



Supplier Code of Conduct

Strong relationships.
Shared responsibility.
Global impact.

01

Introduction

LPA Energy Group, including all business units (collectively, “LPA”), is committed to conducting business with the highest integrity and in compliance with the law.

As an industry leader and a responsible business, LPA seeks to use its position to promote our commitment to human rights, fair and safe labour practices, environmental protection and ethical business conduct.

As a supplier of products and/or services to LPA, your company (“Supplier”) is critical to LPA’s success. This Code sets out the minimum standards we require of the suppliers, contractors and service providers who work with us. It applies to each Supplier and to the Supplier’s own suppliers and subcontractors. We ask Suppliers to acknowledge this Code, comply with it, and take reasonable steps to ensure their own supply chains do the same.

The standards in this Code apply to all workers, including temporary, migrant, student, contract, direct employees and any other type of worker engaged by Supplier.

02

Legal Compliance

Supplier must comply with all applicable laws and regulations in every country in which it operates, including labour, workplace health and safety, environmental, anti-bribery, sanctions, customs and product-safety laws.

Where this Code sets a higher standard than local law, the higher standard applies.

03

Human Rights and Modern Slavery

Supplier must respect the human rights of its workers. Supplier must not engage in, support or benefit from any form of modern slavery, and must ensure the same throughout its supply chain. Specifically, Supplier must ensure:

- no forced, bonded, indentured or involuntary labour, and no human trafficking
- no child labour: workers must meet the applicable minimum working age, and young workers must not perform hazardous work
- employment is freely chosen; workers are free to leave employment on reasonable notice and are not required to lodge deposits or hand over identity documents as a condition of work
- no worker pays recruitment fees; any such fees are the employer’s responsibility
- wages meet at least the legal minimum, are paid on time, and only lawful deductions are made
- working hours comply with applicable law, and overtime is voluntary and fairly compensated
- workers may associate freely and raise workplace grievances without fear of reprisal

04

Freedom from Discrimination, Harassment and Abuse

LPA expects the highest standards of equality, diversity and inclusion, and Supplier must invest in these proactively. Supplier must ensure its workplace is free of harassment and discrimination based on race, colour, religion, national origin, gender, sexual orientation, gender identity, age, disability, veteran or military status, or any other characteristic protected by law. Supplier must have policies and practices in place to promote equality, diversity and inclusion, and to foster a workplace free from harassment and retaliation.

Supplier must treat all workers with dignity and respect, and must prohibit all forms of intimidation, threats, violence, corporal punishment, and physical, sexual, verbal or psychological abuse.

05

Health, Safety and Working Conditions

Supplier must provide a safe and healthy workplace, regularly assess it for hazards, and implement appropriate controls to minimise the risk of work-related accidents. Supplier must provide appropriate training and protective equipment, and ensure any worker accommodation is safe, clean and meets applicable standards. Supplier should seek to continually improve its health and safety performance.

06

Business Ethics

Supplier must conduct business ethically and with integrity. This includes: no bribery, corruption, facilitation payments or improper inducements; avoiding conflicts of interest; competing fairly; keeping accurate records; and protecting confidential information and personal data in accordance with law.

07

Environment

Supplier must comply with applicable environmental laws and regulations, obtain and maintain required permits, and take reasonable steps to manage and reduce the environmental impact of its operations. This includes responsible handling and disposal of hazardous materials and electronic waste.

Supplier must identify environmental risks, impacts and opportunities to improve environmental performance, and implement and regularly review controls to mitigate these, including resource use, discharges, emissions and waste disposal. Supplier's operations and sourcing practices should place particular emphasis on mitigating climate change and preserving biodiversity and ecosystems.

08

Responsible Sourcing and Supply Chain

Supplier must apply standards consistent with this Code to its own suppliers and subcontractors and take reasonable steps to understand and manage modern slavery and labour risks in its supply chain. On reasonable request, Supplier must be able to provide information about the origin of goods and components supplied to LPA.

09

Transparency and Monitoring

LPA applies a risk-based approach to supplier due diligence and monitoring, proportionate to the risk profile of, and our relationship with, each Supplier. This Code forms part of our supplier contracts, and Supplier compliance is monitored through the following measures: onboarding, annual reviews, site visits and third-party audit.

Supplier must respond honestly and promptly to LPA's due diligence enquiries, keep records sufficient to demonstrate compliance with this Code, and provide reasonable cooperation with any review, visit or audit. Where risk warrants it, LPA (or a nominated representative) may request further evidence of compliance. During any site visit or audit, all workers must be free to communicate outside the presence of management and without fear of reprisal.

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Raising Concerns

Supplier, and workers in its operations or supply chain, are encouraged to report any suspected breach of this Code, including any modern slavery concern, to LPA at feedback@lpaenergygroup.com.

Reports may be made confidentially. LPA does not tolerate retaliation against anyone who raises a genuine concern in good faith.