

SUPPLIER CODE OF CONDUCT

for the Zip Group



Zip Co Limited ABN 50 139 546 428 and its subsidiaries (“**Zip Group**”) are committed to operating our business lawfully and ethically. We are committed to upholding all applicable laws regarding corporate social responsibility, workplace safety protection and staff inclusion and diversity. We expect our suppliers to do the same, including operating under all applicable modern slavery, labour and human rights laws.

Purpose of the Code

This Supplier Code of Conduct (“**Code**”) sets out our expectations for the conduct of our suppliers that relates to modern slavery, labour and human rights. A supplier is an entity or person that provides goods or services to us.

This Code reflects our support of International Labour Organization (“**ILO**”) standards.

Code of Conduct

From our suppliers, we expect compliance with applicable local laws and the principles outlined in our Code.

Compliance with applicable laws

Suppliers must comply with laws of the countries in which they operate.

Labour and Human Rights

We expect our suppliers to be committed to upholding the human rights of its workers in their operations and supply chains.

All work must be voluntary, and workers must be free to terminate their employment in accordance with an employment agreement provided in the workers native language. There shall be no unreasonable restrictions on workers freedom of movement including any restrictions on entering or exiting any company provided facility.

Suppliers shall not withhold, otherwise destroy or conceal or deny access to workers government issued identification documents, passports, work permits, travel documents, or the like, unless such holdings are expressly required by an applicable law.

Suppliers shall use all reasonable endeavours to ensure that third party recruitment agencies are compliant with the provisions of this Code. Workers shall not be required to pay employers or their agents’ any recruitment fees to obtain their employment. If any such fees are found to have been paid by workers, subsequent to the adoption of this Code by a Zip Group supplier, they must be repaid as soon as reasonably practicable, which will generally be understood to mean within 90 days of such discovery.

If applicable, suppliers are expected to exercise due diligence on relevant materials in their supply chains. Suppliers shall develop particular due diligence policies and management systems in order to identify applicable modern slavery risks and take appropriate actions to mitigate them.

Child Labour

Suppliers shall not employ workers who are under 15-years-old or the minimum age for employment in the country, whichever is greater. The supplier may provide legitimate workplace apprentice programs for educational benefit provided they are consistent with relevant International Labour Organization Standards.

Suppliers employing workers under the age of 18 must not require any such employee to perform work that may jeopardise their health or safety having particular regard to their age, maturity and ordinary life experience.

Working Hours

Supplier's workers hours shall not exceed the maximum set by applicable local laws which should align with International Labour Organization Standards.

Wages and Benefits

Compensation paid to workers of the Supplier shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates.

The Supplier shall communicate pay structure and pay periods to all workers in their native language. Wage deductions shall not be used as a disciplinary measure. All use of temporary and outsourced labour shall be within the limits of applicable local laws.

Humane Treatment

The Supplier agrees that there is to be no harsh and inhumane treatment including sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers; nor is there to be the threat of any such treatment under any circumstances whatsoever. Suppliers are to ensure that disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

Anti-Discrimination

The Supplier must comply with relevant discrimination laws and shall not discriminate against any worker based on age, disability, ethnicity, gender, marital status, national origin, political affiliation, race, religion, sexual orientation, or union membership in hiring and other employment practices such as promotions, rewards, and access to training.

Freedom of Association and Collective Bargaining

The Supplier shall respect the rights of all of its workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly, as well as giving corresponding respect to the right of workers to refrain from engaging in any such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management in their native language regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment.

Operational Principles

We expect our suppliers to take reasonably practicable steps to:

- implement the principles of this Code (which may include, where appropriate, due diligence on its own supply chains);
- identify, address and remedy potential breaches of applicable laws referred to in this Code;
- if it becomes aware that it has not conducted itself inconsistently with the principles of this Code, report this to us;
- influence its own supply chain to minimize and mitigate the modern slavery and support human and labour rights, this includes informing its workers and its supply chains of our Code.

Managing Breaches

In circumstances where we become aware that suppliers have not conducted themselves consistently with the principles of this Code, we may exercise a range of options available to us, which may include the right to terminate the arrangement (on a case-by-case basis). However, we are also committed to influencing and improving supply chains where breaches may have occurred.

Our oversight of our supply chain is set out in our Joint Modern Slavery Statement.

Grievance, Whistleblowing and Management

Subject to the governing jurisdiction, the Supplier shall have appropriate practices in place to ensure ongoing compliance with this Code and ensure that workers can make complaints and grievances without fear of disadvantage, intimidation or reprisal in accordance our Whistleblower Policy.

In addition to our investigation procedure under its Whistleblower Policy, the Supplier shall allow us to perform, to the extent reasonably practicable, periodic evaluations of its facilities and operations and shall to the extent reasonably practicable, allow us access to records of any grievance relating to modern slavery upon written request.