

Policy Pillar	Corporate
Policy Framework	Financial Sustainability
Scope	All Brightwater Suppliers All Brightwater staff involved in the procurement of goods and services.
Scope – Service Area	Procurement of Goods and Services

1. PURPOSE AND SCOPE

Brightwater Care Group (**Brightwater**) is committed to ethical, sustainable and socially responsible procurement and we expect the same high standards of our Suppliers. We view our Suppliers as partners, and we care about the way they do business when providing goods or services.

The Supplier Code of Conduct (**Supplier Code**) describes the minimum expectations in the areas of integrity, ethics and conduct, conflict of interest, gifts, benefits and hospitality, corporate governance, labour and human rights, health and safety, and environmental management. Suppliers to Brightwater are advised to review the Supplier Code and ensure that relevant areas of their business and supply chain meet these standards. The Supplier Code is not intended to supersede or alter the Supplier's regulatory and contractual obligations.

2. BRIGHTWATER'S EXPECTATIONS OF ITS SUPPLIERS

Suppliers are expected to self-assess their compliance with the Supplier Code and take timely action to correct any deficiencies or breaches reported or identified by an audit, assessment, inspection, investigation or review. Brightwater may request Suppliers provide evidence and confirmation of their compliance with the Supplier Code. In addition to this Supplier Code, Brightwater requires certain Suppliers (typically client-facing and/or regular contractors) to undergo integrity screening in line with its Integrity Screening Policy.

2.1 Integrity, Ethics and Conduct

Brightwater expects high standards of ethical conduct and compliance with all applicable laws. Suppliers are expected to be ethical in their business activities, including relationships, practices, sourcing and operations.

- **Business integrity**

Suppliers are expected to comply with all anti-bribery, anti-corruption, anti-money laundering and modern slavery laws. Suppliers must not engage in, either directly or indirectly, fraudulent, corrupt, exploitative or collusive activities.

- **Record keeping and documentation**

Suppliers are expected to maintain adequate records that accurately record all financial transactions and information regarding its business activities, labour, health and safety and environmental practices in accordance with applicable laws, policies and procedures. Disclosure of information is expected to be undertaken without falsification or misrepresentation.

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- **Professional conduct**

Suppliers are expected to conduct themselves in a manner that is fair, professional and that will not bring Brightwater into disrepute.

- **Confidentiality**

Suppliers must not improperly use any private, confidential or commercially sensitive information in its possession relating to or in connection with its dealings with Brightwater.

2.2 Conflict of Interest

Brightwater believes that all business activities should be undertaken with impartiality and any conflict of interest should be raised and managed.

Suppliers must:

- a) declare any situation that raises an actual, potential or perceived conflict of interest related to or in connection with its dealings with Brightwater; and
- b) avoid financial, business or other relationships which may compromise the performance of their duties under their business arrangement with Brightwater. Any conflicts of interest that cannot be avoided are expected to be declared and managed appropriately.

2.3 Cyber Security and Privacy

Suppliers must ensure they have robust data privacy and security measures to protect personal information from unauthorised access, use, and disclosure. They must comply with all relevant privacy and health care laws and contractual obligations with Brightwater, including adhering to Brightwater's Information Security Policy and Privacy Policy. Suppliers should align to standards like ISO 27001: Information Security, use personal data only for intended purposes, and sign NDAs if requested by Brightwater to safeguard confidential information. Suppliers are required to promptly notify Brightwater of any security incidents or data breaches as well as significant changes to their security practices. Additionally, suppliers must ensure their third-party subcontractors comply with these security requirements. Brightwater reserves the right to audit and verify compliance, and suppliers must provide information on their data protection practices when requested.

2.4 Gifts or other Benefits

Suppliers should have in place a policy on gifts and entertainment practices. Brightwater has strict internal policies that govern the acceptance of any gift, benefit or hospitality.

2.5 Corporate Governance

Commitment to sound management administration, risk and corrective action systems are key to a reliable supply chain for Brightwater. Suppliers are expected to maintain sound administration processes.

