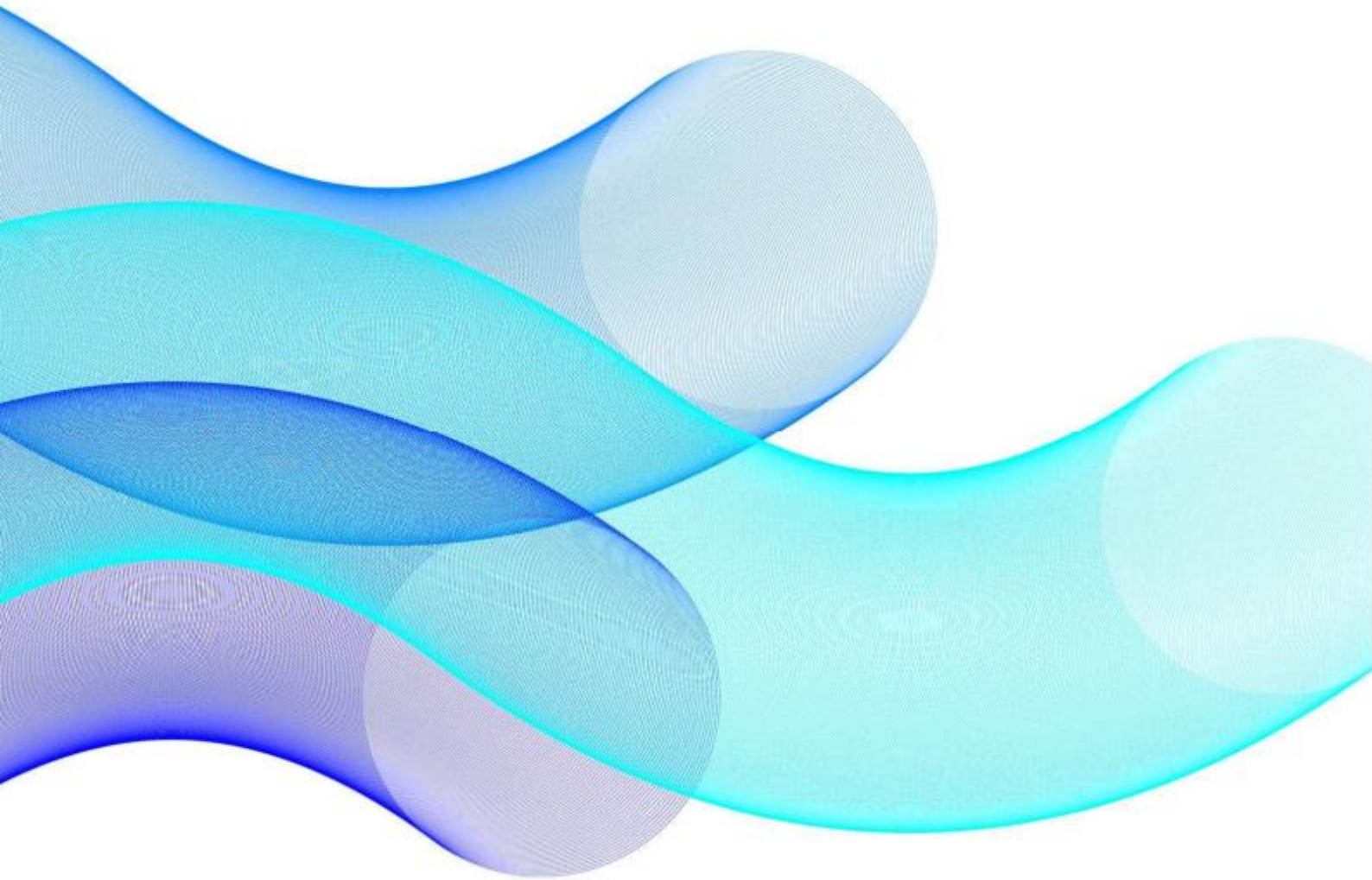

Supplier Code of Conduct

May 2025



Contents

INTRODUCTION.....3

COMPLIANCE WITH LAW AND ETHICAL AND FAIR BEHAVIOUR4

RISK MANAGEMENT4

PRINCIPLES5

1. HUMAN RIGHTS AND LABOUR PRACTISES.....5

2. HEALTH AND SAFETY5

3. ENVIRONMENT6

4. CYBER SECURITY.....6

5. SUPPLIER DIVERSITY7

6. RAISING CONCERNS7

7. POLICIES.....7

Introduction

Vocus is committed to ensure a high level of environmental, social and governance performance across its entire supply chain.

