

Supplier Code of Conduct

Why does illion have a Supplier Code of Conduct?

illion (Australia) Pty Ltd (ABN 95 006 399 677), illion New Zealand Limited (Co. No. 361901), and their related bodies corporate (together, illion) is a leading source of data and analytics.

We operate in Asia Pacific, Europe, and North America.

illion is committed to socially and environmentally responsible procurement and acknowledges this responsibility extends beyond our own operations and into our supply chains. illion sets high standards for the way we do business so our suppliers and customers have clear expectations about the way we conduct business. This Supplier Code of Conduct sets out our expectations of suppliers in our supply chain.

Who does this Code apply to?

Our Supplier Code of Conduct, as may be amended from time to time (Code), sets out the minimum standards of behaviour we require of our suppliers. It is based on the Responsible Business Alliance Code of Conduct 6.0 effective 1 January 2018, which is a set of social, environmental and ethical industry standards which has been prepared with reference to international norms and standards including the Universal Declaration of Human Rights, ILO International Labour Standards, OECD Guidelines for Multinational Enterprises and ISO and Standards Australia standards. It forms part of our approach and policy framework to address and manage modern slavery risks in our supply chain.

Our Code is applicable to all suppliers that provide services to or on behalf of illion, including subcontractors and any third parties subcontracted by a supplier. Suppliers are expected to not only comply with the Code but also implement this Code in their own supply chain. We will provide guidance when requested, so that together we can strive for continual improvement in achieving our ethical procurement goals. illion will regularly review this Code and may revise this Code.

What does the Code comprise?

Our Code is made up of 5 sections:

- Labour
- Health and Safety
- Environment
- Business ethics
- Management system

Labour

What are our standards for labour practices?

Voluntary employment

Suppliers must respect the human rights of the people in the countries in which they operate. Forced, bonded (including debt bondage) or indentured labour, slavery or trafficking of persons must not be used. This includes transporting, harbouring, recruiting, transferring or receiving persons by means of threat, force, coercion, deception, abduction or fraud for the purpose of labour or service.

There must be no unreasonable restrictions on workers' freedom of movement including unreasonable restrictions on entering or exiting company-provided facilities.

All work must be voluntary, and employees must have the right and ability to terminate their employment, in accordance with established laws, regulations, and rules. Employees must not be required to surrender their government issued identification, passports or work permits as a condition of employment.

Child labour & young workers

The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. Child labour should not be used at any level of the supply chain.

Young Workers, those under 18 years of age, must not perform work that is likely to jeopardise their health or safety. Work must not interfere with their education or be harmful to their mental, social or moral development.

Working hours

Suppliers must ensure that working hours are in accordance with local regulations and industry practice and standards. Working hours are not to exceed the maximum set by law.

Wages and benefits

Compensation paid to workers must comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Unauthorised deductions from wages must not be permitted.

Humane treatment

There is to be no inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental, physical or verbal abuse of workers – nor is there to be the threat of any such treatment.

Dispute, disciplinary, and grievance policies and procedures must be clearly defined, communicated to workers, and uniformly applied.

Freedom of association and collective bargaining

Suppliers are to respect the rights of workers to communicate openly with management regarding working conditions without fear of harassment, intimidation, penalty, interference or reprisal.

Suppliers must recognise and respect any rights of workers to exercise lawful rights of free association, including joining or not joining any association of their choice, such as labour unions. Suppliers must also respect any legal right of workers to bargain collectively.

Labour hire

Workers must not be required to pay employers' or agents' recruitment fees or related costs for their employment. If any such fees are found to have been paid by workers, they must be repaid.

As part of the hiring process, migrant workers specifically recruited overseas must be provided with a written employment agreement in their native language that contains a description of terms and conditions of employment prior to the worker departing from his or her country of origin.

Particular attention should be given to the recruitment and treatment of at-risk groups, notably migrant workers, refugees and asylum seekers.

Anti-discrimination

Suppliers must not discriminate against any worker based on their age, disability, ethnicity, gender, race, colour, political opinion, marital status, religion, sexual orientation, national extraction or social origin, in hiring and other employment practices such as promotions, rewards and access to training.

Equality, diversity and community

Suppliers must promote a culture of equality and fairness in their supply chain and actively support programs that look to ensure a diverse worker base.

illion will continue to, where possible, pursue a strategy of Indigenous Procurement. More broadly, illion is committed to run a fair and viable business and seek to engage with suppliers that contribute to the community in which it operates in.

Health and safety

What is required of health and safety?

Suppliers must make proper provision for the health and safety of their employees, contractors, visitors and those in the community who may be impacted by their operations. Suppliers must comply with applicable international, national and state laws and standards in relation to health and safety management.

Suppliers must ensure health and safety is effectively managed, so that health and safety risks, issues, incidents and non-compliance are identified and addressed in order to provide adequate facilities to ensure the health and well-being of its workforce.

Environment

What are our standards in relation to the environment?

We recognise that sustainable economic development is dependent upon environmental protection. As such we are committed to minimising our use and where possible, maximise our re-use of resources we utilise to deliver our services.

All suppliers must comply with applicable international, national and state laws and standards in relation to the protection of the environment and environmental management, and have adequate staff responsible for managing and reporting on their organisation's environmental performance.

