Toll – even in places where you believe this behaviour is considered culturally acceptable. This includes making payments to speed up government action (sometimes known as facilitation or grease payments), to land a business deal, or to bribe Toll employees during tenders. You should always be able to back up all your business dealings with accurate, honest, and transparent record-keeping.

## Data protection, information security and disclosure of information

Suppliers should adhere to data privacy laws and comply with contractual requirements, including applicable Toll policies, on confidentiality and information security.

Ensure collection and further processing of employees' personal data is undertaken in compliance with Toll's Privacy and other related policies, applicable data privacy legislation and best industry practices.



## Competition

In line with our values we expect you to always compete fairly and honestly. This includes observing anti-trust and competition laws. It means you should offer goods and services on fair terms and never do anything illegal to reduce competition, such as fixing prices, disclosing information about tenders or showing favour to anyone at Toll's expense.

## Our approach to sustainability

At Toll we believe that sustainability is not merely an obligation but an opportunity to create long-term value for our stakeholders, while safeguarding the planet and society for future generations.

Our success is measured not only in financial terms – how we achieve our success is equally important.

Toll is committed to fair and sustainable business practices that benefit all partners. We choose to partner with suppliers who are aligned with our sustainability vision and objectives and comply with local and national laws.



## Conflicts of Interest

Conflicts of Interest is any personal or financial interest, any business, partnership, personal activity or relationship, prior or current employment, or any obligation that may interfere with the ability to objectively perform job duties and responsibilities or impair independence and objectivity. Such conflict-of-interest situations include critical relationships such as a relationship by blood or marriage, partnership, participation or an investment in business partners or competitors. The supplier shall immediately disclose any actual or potential conflict of interest related to its activities with Toll. We also expect you to notify us if you become aware of any conflict of interest related to Toll.



## Health and Safety

At Toll, we are Safety Obsessed and believe that everybody deserves to return home safely every day. This belief also applies to you and your workers while providing services to Toll.

We expect you to be able to show us that your work environment is safe and that you:

- Comply with all health and safety laws and regulations ensuring, in particular, that you fulfill your legal duty to ensure work is carried out safely without risk to employees, other workers and the public through providing:
  - Competent and adequately supervised workers
  - Well-maintained and suitable equipment and facilities
- Have relevant risk assessments and safe work procedures in place and your staff are thoroughly trained in these procedures.
- Comply with all health and safety standards, processes and practices as required by Toll or Toll's customers if you are on their site.

## Corporate Security and Crisis Management

Toll is committed to providing a safe and secure working environment for employees, customers and visitors to our facilities. We expect you to be able to show us that you have the appropriate security controls in place and these controls align to Toll's operating standards.

Toll's Critical Incident Management and Business Continuity program defines team structures, processes and resources that Toll will deploy in response to critical incidents which includes site emergency response plans.

You must ensure that you and your workers:

- Comply with Toll Security Policies
- Comply with all security regulations applicable to the jurisdictions in which you are providing services.
- Comply with our customers' security requirements
- Notify us if you become aware that these requirements are unable to be met.



This includes:

- Conducting background screening of your employees.
- Ensuring that your workers comply with Toll Security Policies, Standards, processes and practices while visiting Toll sites.



## Intellectual Property

Intellectual property includes, but is not limited to, know-how, ideas, or ways of working that have been created for, and belong to, a particular company. Where applicable, any use by you of Toll's intellectual property (such as trade information, copyrights, and trademarks) can only be used as contracted, you must keep it confidential, and you are not to share Toll's intellectual property with others unless you have our prior written approval to do so. Once your engagement with Toll ends, you are to return all of Toll's intellectual property and stop using it unless you have a specific prior written agreement which states otherwise.

