



# SUSTAINABILITY AND BUSINESS CONDUCT – MINIMUM SUPPLIER REQUIREMENTS

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At South32 the relationship we forge with our Suppliers is fundamental to how we achieve our objectives. We aim to only work with Suppliers who have strong values and standards of conduct and share our commitment to lawful business practices.

Read South32's Code of Business Conduct ("**Code**") to learn more about our:

- Purpose
- Values of Care, Trust, Together and Excellence
- Conduct standards

We expect our Suppliers to follow our Code, or their own Code provided their standards of conduct are consistent with ours. Our global Speak Up Policy, or whistle-blower policy, is also contained at section 18 of our Code. We encourage our Suppliers to Speak Up when our Values and standards are not being followed.

The latest version of our Code is available in multiple languages on South32's 'Code of Business' website [here](#), or from the 'Supplier' section of South32's website [here](#).

You can find a direct link to our Code here >

[English version](#) [Spanish version](#) [Portuguese version](#) [Simplified Chinese version](#)

South32's emphasis on continuous improvement has driven the enhancement of our controls to identify, assess, mitigate and manage risk throughout our operations and across our, and our Suppliers', supply chains to ensure we are meeting all of our commitments.






We do this by establishing and maintaining relationships based on inclusion, transparency and integrity with all stakeholders; and we expect the same commitment from our Suppliers. South32 requires all who work with us, or on our behalf, to be transparent and trusted partners who continuously strive to improve the way we work, while also enhancing the way they deliver services as well as source and supply materials to South32.







Suppliers are encouraged to implement an effective management system to comply with the standards communicated in this document. At a high-level, an effective management system should:





- drive compliance with South32's specifications and requirements.
- demonstrate compliance with the Supplier's global and regional industry applicable laws and regulations, as well as create transparency of the Supplier's end-to-end supply chain.




We are dedicated to operating sustainably, transparently and responsibly, while creating value for our stakeholders and improving lives in the communities where we operate. As a result, we actively encourage our Suppliers to utilise South32's supporting tools and documents to provide risk transparency. Please refer to the Resource section at the end of this document for more helpful links.

On the following pages we will define the minimum requirements that we expect our Suppliers to understand and follow. Thank you for partnering with South32 to make a difference now and for the future, by meeting our expected conduct standards covered in our Code as well as the minimum requirements in this document.

COMPLIANCE		Requirements
	<b>Corruption, Fraud and Bribery</b>	<p>The Supplier must comply with all applicable:</p> <ul style="list-style-type: none"> <li>• anti-bribery and corruption laws; and</li> <li>• international trade laws and sanctions of the countries in which South32 conduct business.</li> </ul> <p>This includes the Supplier not engaging in illegal conduct such as fraud, theft, bribery (including not making facilitation payments), extortion or other corrupt conduct, as well as declaring to us any actual or potential conflict of interest to South32.</p> <p>These requirements are further clarified at sections 12, 13, 15 and 16 of our Code, and in our Anti-Bribery and Corruption Policy available here in <a href="#">English</a>, <a href="#">Spanish</a>, <a href="#">Portuguese</a> and <a href="#">Simplified Chinese</a>.</p>
	<b>Health, Safety, Environment and Community (HSEC)</b>	<p>The supplier must comply with South32's HSEC requirements relevant to work completed as part of the supply terms and conditions with South32.</p>
	<b>Laws and Regulations</b>	<p>The supplier must comply with the letter and, where it is clear, the intent of all laws and regulations relating to their business conduct. This includes understanding laws, regulations and international standards and sanctions relevant to their work and complying with legal requirements of the country where they are working.</p>
	<b>Cybersecurity and Data Protection</b>	<p>The supplier must</p> <ul style="list-style-type: none"> <li>• confirm that it manages cybersecurity, data protection, and privacy of personal information in accordance with applicable laws and regulations;</li> <li>• protect the confidentiality, integrity and availability of South32 data and systems; and</li> <li>• be able to demonstrate an ongoing commitment to managing cybersecurity and data protection risk.</li> </ul>
	<b>Conflict Minerals</b>	<p>A supplier that procures tin, tungsten, tantalum and/or gold must have functional policies and transparency measures to assure that products and components supplied are deemed free of tin, tungsten, tantalum and gold originating from conflict mineral sources and regions.</p>

COMMUNITY		REQUIREMENTS
	Community Interaction	<p>The supplier, and in turn its employees, must treat all members of the community, including Indigenous and Tribal Peoples, with dignity and respect.</p> <p>They must not impact on the health, safety or wellbeing of members of the community by engaging in activities such as threatening behaviour, violence, sexual exploitation or abuse, verbal or psychological harassment or abuse</p>
	Local Commitments	<p>As applicable, the supplier must comply with local requirements or as negotiated in the terms, including those related to:</p> <ul style="list-style-type: none"> <li>• rights of Indigenous and Tribal Peoples;</li> <li>• traditional customs and cultural heritage;</li> <li>• environmental areas;</li> <li>• public policy;</li> <li>• training and education.</li> </ul>
	Local Content	<p>We expect our suppliers to identify opportunities that incorporate local procurement and employment and, to the extent involving work conducted for or on behalf of South32, to coordinate engagement with local representatives at South32.</p>
	Security	<p>The supplier must ensure that any public or private security forces engaged manage security in a way that is lawful and respects fundamental freedoms and human rights of all stakeholders.</p>
ENVIRONMENT		Requirements
	Biofuels	<p>Biofuels must only be sourced from global companies that have policies or standards for the sustainable sourcing of biofuel components. That is, they demonstrate the biofuels are not sourced in conflict with agricultural, biodiversity or other environmental values and have a positive lifecycle greenhouse gas emission profile.</p>
	World Heritage listed properties and IUCN Protected Areas	<p>Materials must not be sourced from <u>World Heritage listed properties</u> or <u>International Union for Conservation of Nature protected areas.</u>; either directly or within the supplier's end-to-end supply chain.</p>

