

Supplier Code of Conduct

Introduction

We recognise that our actions today have lasting consequences for future generations. Wotton Kearney is committed to ethical, sustainable and socially responsible business practices. We expect the same high standards of our suppliers, contractors, consultants and business partners (**Suppliers**).

This Supplier Code of Conduct (**Code**) sets out the minimum standards of ethical, social and environmental conduct Wotton Kearney expects of all Suppliers, both current and prospective. We encourage partnerships built on fairness, transparency and a shared commitment to sustainability.

Application of this Code of Conduct

This Code of Conduct applies when a Supplier provides goods or services to Wotton Kearney (to any office in any jurisdiction), regardless of the value.

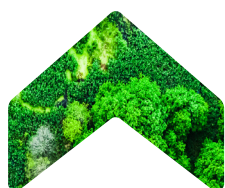
Suppliers must review the Code and ensure that their employees, subcontractors and third parties involved in providing goods or services to Wotton Kearney comply with this Code.

We also expect that Suppliers influence and encourage their own supply chain to meet the minimum standards set out in this Code.

Advancing Environmental Sustainability

Suppliers must:

- Maintain environmentally responsible policies and practices in their operations,
- Comply with laws and regulations relating to the protection of the environment,
- Minimise waste and maximise recycling of waste of all types,
- Actively work to minimise the environmental impacts of their operations, including reducing emissions and energy consumption.



Human Rights and Labour Standards

Human Rights

Suppliers are expected to support and respect the protection of internationally proclaimed human rights and ensure they are not complicit in human rights abuses.

Modern Slavery

Modern slavery breaches the most fundamental freedoms and human rights of individuals. Modern slavery describes serious exploitation including human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or service and child labour.

Wotton Kearney rejects all forms of modern slavery and recognises that modern slavery is never acceptable in any of its forms.

Suppliers must:

- Comply with all applicable laws and regulations relating to modern slavery,
- Take all reasonable steps to minimise and mitigate risks of modern slavery in their operations and supply chain.

Labour and employment conditions

Suppliers must:

- Provide a fair and ethical workplace free of discrimination, harassment, victimisation and abuse,
- Ensure working hours, wages and benefits meet or exceed legal and industry standards,
- Respect workers' rights to freedom of association and collective bargaining.

Health, Safety, and Wellbeing

Suppliers must:

- Provide a safe and healthy workplace in compliance with applicable health and safety laws,
- Take reasonable steps to protect workers' physical and mental wellbeing.

Social Responsibility

We encourage Suppliers to join us in building workplaces that are inclusive and respectful of all people, including by:

- Promoting diversity, equity and inclusion,
- Respecting the rights, cultures and heritage of Indigenous Peoples and local communities.

Ethical Leadership and Governance

Integrity, Ethics and Corporate Governance

We expect high standards of ethical conduct from our Suppliers and compliance with all applicable laws.

Suppliers must:

- Conduct business honestly, fairly and with integrity and have procedures in place to ensure their directors and employees do not engage in any anti-competitive behaviour,
- Maintain good corporate governance and risk management systems,
- Prohibit bribery, corruption, fraud, and extortion,
- Avoid and disclose actual or potential conflicts of interest.

Confidentiality, Data Protection, and Cybersecurity

We require all Suppliers to protect personal information in compliance with applicable privacy and data protection laws.

Suppliers must:

- Adopt high standards to protect confidential information, including client and firm data, during and after any engagement,
- Implement appropriate cybersecurity safeguards and promptly report any data breaches.

Ethical Use of Artificial Intelligence

Suppliers must ensure that all uses of artificial intelligence (AI) adhere to the highest ethical standards and comply with all applicable laws and regulations. The deployment of AI systems in connection with client data or firm matters requires prior, express, and written consent from WK.

Suppliers must:

- Ensure AI systems are transparent, fair, and do not result in discriminatory outcomes or bias,
- Maintain robust oversight and accountability for AI decision-making processes,
- Safeguard the privacy, confidentiality, and security of all data processed by AI systems,
- Promptly disclose and address any risks, adverse impacts, or concerns relating to the use of AI,
- Participate in audits or provide documentation as requested to demonstrate ethical AI practices and ongoing compliance.

Responsible Procurement and Supply Chains

Suppliers must:

- Cascade the requirements of this Code of Conduct to their own suppliers and business partners,
- Undertake due diligence to identify, prevent and mitigate modern slavery and human rights risks in their supply chains,
- Engage in remediation where adverse impacts are identified.

Grievance Mechanisms and Reporting Concerns

Suppliers must:

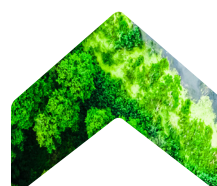
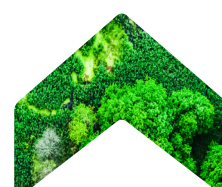
- Provide accessible grievance mechanisms for workers and stakeholders,
- Ensure that concerns can be raised safely and confidentially, without retaliation,
- Promptly notify Wotton Kearney of any actual or suspected breach of this Code of Conduct.

Wotton Kearney's [Modern Slavery Grievance Policy](#) has been adopted to make it easy for anyone to raise concerns about potential or actual modern slavery within our operations or supply chains. Suppliers, their staff or contractors or any other third party can lodge a grievance anonymously using [this form](#).

Monitoring Compliance

Wotton Kearney reserves the right to review and monitor compliance with this Supplier Code of Conduct.

Failure to comply with this Code may result in corrective action, suspension of work, or termination of the business relationship.



Australia

Adelaide

Level 1, 25 Grenfell Street
Adelaide, SA 5000
+61 8 8473 8000

Brisbane

Level 21, 71 Eagle Street
Brisbane, QLD 4000
+61 7 3236 8700

Canberra

Level 6, 121 Marcus Clarke Street
Canberra, ACT 2601
+61 2 5114 2300

Hobart

Level 6, Reserve Bank, 111 Macquarie Street
Hobart, TAS 7000
+61 3 6108 9000

Melbourne

Level 30, 500 Bourke Street
Melbourne, VIC 3000
+61 3 9604 7900

Perth

Level 49, 108 St Georges Terrace
Perth, WA 6000
+61 8 9222 6900

Sydney

Level 9, Grosvenor Place
225 George Street
Sydney, NSW 2000
+61 2 8273 9900

New Zealand

Auckland

Level 8, 21 Queen Street
Auckland 1010
+64 9 377 1854

Christchurch

203/237 High Street
Christchurch 8011
+64 3 667 4003

Wellington

Level 12, 342 Lambton Quay
Wellington 6011
+64 4 499 5589

Asia

Singapore

138 Market Street
05-01, CapitaGreen
Singapore, 048956
+65 6967 6460

Thailand

990 Abdulrahim Place
Unit 1710, 17th Floor, Rama 4 Road
Silom Sub-district, Bang Rak District
Bangkok 10500
+66 2460 7301