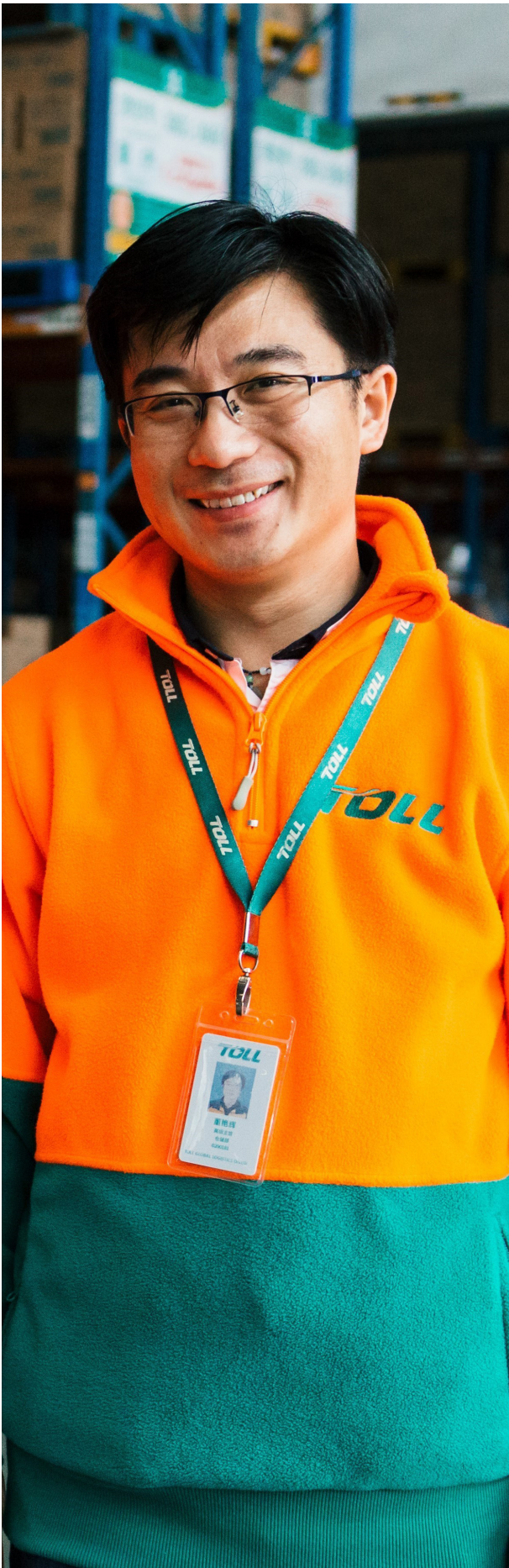
Unless you have the appropriate authorisation to do so, you should also not use any other party's intellectual property when providing services to Toll.



## Trade Controls

While you work with us, we expect you to comply with any applicable national and international foreign trade controls regulations pertaining to business transactions with countries, companies and persons (sanctions), and the transfer of goods and services, software or technology between countries (export controls).





## Our people

The policies in this section outline how we expect you to treat your employees.

### Workplace Behaviours

We believe everyone has the right to be treated well at work, so we have set minimum behaviour standards that apply across Toll. As a supplier, we require you to follow these minimum standards whenever you are in a Toll workplace and also in your own workplace. You and everyone you work with must do the following when representing Toll as a supplier:

- Comply with workplace laws and regulations as well as our standards.
- Create and maintain an environment in which all employees and suppliers are treated with dignity and respect. We expect you to have a workplace that does not tolerate violence, sexual, verbal, or psychological harassment or abuse or threats of such conduct.
- Report your concerns if you see behaviour in the Toll workplace that is inconsistent with these values.

## Equal Opportunities and Managing Diversity

We expect you to value and encourage people you work with by treating them fairly and with respect. Do not discriminate against anyone because of their physical attributes, nationality, culture, preferences, beliefs or personal circumstances. This includes discrimination against people when you recruit, promote, train, transfer, engage or terminate them.



## Personal Relationships

Personal relationships should not interfere, or be perceived to interfere, with your work for Toll. If you are in a personal relationship with someone connected to Toll, either an employee or another supplier, take whatever steps are reasonably possible to avoid any bias or conflict of interest and tell your Toll contact about the relationship as soon as possible to enable us to assist in managing any conflicted decision-making.

