



ZETRON



Minelab Electronics, Zetron, and DTC are members of Codan Limited.

Codan Limited and its Controlled Entities (Codan)

Supplier Code of Conduct

Introduction

Codan Limited (**Codan**), listed on the Australian Stock Exchange, is a proud and iconic South Australian technology company. Codan prides itself upon its corporate compliance and broader corporate responsibility to all its stakeholders, as set out in its Code of Conduct. Suppliers are an integral part of the Codan business and Codan expects its suppliers to share its core values and to behave in line with the principles in its Code of Conduct. For greater transparency, Codan has established a Supplier Code of Conduct (**Supplier Code**). The Supplier Code sets out the minimum standards and expectations for all Codan suppliers.

Application

The principles set out in this Supplier Code apply to all third-party suppliers, employees of suppliers and contractors (**Suppliers**) engaged to provide any goods and/or services required throughout the supply chain of all controlled entities within the Codan Group.

The Supplier Code should be read in conjunction with Codan's policies on Anti Bribery and Anti Corruption, Modern Slavery, as well as the Codan Core Values and Code of Conduct, which are published on the Codan website.

Business Integrity and Ethics

In line with Codan's Code of Conduct, Codan expects its Suppliers to maintain high standards of ethical conduct in all aspects of its business, including (but not limited to):

- Zero tolerance of dishonest, fraudulent or anti-competitive behaviour;
- Never engage in bribery or corruption;
- Comply with laws, customs and regulations of the countries in which it operates;
- Suppliers must not accept any gift or benefit that might compromise or influence its business and broader judgement;
- Comply with data privacy and regulatory requirements;
- Comply with the ILO Declaration on Fundamental Principles and Rights at Work;
- Respect intellectual property rights and safeguard customer information. Suppliers shall manage technology and know-how in a manner that protects intellectual property rights; and
- Responsible sourcing including due diligence on all relevant materials in their supply chain including conflict minerals as set out in Codan's Conflict Mineral Policy found [here](#).

Labour and Human Rights

In line with Codan's Modern Slavery Policy, Codan expects its Suppliers to

- Recognise the freely exercised right of workers without the use of Modern Slavery (which includes forced labour, child labour, debt bondage, deceptive recruiting for labour, human trafficking);
- Have a zero-tolerance approach to bullying, harassment and other physical and emotional abuse;
- Provide fair and conducive working conditions for their employees; and
- Ensure that all tantalum, tin, tungsten and gold used in products manufactured for Codan are conflict free.

Health and Safety

Workplace health, safety and wellbeing is critical to Codan, as is demonstrated in its Sustainability Report. Codan expects its Suppliers to:

- Provide and maintain a safe work environment and integrate appropriate and sound health and safety management practices into its business;
- Follow all relevant laws and regulations related to Workplace Health and Safety;
- Identify, evaluate and manage occupational health and safety hazards through a prioritised process of hazard elimination, substitution, engineering controls, administrative controls, and/or personal protective equipment;
- Provide employees with workplace health and safety training; and
- Maintain a system for employees to report any health and safety incidents and near-misses and implement corrective actions to mitigate risks.

Environment and Sustainability

Codan is committed to developing a more sustainable business by minimising its environmental impact and in turn expects its Suppliers to:

- Comply with all relevant laws and regulations on environmental management and reporting;
- Have a hazardous waste management system to manage, reduce and dispose hazardous waste;
- Proactively work to reduce environmental harm by minimising pollution and waste and efficient use of natural resources; and
- Upon Codan's request, provide accurate and timely information regarding their greenhouse gas (GHG) emissions footprint, including any portion reasonably attributable to the goods and/or services supplied to Codan. Suppliers must also respond to any additional environmental requests for information made by Codan, including but not limited to data on energy usage, waste management, water consumption, and sustainability initiatives. Such disclosures must be supported by appropriate records, calculations, or third-party verification where reasonably available.

Compliance

By accepting Codan's Standard Purchase Terms, Suppliers agree to accept and comply with this Supplier Code as part of its ongoing relationship with Codan.

If a Supplier has any concerns about non-compliant behaviour by Codan employees or by another Supplier, you can raise these concerns with STOPline, an independent and confidential hotline, or directly to Codan's General Counsel.

General Counsel	+61 (0)88305 0311
	daniel.widera@codan.com.au
STOPline	1300 30 45 50 (Australia)
	+61 3 9811 3275 (overseas)
	codan@stopline.com.au

