



QMS MEDIA PTY LTD
CODE OF CONDUCT **ETHICAL**
SOURCING

WHAT IS OUR CODE OF CONDUCT?

QMS Media Pty Ltd (**QMS**) is committed to achieving ethical performance and delivering value, without compromising our values and trusted reputation. QMS has enshrined this commitment in our Code of Conduct – Ethical Sourcing (**Code of Conduct**).

Our Code of Conduct complements our policies, employment contracts and of course relevant laws and government regulations. It is something that we regularly review to ensure that it is up to date and continues to effectively set expectations for good business conduct. However, no Code of Conduct can cover off every scenario and ethical issue that might arise. If you come across a situation that requires you to make a judgement call, we ask you to act in a way that upholds the law and the spirit of this Code of Conduct.

Do you think this is right?

- Is it legal?
- How does this situation measure up with QMS policies and this Code of Conduct?
- Would I be happy for my business to be publicly associated with this action?

What are the consequences?

- Is there a safety concern?
- Is this action putting someone at risk from a health and safety perspective?
- Does this risk causing harm to employees, colleagues or myself?
- Could this result in legal action?

QMS EXPECTATIONS

All suppliers, contractors, and consultants (for ease of reference we will refer to this whole group as '**suppliers**') that provide goods and services to QMS are expected to:

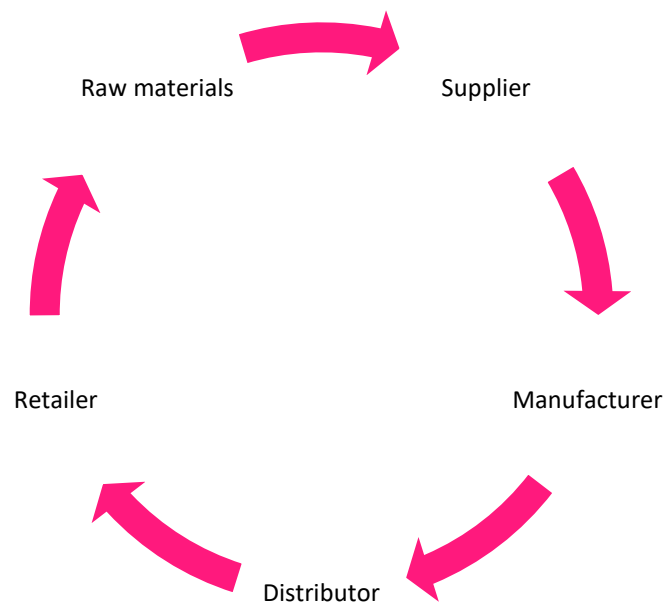
- adhere to the minimum standards of responsibility and ethical conduct set out in this Code of Conduct and at law;
- agree to comply with and be bound by this Code of Conduct (which forms part of your conditions of contract); and
- if requested, complete a Supplier Assurance Questionnaire which tells QMS a bit more about how you run your business to ensure that we are aligned.

QMS is committed to working collaboratively with suppliers to help achieve compliance with the Code of Conduct, where suppliers may not be able to currently meet the requirements but are open to improving practices within an agreed timeframe. However, QMS reserves the right to discontinue business, and/or elect to terminate any contract, that we have with non-complying suppliers.

OUR COMMITMENT TO ETHICAL SOURCING

QMS works to ensure free and fair competition between its suppliers based upon fair access to tenders, transparent and equal treatment of all suppliers and documented procedures. suppliers must not undertake anti-competitive practices.

To ensure that our products and services are sourced ethically and responsibly, we ask that suppliers consider their own processes (from raw material sourcing right up to distribution and customers).



MINIMUM STANDARDS

At a minimum, QMS expects its suppliers to comply with applicable local and national laws and regulations. Suppliers must also comply with the following minimum international standards:

Child Labour

All suppliers will comply with the minimum age limit defined by local laws.

Non-Discrimination

There must be no discrimination in employment or pay, access to promotions and training based on gender, caste, race, age, religion, disability, pregnancy, marital status, sexual orientation, political affiliation or union membership.

Forced Labour

QMS is committed to ensuring that human rights are respected, and that modern slavery or human trafficking is not taking place in our supply chain. All employment must be freely chosen.

Health and Safety at Work

- Right to safety in the workplace: All workers must be provided with a safe and hygienic work environment in accordance with local laws and industry hazards.
- Safety training: Any employer must undertake adequate steps to prevent accidents at work by taking all reasonable steps to reduce hazards in the workplace. All employees must receive adequate, training to perform their roles safely.
- Workplace injury and incidents: All incidents and injuries must be reported. All significant accidents and near misses must be investigated, reported and a corrective action performed to remedy the risk of re-occurrence and lessons learned shared with relevant personnel.
- Preparedness for emergencies: QMS expects that suppliers have identified any health and safety risks and have implemented procedures to prevent and respond to any events of emergency.

Wages and Leave Entitlements

Remuneration: All wages must be paid regularly and on time and must meet any local laws and/or industry practices.

Employment records: Employment records must be accurate and transparent.

Leave: Workers must be granted and correctly compensated for any types of paid leave to which they are legally entitled.

Permitted deductions: Any deductions from wages must only occur with the written permission of the employee (and employees must not be coerced into providing this permission).

Hours of Work

Overtime must be voluntary, reasonable and must be compensated in accordance with local employment law. Suppliers must ensure that the work hours/ week do not exceed 72 hours in any 7-day period and are inclusive of overtime.

Harassment and Bullying

All workers are to be treated with respect. There must be no harsh treatment including physical or sexual abuse, psychological or verbal harassment or intimidation.

The Environment

QMS aims to be a sustainable and environmentally compliant business and expects its suppliers to share in this commitment. This means that we expect that our suppliers will meet all local and national environmental legislative requirements at a minimum.

Ethics

QMS requires compliance by its suppliers with the ethical principles described below and with the QMS Media Group Code of Conduct (available online).

Conflict of interest: Suppliers are required to disclose any personal or financial interest linking them to an employee of QMS Media which may interfere/influence unbiased procurement of supplies/services.

Transparency: to ensure a high performing relationship built upon mutual trust, we ask our suppliers to be transparent and open with QMS about matters concerning the economic, financial or reputational situation of their business.

Intellectual property: Suppliers must ensure that they respect and safeguard the intellectual property of QMS. This includes by not reproducing images, designs or trademarks of QMS without the prior written consent of QMS.

Confidentiality

QMS is placed in a position of trust and regularly come across and are provided with sensitive and confidential information (some of which is personal information). The privacy of this information must be respected.

We consider confidential information to be information that is not available to the public and relates to the affairs of the business, employees, clients, members and suppliers.

Suppliers are required to manage and use any personal, sensitive or confidential information in their possession in accordance with all applicable privacy, data protection and intellectual property laws and regulations. This obligation continues even after the work you are doing for QMS ceases.

REVIEW OF CODE

This policy will be reviewed as required having regard to the changing circumstances of QMS Media to ensure continued compliance.

Developed: August 2021

Reviewed: July 2023