## Travel and Expenses

Our travel and expense policies are designed to keep costs down and to minimise traveller risk. If you need to book or undertake business travel on Toll's behalf, you are expected to abide by our policies. You should therefore speak to your contact at Toll to get a copy, read and follow the Toll Group Travel Management Policy and the Toll Employee Expense Management Policy.





## Drugs and Alcohol

Presenting fit for work every day means being free from fatigue, physical or psychological impairment which may impact your ability to work safely, including not being under the influence of drugs or alcohol.

You must make sure that neither you nor anyone who works with you misuses drugs or alcohol at work or attends a Toll site adversely affected by either drugs or alcohol. When onsite, you must always comply with the policies in place at the relevant Toll site.

If you see someone who you believe is under the influence of drugs or alcohol or who is putting the safety of others at risk on a Toll site or a Toll customer, you must immediately notify the site manager.

## Privacy

We expect you to value the privacy of people who work with you. Use personal information only in accordance with Toll's applicable policies, and only for the purposes it is obtained., Protect personal information, keep it only as long as you need it, and allow people to see, and correct any information you have about

them. Our privacy requirements apply to your people, our people and includes any personal information you come into contact while providing services to Toll.

## Ethical Labour Practices

Toll respects the rights and interests of the communities in which we operate and the individuals with whom we interact and complies with employment, anti-human trafficking and modern slavery laws in every country in which we operate. We strive to demonstrate the highest ethical principles in relation to how we treat our people. We expect you to comply with all employment laws. You must:

- Operate safe and hygienic workplaces
- Offer good working conditions which comply with all applicable local laws and mandatory industry standards regarding working hours, including overtime, rest breaks and paid vacation.
- Not employ workers below the age of 15 years or the locally applicable minimum legal age, whichever is more stringent. Ensure that employees, including trainees, under the age of 18 do

not undertake night-shift work or work overtime or carry out work that is hazardous or harmful to their physical or mental development.

- Not use any form of forced, bonded, compulsory labor or modern forms of slavery. All labor must be voluntary. Workers must be allowed to maintain control over their identification documents (e.g. passports, work permits or any other personal legal documents). The supplier shall ensure that workers do not pay fees or make any payment connected to obtaining employment throughout the hiring process and the employment period. The supplier shall be responsible for payment of all fees and expenses (e.g.

licenses and levies) relating to workers, where legally required. Punishment, mental and/or physical coercion as well as any other form of human trafficking are prohibited. Disciplinary policies and procedures shall be clearly defined and communicated to the workers.

- Only employ people who have a legal right to work in your country
- Endeavour to compensate both male and female employees on the principle of equal pay for equal work
- Recognise that everyone has the right to be, or not to be, a member of or represented by a union, and can choose to take part in lawful and peaceful gatherings.



## External relationships

The policies in this section deal with relationships with third parties.

### Gifts, Entertainment and Hospitality

You should never give or receive any gift, entertainment or hospitality that is intended to influence decisions made on behalf of Toll – either by you or any other Toll employee or supplier. We know gifts and entertainment are sometimes offered out of goodwill or to express thanks, and you should give or accept them only if they are modest and nothing is expected in return. Toll strictly prohibits offering or providing gifts, entertainment, or lavish hospitality to government officials.

### Political Donations

Never support or donate to a political party on Toll's behalf. If your work with Toll in any way relates to the provision of services to any government bodies, government officials or political parties, we also expect you to not make any political donations of your own or participate in any political activities. If you have any doubts about this, you should speak with your Toll contact.

### Social Investments including Charitable Donations

We sometimes support charities or worthy causes, but we do not expect anything from them in return. You should never provide any support or resources to any charitable organisation on Toll's behalf without our prior written approval.



## Communications

The policies in this section deal with how we communicate within and outside Toll.

### Communicating with the Media

It is important to manage Toll's reputation with the media and in other public forums to ensure Toll is fairly represented in news stories and influence how we are perceived by the general public.

