

GROUP POLICY | SUPPLIER

Code of Conduct



An aerial photograph of a rocky coastline. The top half of the image shows a rugged shore with numerous light-colored, rounded boulders of various sizes. The water is a vibrant turquoise color, with white foam from waves crashing against the rocks. In the lower half of the image, a small boat is moving across the water, leaving a long, white wake behind it. The overall scene is serene and natural.

Acknowledgment of Country

Flinders Port Holdings acknowledges the Traditional Owners of the land and waterways on which we operate, and pays respect to Elders past, present and emerging.

We're working towards reconciliation and engaging with Traditional Owners is a critical part of business on an acute port and local community level, but also on a far greater scale, contributing to the growth of unity between Aboriginal and Torres Strait Islander peoples and non-Indigenous peoples across Australia.

We acknowledge that our business operations spread across six Aboriginal and Torres Strait Islander lands. These are Kurna, Bangarla, Naranga, Nawu, Wirangu and Nukunu.



Supplier Code of Conduct

Flinders Port Holdings (FPH) and its related bodies corporate is committed to conducting business safely, ethically and sustainably. This Supplier Code of Conduct outlines the minimum standards of behaviour and business practice we expect from all Suppliers when delivering works, goods or services to FPH.

1. Legal, Statutory and Regulatory Compliance

Suppliers must comply with all applicable local, state, national, and international laws, regulations, and standards.

2. Health, Safety and Security

Suppliers shall:

- Prioritise the safety of their own and FPH workers, port users, visitors and the public in their operations;
- Implement safe work systems, practices and procedures, risk management and emergency preparedness; and
- Comply with all site induction, personal protective equipment and site security protocols.

3. Environmental Stewardship and Sustainability

Suppliers shall:

- Identify and manage any and all environmental risks in undertaking the provision of works and services;
- Follow FPH's Environmental Standards in delivering works and services;
- Report environmental incidents immediately and co-operate in remediation efforts; and
- Support FPH's sustainability objectives.

4. Ethical Business Practices

Suppliers shall:

- Conduct business with honesty and integrity, free from bribery, corruption, fraud or facilitation payments;
- Avoid conflicts of interest and declare any potential conflicts to FPH promptly; and
- Maintain accurate records and transparent reporting.

5. Labour and Human Rights

Suppliers shall:

- Provide a workplace free of harassment, discrimination and forced labour;
- Uphold human rights of workers including the right to fair wages, reasonable and safe working hours and freedom of association;
- Not engage in or be complicit in modern slavery practices;
- Promote a culture of equality and diversity;
- Adopt practices that promote equality of opportunity and treatment for all to avoid unlawful discrimination; and
- Engage with, and seek positive outcomes for the communities we work in.

6. Quality and Innovation

Suppliers are expected to:

- Provide and deliver works, goods and services which meet all agreed quality, safety and reliability standards;
- Maintain certifications and licencing where applicable;
- Utilise continuous improvement practices to align with industry best practice;
- Encourage innovation in the identification of more sustainable and valuable alternatives for FPH's consideration; and
- Promote collaboration and co-operation to add value to FPH's supply chains.

7. Data Privacy, Confidentiality and Information Handling

Suppliers shall:

- Protect FPH information, including personal information, confidential business information and any operational or security sensitive information, from unauthorised access, use, disclosure, alteration or loss;
- Handle, store, transmit and dispose of FPH information securely, using appropriate safeguards (for example access controls and encryption where appropriate); and
- Promptly notify FPH of any actual or suspected privacy breach or unauthorised disclosure involving FPH information and co-operate with investigation, containment and remediation.

8. Technology, Cybersecurity and Service Resilience

Suppliers shall:

- Maintain an information security program and appropriate security controls aligned to a recognised standard (ISO 27001, NIST Cybersecurity Framework, Essential Eight or equivalent) or proportionate to services and risk of services provided;
- Ensure secure access controls including multi factor authentication, least privilege, auditable privileged access, and timely access removal;
- Notify FPH promptly, and within required timeframes, of any actual or suspected cyber security or privacy incident that may affect FPH information, systems or services, and support any associated investigation, containment, remediation and recovery;
- Protect FPH data including restrictions on use, storage location disclosure, retention limits and secure return or disposal at end of contract;
- Manage subcontractor and supply chain risks and flow down equivalent obligations; and
- Maintain business continuity and disaster recovery arrangements proportionate to the service.

9. Reporting

FPH fosters a culture where we encourage our workers, suppliers, and stakeholders to speak up if they feel uncomfortable or feel something isn't right. In demonstrating FPH's commitment to ensuring these minimum standards are supported, concerns about compliance with this Supplier Code of Conduct can be reported to:

- FPH Procurement and Supply Chain team at fpprocurement@flindersports.com.au; or
- Anonymous reporting through FPH's Whistleblower reporting mechanism either by telephone FairCall 1800 500 965 or through the website by [clicking here](#).



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