

Supplier Code Of Conduct

Code overview	<p>Purpose: The intent of this Code is to share our principles and clearly communicate the expectations that our Group Organisation (the Group) places upon our suppliers – Including throughout their own supply chains- when providing products and services to us. By Suppliers we mean any organisation that provides products and services to the Group. Our suppliers must review this Code and acknowledge that it has been read and understood. This Code will be reviewed and amended (if required) annually. Suppliers to the Group should check for the most recent version on our website.</p>
	<p>Regional scope: This Code applies to all entities that make up the First Sentier Investors business globally (“The Group”).</p>

Commitment and Principles

The Group expects the highest ethical practices and professional standards from its employees through their commitment to the following business practices and principles:

- Compliance with all applicable laws and regulations;
- Socially responsible and sustainable practices;
- Valuing and respecting all people by leveraging diverse backgrounds;
- Robust corporate governance;
- Displaying integrity with a proactive focus on risk awareness and management;
- Environment stewardship by mitigating environmental impacts; and
- Acting responsibly to mitigate and safeguard the Group’s, employees, customers, brand, reputation, assets and information.

We expect our suppliers, and their supply chain, share our values and adhere to these same principles which underpin the Code.

Social

Some key impacts a supplier may have on the social systems in which they operate include but are not limited to:

Human Rights

We expect that suppliers to the Group will:

- Be aware that human rights are universal and fundamental rights that preserve the inherent freedom, dignity and equality of all human beings.
- Comply with international human rights laws and norms set out in the international Bill of Human Rights and the International Labour Organisation Declaration on Fundamental Principles and Rights at Work.
- Manage their operations and their own supply chain guided by applicable regulation.
- Ensure compliance with relevant laws affecting forced or involuntary labour, child labour, and discrimination and security practices.
- Ensure that company products, services or facilities are not used for human trafficking and/or labour or sexual exploitation.
- Not use forced, bonded or involuntary labour so that, for example, workers are free to leave after their shift ends, or to resign their employment after giving reasonable notice. In particular, we expect compliance with global supply chain requirements such as those covered by the UK Modern Slavery Act 2015, Australian Modern Slavery Act 2018 and other equivalent jurisdictional requirements.

- Allow freedom of association and collective bargaining for workers to join or form trade unions of their own choosing and bargain collectively.

Diversity, Equal Employment Opportunity (EEO) & Anti- Discrimination

The Group's diversity and inclusion strategy values and respects all people, leveraging diverse backgrounds, experiences and perspectives.

We expect Suppliers to the Group will:

- Have EEO, anti-discrimination and anti-harassment policies in place which meet or exceed requirements of any relevant laws where the product is made or service delivered.
- Ensure hiring practices are based on an individual's ability to do the job and are not based on personal characteristics including, but not limited to gender, ethnic origin, age, religious beliefs or practices, family responsibilities/parental status/marital status, pregnancy, disability, sexual orientation/ identity and physical appearance.
- Be committed to establishing culture of respect and inclusion through valuing and respecting differences in their staff.

The Group may invite our suppliers to participate in diversity and inclusion training as appropriate.

Labour Practices

We expect that suppliers to the Group will:

- Provide fair pay and working conditions for employees, including meeting minimum wage and compensation requirements.
- Provide fair working hours, leave, adequate rest periods and legally mandated benefits to the country in which they operate.
- Make provision for parental and carers leave as required by law.

Work Health and Safety (WHS)

The Group is committed to ensuring the health and safety of our people, customers, contractors and visitors. This may include the provision of safe operating procedures, installation and maintenance manuals, registrations, licensing or competency requirements and material safety data sheets.

We expect that suppliers to the Group will:

- Comply with all legal responsibilities under applicable legislation in which they operate
- Provide workers with a safe and clean working environment meeting the legal requirements of the country in which they operate, with appropriate training to perform their jobs safely.

Environmental

The Group is proactive in measuring and reducing its environmental footprint, with the aim of procuring products and services that have the least possible negative environmental impact.

We expect suppliers to the Group will:

- Meet all relevant local and national environmental protection laws, regulations and standards as well as strive to comply with international environmental protection standards.
- Actively manage the environmental impact of their operations, and take responsibility for minimising the negative impact of their products and services throughout their lifecycle.
- Identify and manage environmental risks (such as energy usage, water usage, waste and emissions).
- Have suitable sustainable certification related to the primary materials in their product (e.g. sustainable forestry certification for paper products).
- Have reporting capability on energy consumption and greenhouse gas emissions.

Transparency and Governance

The Group uses a Risk assessment framework to assess financial and operational risk exposure. To assess our supply chain risk exposure, we consider a suppliers location, manufacture process and product lifecycle as well as their responses to our Due Diligence Questionnaire.