We are a business that expects our team members to behave ethically and fairly, and always act with integrity in their work.

Vocus regards our suppliers (including contractors and consultancies) as partners and appreciates their important role in enabling our success. We aim to develop strong supplier relationships that create long-term, sustainable value for our customers, shareholders, partners, and other stakeholders in the community.

This Code of Conduct supports Vocus in maintaining its core values and setting the minimum standards that we expect our suppliers will adhere to in working with us through providing products and services to Vocus.

Suppliers should be familiar with the Code and ensure that their business and supply chain meet these standards. Suppliers' ability to meet or exceed these standards will be taken into account by Vocus in making procurement and contract management decisions.

Compliance with law and ethical and fair behaviour

Suppliers must comply with all applicable law in Australia and any other countries in which they operate.

Vocus expects ethical and fair behaviour from its team members and expects suppliers to meet the same expectations at all times. This includes our suppliers:

- conducting business in a fair, honest and transparent way;
- maintaining full compliance with all applicable law, including in relation to anti-bribery and anti-corruption legislation, sanctions, export, re-export, import and related trade controls;
- respecting the intellectual property rights of Vocus and third parties;
- ensuring the highest level of confidentiality, data protection and privacy of Vocus and our customers' data;
- avoiding and disclosing any actual or potential conflicts of interest;
- exercising due diligence to reasonably ensure that materials and components used in their supply chain do not originate from regions linked to armed conflicts, and do not finance or benefit groups connected to human rights violations; and
- having a whistleblower policy and associated mechanisms available for their staff to report in a confidential manner any concerns or violations of this Code of Conduct.

Suppliers are responsible for ensuring their sub-suppliers, contractors and/or subcontractors to follow the principles of this Code of Conduct if they are directly providing products and services to Vocus.

Risk Management

Vocus has a strong risk management framework and expects its suppliers to take a proactive approach to mitigate and manage risks. The supplier is expected to maintain its own risk management system to manage compliance with this Code of Conduct.

Vocus reserves the right to evaluate the supplier's compliance to this Code of Conduct; and suppliers are expected to cooperate with Vocus in the assessment and mitigation of risks as required from time to time.

Principles

1. Human Rights and Labour practises

Vocus supports the protection of human rights as set forth in the International Bill of Human Rights, the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work and the United Nations Guiding Principles on Business and Human Rights.

We expect our suppliers to respect and actively work to protect the human rights of all people that are in any way impacted by their business activities, and to assist Vocus in managing its potential supply chain impacts.

Vocus expects suppliers will:

- not engage in or tolerate bullying, harassment, victimisation, abuse, or discrimination in any form, including based on ethnic origin, colour, sex, sexual orientation, language, religion or belief, political or other opinion, national or social origin, property, birth age, health status, disability or other status;
- promote diversity, inclusion and equality of opportunity and treatment across their operations and supply chains;
- provide fair remuneration and working conditions, including meeting minimum wage requirements, for all employees and workers;
- provide fair working hours, leave, rest periods and benefits as required by local law;
- respect workers' rights to freedom of association, collective bargaining, and peaceful assembly; • have written labour, workplace and health and safety policies that comply with all local laws;
- provide all workers with clear, written contracts outlining their wage and working conditions prior to them entering employment;
- ensure there is no child labour, or forced, bonded or compulsory labour within any part of their business operations or supply chain and that the organisation is in no way benefitting from. or contributing to. any type of modern slavery, as defined in the Modern Slavery Act 2018; and
- actively identify and manage any potential human rights issues as they arise.