DECENT AND SAFE WORK		REQUIREMENTS
	<b>Child Labour</b>	Children must not be hired to work before completing their compulsory education (as determined by applicable local laws). Notwithstanding local requirements, the minimum age for entry into employment must not be younger than 15 years of age.
	<b>Modern Slavery</b>	The supplier must affirm that: <ul style="list-style-type: none"> <li>• there is no forced, bonded, or involuntary labour; or labour acquired through human trafficking.</li> <li>• they will work towards implementing a robust risk assessment process for its own supply chains to identify and mitigate against risks of modern slavery</li> </ul>
	<b>Freedom of Association</b>	The supplier must: <ul style="list-style-type: none"> <li>• adopt an open attitude towards the legitimate activities of trade unions;</li> <li>• workers' representatives must be allowed to carry out their legitimate representative functions in the workplace and must not be discriminated against.</li> </ul>
	<b>Workplace Health and Safety</b>	The supplier must provide: <ul style="list-style-type: none"> <li>• safe and healthy working facilities and appropriate precautionary measures to protect employees from work-related hazards and anticipated dangers in the workplace;</li> <li>• workers with regular and recorded health and safety training;</li> <li>• clean and safe accommodation that meets the basic needs of the workers (where provision is applicable).</li> </ul> The supplier must: <ul style="list-style-type: none"> <li>• follow all relevant legislation, regulations and directives in the countries in which the contract activities are undertaken to provide a safe and healthy workplace;</li> <li>• implement systems for the prevention of occupational injury and illness including standards for fire safety; emergency preparedness and response plans, COVID-19 management; occupational/industrial hygiene standards; appropriate lighting and ventilation; machinery safeguarding; reporting and investigation of occupational injuries and illness; reasonable access to potable water and sanitation facilities;</li> <li>• assign responsibility for health and safety to a management representative.</li> </ul>

DECENT AND SAFE WORK		REQUIREMENTS
	<p><b>Non-Discrimination and Diversity</b></p>	<p>The supplier must:</p> <ul style="list-style-type: none"> <li>• provide a work environment in which everyone is treated fairly and cultural, gender, ethnic, religious or other diversity factors such as disability are respected;</li> <li>• offer employment on the basis of merit;</li> <li>• not base decisions regarding employment on attributes unrelated to job performance (including but not limited to, race, colour, gender, religion, personal associations, national origin, age, disability, political beliefs, marital status, sexual orientation, and family responsibilities).</li> </ul> <p>In some cases, it is acceptable to apply positive discrimination targets to promote in country specific legislative requirements e.g. BBEE outcomes, indigenous or local employment and female participation. Decisions relating to suppliers, customers, contractors, and other stakeholders must also be based on merit.</p>
	<p><b>Wage, penalties and working hours</b></p>	<p>The supplier must ensure:</p> <ul style="list-style-type: none"> <li>• wages and benefits (including overtime) paid for a standard working week, must satisfy, at a minimum, national legal standards or local industry benchmarks;</li> </ul> <p><b>Note:</b> In nation states where no minimum wage legislation exists, the supplier must seek to establish a living wage that provides an adequate standard of living for all its employees and their dependents.</p> <ul style="list-style-type: none"> <li>• working hours do not exceed the national legal standards or local industry benchmarks, whichever provides greater protection for the worker;</li> <li>• performance-based pay systems are calculated based on reasonable expectations and be clearly defined and communicated.</li> <li>• they do not deduct allowances or withhold wages as a disciplinary measure or for any other reason that is not permitted by law.</li> </ul>
	<p><b>Treatment of employees</b></p>	<p>The supplier must create and maintain an environment that treats all employees with dignity and respect and must not use any threats of violence, sexual exploitation or abuse, verbal or psychological harassment or abuse.</p>

## SUPPLIER RESOURCES

RESOURCE	LINK
South32's Supplier Portal	<a href="https://www.south32.net/get-in-touch/suppliers">https://www.south32.net/get-in-touch/suppliers</a>
South32's Code of Business Conduct website	<a href="https://www.south32.net/who-we-are/our-approach/code-of-business-conduct">https://www.south32.net/who-we-are/our-approach/code-of-business-conduct</a>
South32's Speak Up website	<a href="https://www.south32.net/who-we-are/our-approach/speak-up">https://www.south32.net/who-we-are/our-approach/speak-up</a>
Direct link to our EthicsPoint Reporting Hotline ( <i>one option to use to report a business conduct concern</i> )	<a href="http://south32.ethicspoint.com">http://south32.ethicspoint.com</a>