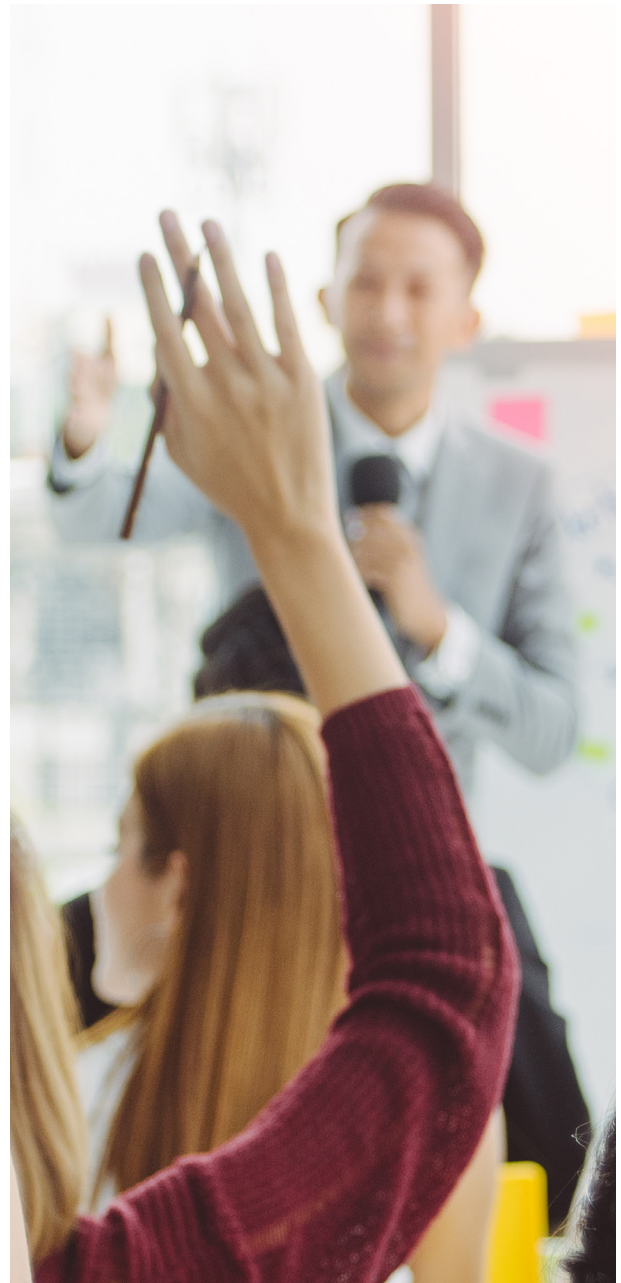
Toll is responsible to its many stakeholders worldwide, including our employees, governments and the communities in which we operate. To ensure we uphold these responsibilities, Toll's public statements on any issue are only ever made by approved company spokespeople.

If you are approached by anyone to make a comment politely decline to comment and refer the media outlet or journalist to Toll Media at [media@tollgroup.com](mailto:media@tollgroup.com). This applies to all outlets, including trade magazines, local and national radio, TV and newspapers. If you are using a media outlet to promote your relationship with Toll, you need prior written approval from our Corporate Affairs & Marketing team before you proceed.

## Social Media

You are responsible for what you publish in social media. If you use social media to comment on Toll, state clearly that you are expressing your own views, be respectful, and don't ever comment on our behalf or present yourself as a spokesperson for Toll. Equally, if you are using social media to promote your relationship with Toll, our Corporate Affairs & Marketing team needs to approve this first.