We expect that suppliers to the Group will:

- Comply with all local and national laws and regulations pertinent to their operations regarding all products and services they provide to the Group. This also extends to their own supply chain.
- Understand regulatory and compliance obligations applicable to the product or service.
- Actively manage performance and risk and proactively bring anything of concern to the Group's notice in a timely manner.
- Co- operate fully with the Group or its nominated auditor by providing reasonable access to its premises, its staff and relevant documentation, as required.
- Have a whistleblower policy or process that is clearly communicated and understood by employees, protecting employee whistleblowers and prohibiting retaliation or victimisation.
- Have a documented and tested Business Continuity Plan (BCP) in place in the event of a crisis (e.g. fire, flood) to maintain key business operations.

Anti-Bribery and Corruption; and Tax Evasion

It is the responsibility of the supplier to implement procedures for their employees to comply with applicable anti-bribery and corruption laws. Also to ensure that they and their associates are not involved in the facilitation of tax evasion. The Group has a zero tolerance approach to bribery, corruption and tax evasion. Suppliers are expected to provide us on request with a description of the process and procedures in place to prevent activities of this nature.

Data Protection

It is the responsibility of all Suppliers to ensure compliance with applicable Data Protection Laws.

Information relating to the Group must be protected against unauthorised access or modification, whether malicious and/or accidental by:

- Protecting confidentiality, availability and integrity of valuable information assets;
- Preventing reputational damage and exposure;
- Preserving the privacy of employees, contractors, associates, clients and suppliers.

It is expected that suppliers to the Group have appropriate and contractual clauses with any contractors / suppliers to protect Group data from being re sold to external parties.

Supply Chain Management

The Group has a responsibility to stakeholders to ensure its entire supply chain is aware of, and adheres to, its principles. We are committed to helping our suppliers comply with the Code and in turn, expect our suppliers to require their own supplier to comply with the Code.

We expect that suppliers to the Group will:

- Communicate this Code to their own organisation as well as their supply chain, so that all are aware of, and comply with this Code.
- Proactively work with their own suppliers to ensure the principles within this Code are met.
- Demonstrate a willingness and commitment to comply with this Code of Conduct.

Assessment

We reserve the right to carry out regular assessments of the practices of our suppliers to ensure alignment with the Code. This may include self-assessment by suppliers, or a request for additional information, or on-site visit. We also reserve the right to audit our suppliers.

We expect that suppliers to the Group will:

- Respond in full and be open and honest in response to any request for information.
- Complete an agreed corrective action plan until a satisfactory level of improvement is reached should any breaches or shortcomings regarding the Code be identified.

Speak up Hotline

Service providers, suppliers and their employees with information or concerns in relation to any act of internal fraud or unethical behaviour by Group Staff have the option of reporting the issue via:

- Websites using the links below;
- The global direct access telephone hotline on +1-844-319-1607, or a local toll free number in the following locations;

NAVEX Ethicspoint (external service provider) Navex Ethicspoint	Website: www.firstsentierinvestors.ethicspoint.com
	Australia 1-800-515-184
	Hong Kong 800-93-3975
	United Kingdom 0808-234-5817
	United States 844-319-1607
Singapore (Star Hub): 800-001-0001 OR (SingTel) 800-011-1111	
MUFG Americas Integrity Line (for US)	Website: www.MUFGAmericasIntegrityLine.com Hotline: 1-877-384-4274

Glossary of Terms

Anti-Bribery and Corruption (ABC) – ABC refers to a company having the appropriate policies, procedures and controls operating within the business to ensure that staff are aware of and have the tools in place to avoid the illegality of offering, promising, giving, requesting, agreeing, receiving or accepting bribes.

Business Continuity Plan (BCP) – A clearly documented strategy known by all staff which ensures the safety of staff and continuity of services in the event of a disaster.

Data Protection – Data protection is the process of safeguarding important information from corruption, compromise, loss or misappropriation.

Diversity and Inclusion – a diverse and inclusive workplace is one that makes everyone, regardless of who they are or what they do for the business, feel equally involved and supported in all areas of the workplace.

Due Diligence Questionnaire - is the process of evaluating the risks involved in a partnership with a potential vendor. It helps organizations avoid or mitigate threats.

Equal Employment Opportunity (EEO) – EEO is the principle that everyone can have equal access to employment opportunities based on merit, without fear of discrimination or harassment.

Fair Working – refers to the working environment and all existing circumstances affecting labour in the work place, including job hours, physical aspects, legal rights and responsibilities. It also covers the emotional protections such as the right to an environment free of harassment and discrimination.

Whistleblower Policy - a legal document that companies must make publicly available and easily accessible for all employees and other persons engaged by the company. This Policy is intended to encourage whistleblowers to come forward with their concerns and protect them when they do, the Corporations Act 2001 (Corporations Act) gives certain people legal rights and protections as whistleblowers.

Work Health and Safety – sometimes referred to as occupational health and safety (OH&S) involves the management of risks to the health and safety of anyone who works for a company as well as customers, visitors and suppliers.