

Code of Conduct for Business Partners

Rollease Acmeda is committed to conducting business with the highest ethical standards. Maintaining these standards has never been more important than in today's competitive and rapidly changing global business climate.

This Rollease Acmeda Code of Conduct for Business Partners ("Code") sets the expectations and standards for new and ongoing business and applies to agents, distributors, dealers, contractors, intermediaries, suppliers and other business partners ("Business Partners") of Rollease Acmeda and its operating subsidiaries.

The highest legal, moral and ethical standards of honesty, integrity and fairness are to be practiced in the conduct of Rollease Acmeda's affairs. In order to meet this standard, Rollease Acmeda expects each of its Business Partners to operate and act in full compliance with this Code and all applicable laws and regulations. Rollease Acmeda expects that Business Partners will hold their suppliers and other third parties to the same standards, and as such this Code also applies to affiliates and subcontractors of Business Partners and to their respective facilities to the extent those facilities supply goods and services for ultimate sale or use by Rollease Acmeda

Rollease Acmeda reserves the right to assess conformance to these requirements and will expect our Business Partners to correct non-conformance issues identified during assessments. Upon request, Business Partners will provide Rollease Acmeda with information to enable it to assess conformance with the code. We want to work with our Business Partners to improve conditions. If a Business Partner refuses or is unable to correct a non-conformance to our satisfaction, we may terminate the relationship as a last resort.

This code consists of five parts:

1. Core Values
2. Associate Code of Conduct
3. Responsibility of Business Partners
4. Rollease Acmeda's Commitment to Business Partners
5. Resolving Ethics Issues

After a detailed review of this Code, the Business Partner will be fully aware of the standard to which Rollease Acmeda holds itself and the expectations of its Business Partners actions.

1. Our Core Values

Rollease Acmeda can be most successful when we work towards a common purpose and share common values. Our shared culture helps us consistently act in the best interests of our customers, our associates, and our communities. This shared culture is based on our 5 core values:

- **Consideration:** We are respectful and value diversity. We show empathy, integrity, and kindness for each other, our partners and our community.
- **Cooperation:** We are customer focused – We build strong relationships with our teams and partners and work collaboratively toward shared objectives.
- **Communication:** We are forthcoming - We provide constructive and purposeful feedback to achieve alignment through clear and effective interactions.
- **Innovation:** We are innovative market leaders – We are curious, creative, and evolve to continuously improve.
- **Accountability:** We are action oriented – We take responsibility for our decisions and deliver on our commitments by being proactive contributors to the company.

2. Associate Code of Conduct

Rollease Acmeda holds all if its associates, when they are acting in connection with their official Rollease Acmeda duties, to the policies set out by the Rollease Acmeda Code of Conduct, available upon request by contacting your Rollease Acmeda representative.

As a company with global operations, we are committed to following the laws and regulations applicable to the locations in which we operate. Where this Code differs with the local laws, we aspire to follow the higher standards unless actions required by the Code are prohibited by local law. Compliance with the Code and applicable laws are the minimum standard of conduct. All associates are expected to act with the highest business ethics in all Rollease Acmeda activities and transactions.

3. Responsibility of Business Partners

As an extension to our Associate Code of Conduct, the following describes the responsibilities of Business Partners doing business with Rollease Acmeda. These highlight the expectations of our Business Partners, over and above any other contractual agreements such as supply, agent or distribution agreements and purchase orders. Rollease Acmeda reserves the right to amend this list of responsibilities as it sees fit.

Business partners are expected to adhere to the following requirements:

Legal Requirements

- Comply with all applicable international, national, state or regional laws and regulations in the countries in which they operate

Discrimination

- Must not discriminate based on race, gender, religion, ethnicity, nationality, sexual orientation, and/or political beliefs.

Wages & Benefits

- Comply with all applicable wage and hour laws and regulations and provide legally mandated benefits.

Child Labor

- Must not employ workers younger than the local, legally required minimum age. In the absence of local law, Business Partners shall not employ children under the age of 15, or in those countries subject to the developing country exception shall follow the requirements of the ILO Convention 138.

Freedom of Association

- Provide associates with the right to freely associate, organize, and bargain collectively within the legal framework of the respective countries.

Limitations on Gifts and Gratuities

- Neither accept nor give payments or gifts to Rollease Acmeda associates or third parties in exchange for business opportunities.

Forced Labor – Physical Coercion

- Will not use forced, bonded, indentured or slave labor.