In addition to complying to international human rights laws and norms as set out in the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work, suppliers must also manage their operations and supply chains in alignment with the UN Guiding Principles on Business and Human Rights and comply with Modern Slavery legislation in all applicable jurisdictions.

Vocus expects the supplier to fully adhere to and implement measures to ensure compliance to these principles at all times.

2. Health and Safety

Safety is everyone's responsibility. At Vocus, we demonstrate and promote a culture of care for ourselves, each other, and the environment.

Vocus acknowledges that our suppliers play a significant role in ensuring our commitment to keep each other, our people and the public safe.

All suppliers (including contractors) engaged by Vocus for the purpose of performing work or providing a service to Vocus are required to comply with Vocus WHS policy and the WHS Contractor Management Procedure made available to them at engagement.

All suppliers must provide a safe and healthy workplace and care for their workers (including subcontractors) and anyone that could be impacted by their activities by mitigating health, safety, and wellbeing risks as far as reasonably practicable.

Vocus is committed to and expects our suppliers to ensure they are:

- providing and maintaining a safe working environment for its team members;
- providing training, instruction, and supervision to enable employees to perform their work safely; • consulting with team members on health and safety matters;
- reporting and investigating incidents promptly;
- identifying, reporting, assessing, and controlling hazards and risks;
- ensuring health and safety information is provided to all workers, contractors, and visitors; and • establishing measurable objectives and targets to ensure continual improvement aimed at eliminating work-related injury and illness.

3. Environment

Vocus is committed to reducing our environmental impact and contributing to global efforts to limit climate change in line with the goals of the Paris Agreement. As such, we look to procure goods and services that help us to minimise our environmental footprint.

We look to our suppliers and partners to support us in achieving these goals by minimising the environmental impact of their products, services and operations, and supporting Vocus to identify and implement opportunities to limit its emissions. We also expect suppliers to provide environmental data, when requested, to assist with Vocus in reporting its Scope 3 emissions.

In particular, Vocus expects the supplier to:

- demonstrate compliance with all applicable environmental laws, regulations and relevant international standards;
- have an effective environment policy and environmental management system in place;
- take steps to minimise all greenhouse gas emissions; waste (including e-waste), and bio-diversity impacts;
- focus on sustainable production, transportation, operation, and effective waste management and recycling procedures;
- regularly monitor and report on its environmental objectives, targets, and performance; and • cooperate with Vocus on opportunities to:
 - improve the energy efficiency of our network infrastructure and facilities, and
 - optimise consumption by using energy-saving technology.

4. Cyber Security

We collaborate with our suppliers, building strong relationships founded on trust and respect, with a focus on making the Vocus network and premises safe and secure.

Our suppliers are expected to respect the privacy rights of their employees and all parties that they deal with and protect all data that they store or access. This includes complying with applicable privacy laws and regulations.

5. Supplier Diversity

We are committed to ensuring Vocus has a positive social impact. Achieving greater supplier diversity is key to this.

Vocus commits to growing supplier diversity by proactively engaging and supporting diverse suppliers wherever possible and providing diverse businesses the same opportunities as any other qualified supplier to win business with Vocus.

In line with our commitment to increase the diversity of our supply chain, Vocus also seeks to work with suppliers who promote diversity within their own operations and supply chains, in particular those who:

- have ambitious diversity targets in place and demonstrate strong female representation across their operations;
- have policies, targets and programs in place aimed at increasing Indigenous workforce participation; and
- engage social enterprises, disability enterprises and minority-owned organisations for the delivery of goods and services to Vocus.

6. Raising Concerns

Vocus's suppliers can confidentially report concerns about improper conduct and suspected violations of this Code in accordance with Vocus's Whistleblower Policy. This policy, which includes details on how to make a confidential report is available at: <https://www.vocus.com.au/about-vocus/social-impact/governance>

7. Policies

Vocus is committed to conducting our business in accordance with a sound corporate governance framework. Vocus' governance policies including its Code of Conduct, Whistleblower Policy, Risk Management Policy and Corporate Governance Statement are available at: <https://www.vocus.com.au/about-vocus/social-impact/governance>