

SUPPLIER CODE OF CONDUCT



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.

NORSTA's expectations of suppliers

NORSTA expects its suppliers to:

- Take the time to understand NORSTA's role and to demonstrate how their products and services directly support maritime sustainment outcomes and Commonwealth readiness.
- Share our commitment to performance excellence; consistently delivering safe, high-quality work, on time and at a competitive and transparent cost.
- Maintain sound financial health and continually improve affordability and efficiency through disciplined, lean and well-governed operations.
- Act as partners in improvement by sharing insights, lessons learned and better ways of working so that suppliers, NORSTA and our Commonwealth customers all benefit.
- Operate in a professional, respectful manner at all times, including on vessels, in shipyards and at NORSTA or Defence sites.
- Uphold ethical business practices that align with NORSTA's values and the standards expected of a Defence prime, including compliance with all applicable laws, regulations and contractual requirements.
- Look ahead with us, investing in skills, systems and technologies that will support future vessel classes, increased tasking and a resilient regional maritime industry.

Business ethics and conduct

NORSTA conducts its business fairly, impartially and in an ethical, transparent manner, and complies with all relevant laws, regulations and Commonwealth obligations. Integrity underpins all of our relationships, including those with suppliers. Suppliers are expected to:

- Avoid any activity or relationship that could create an actual, potential or perceived conflict of interest for NORSTA, the Commonwealth or their own organisation, and to declare such conflicts promptly where they arise.
- Never use their position, access or relationship with NORSTA for personal gain, and protect all confidential, commercial and Commonwealth information in line with contract and security requirements.
- Deal fairly and honestly in all transactions: quotations, tenders, variations, invoicing, reporting and day-to-day interactions and ensure records are accurate, complete and not misleading.
- Treat NORSTA personnel, Commonwealth representatives, other suppliers and members of the public with respect, free from bullying, harassment, discrimination or other unacceptable behaviour.
- Promptly raise any concern about illegal, improper or unethical conduct through the nominated NORSTA contact.

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;

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- 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;
- 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.

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:

- 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.

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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