
Policy purpose and application

NORSTA Maritime Pty Ltd (NORSTA) is committed to fostering a culture of compliance, ethical behaviour and good corporate governance.

Our diverse network of suppliers is integral to the success of our business and we are committed to collaborating with suppliers who share our commitment to operating in a responsible, safe, resilient and sustainable manner.

This Supplier Code of Conduct (Code) sets out the behaviours and business practices we expect of our suppliers and complements the contractual arrangements we have in place. We expect that our suppliers communicate and, to the extent possible, apply these principles of the Code to their business.

Our Due Diligence

NORSTA conducts a pre-qualification process to ensure suppliers meet our required standards.

For the purposes of assurance and continuous improvement, we may assess supplier compliance with this Code by requesting relevant information, including but not limited to questionnaires, audits and other supporting documentation.

We may cease or choose not work with suppliers who do not comply with the requirements of the Code.

Health and Safety

NORSTA is committed to protecting the health and wellbeing of our people. Our most important measure of success is that every person who works with us remains safe and healthy at the end of each day.

We expect our suppliers to:

- comply with applicable health and safety laws, regulations and contract requirements;
- provide a safe working environment through proactive management and controls to minimise health and safety risks; and
- provide training to ensure their people have the skills required to work safely.

Environment

NORSTA is committed to the environmentally responsible management of our facilities and activities. We seek to minimise our impact to the environment and expect the same behaviour from our suppliers. We welcome innovative ideas to do things better.

We expect our suppliers to:

- comply with applicable environmental laws, regulations and contract requirements;

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- seek ways to minimise any adverse environmental impact across their operations including in relation to biodiversity, waste, water and emissions;
- take a proactive approach to managing environmental risks; and
- promote a culture of environmental awareness and responsibility.

Human Rights

NORSTA is committed to upholding the fundamental human rights of our employees, the communities in which we operate, those within our supply chains and other stakeholders impacted by our business. We expect our suppliers to:

- comply with applicable laws, regulations and contract requirements;
- promote a diverse, inclusive and safe workplace where people can undertake their duties free from discrimination and harassment;
- ensure fair remuneration and safe working conditions for all workers;
- respect freedom of association and collective bargaining, including a workers' right to lawfully and peacefully form or join a trade union of their choosing; and
- prohibit the use forced and compulsory labour by complying with the *Modern Slavery Act 2018*.

Community

NORSTA is committed to delivering a lasting, positive contribution to the regions where we operate. We expect our suppliers to act responsibly in their local communities. We value suppliers who:

- promote local job creation;
- promote local procurement;
- demonstrate they seek to actively recruit, train and employ Indigenous and disabled personnel; and
- demonstrate they seek to purchase from local Australian suppliers, disability enterprises and indigenous businesses.

Transparency, Integrity and Accountability

NORSTA is committed to fostering a culture of compliance and responsible business practices. Our commitment to ethical conduct is unwavering. We adopt a zero-tolerance approach to corruption and bribery, ensuring full compliance with legal and regulatory standards. We expect our suppliers to:

- comply with applicable laws, regulations and contract requirements;
- perform all business dealings honestly, transparently and fairly;
- ensure zero tolerance and not engage in business practices involving bribery, corruption or facilitation payments;
- disclose any real or perceived conflict of interest and obtain NORSTA's consent before proceeding;
- not offer or accept any gift/entertainment with the intent of, or perception of, obtaining improper advantage or influence for the supplier, NORSTA or its employees, or any third party;

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- not source goods or services on behalf of NORSTA from any country, entity or persons subject to international trade sanctions;
 - proactively report any concerns to NORSTA in a timely manner; and
 - conduct their business in line with fair competition.
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Privacy, Data Protection and Confidentiality

NORSTA is committed to upholding privacy and safeguarding data by ensuring all information is managed lawfully and appropriately. We expect our suppliers to:

- comply with applicable laws, regulations and contract requirements;
 - treat NORSTA data/information as confidential and use only for purposes of the contract;
 - apply adequate data/information privacy and security to protect NORSTA data from unauthorised access, use and disclosure; and
 - notify NORSTA immediately if the supplier becomes aware of a data/information breach.
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Media Contact

No engagement with the media about NORSTA or its activities should be undertaken unless agreed in advance through a review and approval process. You must always ensure that any communication about NORSTA, NORSTA's clients or our work together, including but not limited to: marketing materials, press releases, photos, social media posts or media interviews, is formally approved by NORSTA prior to publication.

Reporting and Notification

NORSTA encourages suppliers to report concerns or deviations relating to the Code including any illegal, unethical or improper conduct. Suppliers can raise matters or conduct of concern with the NORSTA Quality, Governance, and Risk Manager.

In general, the following steps will be undertaken:

- The issue will be escalated to senior management for investigation.
- Following the investigation and its review, an appropriate response and course of action will be determined in consultation with the supplier.

Where the non-compliance poses significant risk, external assistance and/or referral to relevant authorities may be considered.

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