Suppliers should consider a lifecycle approach to minimise the environmental impact of its products and services from the extraction of natural resources to disposal. Suppliers must have written environmental sustainability policies, which address the identification, prevention, mitigation and control of serious environmental and health impacts from its operations, including its use of raw materials and impacts to greenhouse gas emissions, land, water, waste, air quality, and biodiversity.

Suppliers must abide by all legislation and regulations in relation to the handling and disposal of dangerous and hazardous materials (where applicable), and keep their use to a minimum.

Suppliers with manufacturing facilities must ensure compliance with applicable environmental laws, and all laws related to input materials, waste disposal, air emissions, toxic or hazardous materials disposal, discharges and product emissions.

Business ethics

What are our standards in relation to business ethics?

illion expects the highest standards of ethical conduct in its business operations, including its supply chain.

Suppliers are expected to be ethical in every aspect of its business, including its relationships, practices, sourcing and operations.

Business integrity

illion promotes integrity and ethics in all aspects of its activities and does not tolerate any form of bribery, corruption, extortion or embezzlement.

Suppliers must ensure they have policies in place that prohibit and stop any and all forms of bribery, corruption, extortion, embezzlement (covering promising, offering, giving or accepting any bribes), fraud, and money laundering, and comply with local laws and regulations.

Suppliers must have reasonable and lawful payment policies with their own suppliers and subcontractors.

Suppliers must comply with international and national sanctions, legislation and regulations.

No improper advantage

Suppliers must not offer or accept bribes or other means of obtaining undue or improper advantage. This includes offering, authorising, giving or accepting anything of value to illion staff or representatives, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage.

Disclosure of information

Suppliers must disclose information regarding their business operations and practices in accordance with the applicable laws, regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

Conflict of interest

Suppliers must make illion aware of any actual or potential conflicts of interest that are relevant to illion's business.

Intellectual property

Intellectual property rights must be respected. All use of technology, information and know-how must be conducted in a manner which complies with applicable international and national intellectual property laws and does not compromise the intellectual property of illion.

Fair business, advertising and competition

Suppliers must uphold standards of fair trading in business, advertising and competition.

Data protection and privacy

Suppliers must commit to protecting the reasonable privacy expectations of personal information obtained from those they do business with, including suppliers, customers, consumers and employees. Suppliers must comply with data privacy and confidential information and security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

Suppliers must not use or disclose any information belonging to illion, its existing and prospective customers, other suppliers, employees and other third parties, except as required or authorised in writing by illion.

Protection of identity and non-retaliation

Suppliers must maintain programs that ensure the confidentiality and protection of supplier and employee whistle-blowing, where required under national and state laws.

Responsible sourcing of material

Suppliers must exercise due diligence on the sourcing of materials and ensure their sourcing practices relevant to the services provided to illion are ethical and in accordance with human rights and law.

Compliance

Suppliers must comply with all applicable local laws and regulations in all the countries in which they operate. Where this Code goes further than local standards, suppliers must adhere to the Code in a way that is appropriate.

Management system

A management system to ensure compliance

Suppliers must adopt or establish a management system whose scope is related to the content of this Code. The management system must be designed to ensure compliance with applicable laws, regulations, customer contractual requirements, conformance with this Code, and the identification, mitigation and management of risks related to this Code, including any potential negative impacts to illion's brand and reputation.

illion may review the Supplier's policies, procedures or any documents related to compliance with the Code.

The management system should contain the following elements.

Commitment to good corporate governance and environmental responsibility

A corporate governance and environmental responsibility policy statement affirming the Supplier's commitment to good corporate governance and environmental practices and processes to ensure compliance with this Code.

Management accountability and responsibility

Clearly identify representative(s) that are responsible for ensuring the implementation of the management systems and associated programs. The identified person(s) must actively, transparently and collaboratively communicate with illion's representative.

Legal and customer requirements

Identify, monitor and understand applicable laws, regulations and customer requirements regarding corporate responsibility.

Adequate documentation and records to evidence regulatory compliance and license to operate must be in place.

Training and communication

Supplier must ensure that policies and procedures designed to meet applicable legal and regulatory requirements and the aims of this Code are communicated to its managers and workers, and that they are appropriately trained.

Supplier's responsibility

Suppliers must take reasonable steps to monitor their supply chain to ensure their suppliers are aware of and are compliant with the principles of this Code. If any ethical or legal compliance issues arise that are not compliant with the Code, Suppliers have the responsibility to notify illion promptly.

Supplier Compliance

What do we expect of suppliers?

illion requires Suppliers to agree and adhere to these requirements and to be able to demonstrate to illion how these requirements are being met.

illion may verify the compliance of all its direct suppliers with the Code. Such verification will be conducted by way of a supplier self-evaluation or, where agreed, an audit by illion (or an external resource designated by illion) who may visit the supplier's facilities with appropriate notice.

Compliance with the principles contained in the Code is a criteria that will be taken into consideration in illion's supplier selection process.

Whenever a situation of non-compliance is identified, or a supplier finds it difficult to undertake appropriate measures, this should be reported and shared with the relevant representative of illion. As a preferred course of action, illion commits to work with suppliers to develop and implement a corrective action plan to improve the situation. Should there be instances of repeated non-

conformance, illion will regard such conduct as a serious failure to adhere to this Code and reserves its rights accordingly.

Suppliers confirm that they have read the Code and acknowledge the requirements.

Contact

To raise a concern, the Supplier can send an email to: procurement@illion.com.au

illion will ensure that all raised compliance issues in the Code are resolved quickly, fairly and at the proper level in illion.