Antitrust & Competition Laws

- Comply with all applicable antitrust and competition laws which prohibit agreements or actions that unreasonably restrain trade, are deceptive or misleading, or unreasonably reduce competition without providing beneficial effects to consumers.
- Price-fixing. Bid rigging, collusive tenders, and market/customer allocations are all strictly prohibited.

Human Rights

- No violation of basic human rights, including harsh or inhumane treatment such as sexual harassment, abuse, mental or physical coercion, or verbal abuse of its workers.
- Abides by all relevant laws, principles and standards such as the United Nations Declaration of Human Rights, International Labour Organisation (ILO) Conventions and the Modern Slavery Act 2018.

Environmental

- Have an effective environmental policy and conduct their operations in a way that protects the environment.
- Obtain and keep current all required environmental permits and meet all applicable environmental rules, regulations and laws in the countries where they do business.

Health & Safety

- Provide a safe work environment and conduct themselves in a manner consistent with the applicable safety standards, including governmental requirements, operations and facility specific safety requirements, and contractual requirements.
- Identify and respond to any public health impacts of their operations and use of their products and services.

Anti-Corruption & Bribery

- Under the U.S Foreign Corrupt Practices Act and other applicable anti-corruption laws in the countries where we do business, must not give or offer “anything of value” to a foreign government official or employee of a state-owned enterprise, including gifts and hospitality.
- Anything of value can include bribes, kickbacks, gifts, entertainment and even contributions to a foreign government officials’ favorite charity.

No Retaliation

- Employ a no-retaliation policy that permits workers to speak with Rollease Acmeda staff without fear of retaliation by supplier management.

Confidentiality

- Keep all agreements and Rollease Acmeda customer information confidential, including pricing and marketing allowances and all Rollease Acmeda branded product specifications.
- Respect the privacy of our customers and do not share personally identifiable information belonging to our customers.

Global Trade Compliance

- Never seek to mislead or improperly or illegally avoid payment of import duties, taxes and fees, and never engage in activities meant to evade the legal requirements of international tariffs and trade.
- Know with whom they are dealing and must not engage with or facilitate business with entities or individuals specifically prohibited by law. Furthermore, be aware of, and comply with, restrictions on dealing with entities and individuals located in countries that are subject to trade embargoes or economic sanctions imposed by Australia, the United States and other countries where we do business.

Management Systems

- Adopt or establish a management system that supports content of this Code.
- Drive continuous improvement in these areas.
- Hold their suppliers, contractors, and distributors to these same standards.

4. Rollease Acmeda's Commitment to Business Partners

Rollease Acmeda's relationship with its business partners is characterised by honesty and fairness. We are guided by the following standards of behavior:

- We will not make payments to any employees of Business Partners to attain lower prices or additional business.
- We will not reveal any Business Partnership pricing, technology or other confidential information without prior written permission.
- We will not make false or misleading remarks to others about the Business Partners or their products or services.
- We will hold our Business Partners to the same standards and expectations to which we hold our own operations and associates.

5. Resolving Ethical Issues

Associates wishing to seek guidance or to report concerns can do so by discussing the issue with a manager, supervisor or HR representative.

Any associate or business partner wishing to report a possible breach of this policy confidentially, can do so by reporting to a Rollease Acmeda Authorised Recipient, who can be contacted in the following ways:

- Angela Byron (HR Manager), angela.byron@rolleaseacmeda.com, 03 9355 0100
- Damien Gill (Financial Controller), damien.gill@rolleaseacmeda.com, 03 9355 0100
- Tim Way (Managing Director), tim.way@rolleaseacmeda.com, 03 9355 0100

6. Business Partner Declaration to the Policy

By ticking the following boxes and signing this document you declare that you, on behalf of your business, have read and understood the Rollease Acmeda Business Code of Conduct, and in doing so will abide by the rules and regulations that have been set out in this document.

- ☐ I declare that our business will abide by the rules and regulations set out in this document.
- ☐ I declare that our business has never been involved in any activities that might lead to, or have breached any part of the Modern Slavery Act 2018, or the IL Convention 138.
- ☐ I declare that we will monitor our business partners to ensure as providers of product ultimately supplied to Rollease Acmeda that they have never been involved in any activities that might lead to, or have breached any part of the Modern Slavery Act 2018, or the IL Convention 138.
- ☐ I agree to Rollease Acmeda associates making regular visits and conducting assessments on our business sites to identify and report on any breaches to this policy.

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Authorised Signatory (Name & Signature)

.....
Date

On behalf of (Business Entity)

Company Stamp

Revision and Approval Status

Rev.	Date	Nature of Changes	Reviewed By	Approved By
R00	10-Feb-2025	First Release	D. Phillips	G. Adam