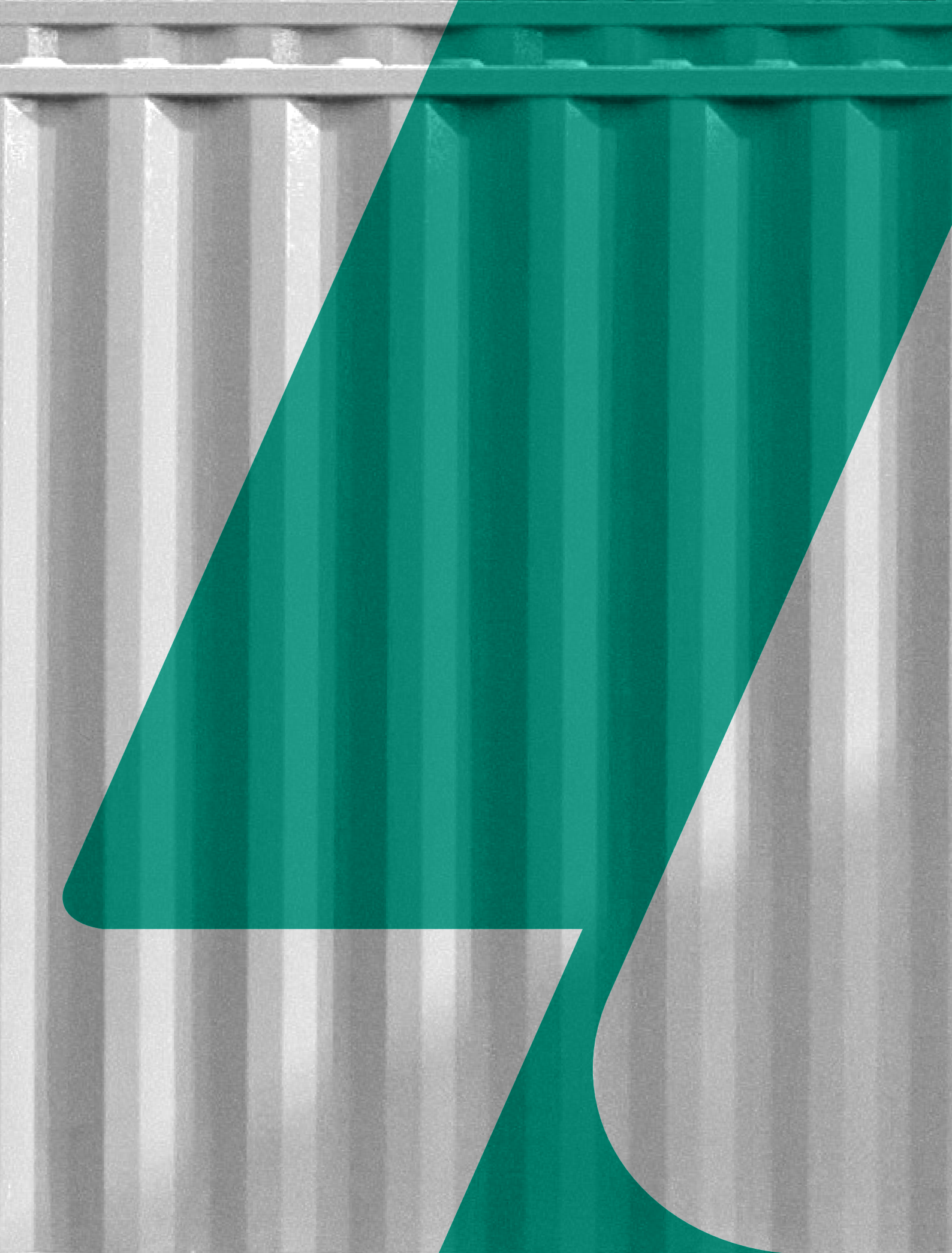
## Any questions?

If you wish to discuss any part of this Code, talk to your contact at Toll in the first instance. If you have a concern or would like to report a breach, contact the Toll Disclosure Hotline.



**TOLL GROUP DISCLOSURE HOTLINE**

Australia	1800 961 317
China	4008 201 809
Denmark	8083 0071
Finland	0800 413 612
France	0801 13 02 16
Germany	0800 189 9361
Hong Kong	800 902 567
India	00080008 20146
Indonesia	021 30943378
Ireland	1800 458 063
Italy	0800 194 753
Japan	00531 11 0347
Malaysia	0180 081 1281
Netherlands	0800 022 9459
New Zealand	0800 454 759
Singapore	800 492 2314
South Africa	080 001 0371
South Korea	744996
Sri Lanka	072 026 1817
Sweden	020 1090389
Taiwan	801 492 231
Thailand	1800 018 354
UAE	800 012 0529
UK	0800 086 9858
US	855 831 9876
Vietnam	024 5678 8505



For more information visit:

[www.tollgroup.com](http://www.tollgroup.com)

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