- **Risk assessment and management**

Suppliers should develop and maintain a process to identify, manage and control relevant risks associated with its operations. These include supply chain risks and risks relating to labour and human rights, health and safety, the environment, business ethics, and corporate governance.

- **Labour and human rights**

Brightwater is committed to human rights and equal opportunity in the workplace, which includes the expectation that suppliers will ensure their employees are treated fairly and with dignity and respect. Suppliers are expected to provide goods and services in a manner consistent with any applicable human rights obligations.

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- **Respect and fair treatment**

Suppliers will comply with all applicable laws on non-discrimination and anti-harassment in hiring and employment. Suppliers will maintain a workplace where business activities are conducted with respect and where treatment is fair and without abuse, notwithstanding local legal requirements that may say otherwise.

- **Working hours, wages and benefits**

Suppliers must:

- follow all applicable laws and regulations with respect to wages, working hours and workers compensation insurance;
- ensure that all workers receive their legally mandated minimum wages, benefits, superannuation, leave entitlements and time off for legally recognised holidays; and
- pay workers' wages as required under applicable laws in a timely manner and not be expected to use wage deductions as a disciplinary measure. All overtime is expected to be reasonable and paid at the rate and in accordance with the applicable laws.

- **Freedom of association and collective bargaining**

Suppliers are expected to freely allow workers to associate with others, form and join (or refrain from joining) industrial organisations or associations of their choice and bargain collectively, or engage in any lawful industrial activity without interference, discrimination, retaliation or harassment.

2.6 Health and Safety

Suppliers will provide a healthy, safe and secure workplace for workers, visitors, contractors and customers. Brightwater requires that our suppliers will:

- comply with all legal responsibilities in regards to Work Health and Safety Matters in the country/countries that they operate, including Western Australia;
- have a proactive approach to the management of health and safety risks, including but not limited to hazard identification, incident and accident prevention and response processes in place, appropriate training to perform work safely and consultation process in place;
- provide goods and services that are safe for intended use for all of Brightwaters stakeholders; and
- inform Brightwater of any relevant WHS matters associated with the supply of goods or services and what Brightwater ought to be aware of to ensure the ongoing safety when these goods or services are utilised.

2.7 Supplier sustainability

Brightwater is committed to promoting environmental responsibility. Suppliers are expected to minimise the environmental impact of their operations and maintain environmentally responsible policies and practices.

- **Environmental impacts**

Suppliers must comply with all applicable laws and regulations relating to the environment, including any management and reporting obligations. Suppliers are expected to manage the environmental impact of their operations by:

- ensuring the safe storage, transportation and disposal of hazardous substances including hazardous waste;



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- b) maintaining policies and practices for the efficient use of energy, water and natural resource consumption; and
- c) maintaining policies and practices that reduce the risk of pollution, loss of biodiversity, deforestation, damage to ecosystems and greenhouse gas emissions.

2.8 Diversity, equity, and inclusion (DEI)

Brightwater believes in the power of diversity, aims for nothing short of equity for everyone within Brightwater, and is committed to an authentic culture of inclusion. Suppliers will comply with all applicable DEI related laws and consider how business decisions affect diversity, equity, and inclusion in their workplace. Furthermore, Suppliers are encouraged to consider using First Nations businesses when subcontracting to help stimulate First Nations entrepreneurship, business and economic development and should ensure partnerships with Aboriginal and Torres Strait Islander peoples are entered into with free, prior and informed consent and are fair, equitable and deliver genuine benefits to the First Nations party.

2.9 Accountability and compliance

Suppliers must comply with this Supplier Code and applicable laws. Suppliers will be responsible for any monitoring or documenting of their compliance and their efforts to promote compliance within their supply chains. Brightwater reserves the right to investigate any instances of a supplier's non-compliance of which it becomes aware. Non-compliance may be grounds for Brightwater to void or terminate contractual obligations with a supplier without penalty.

- **Reporting**

If a Supplier considers that a deviation or breach of the Supplier Code has occurred, it is expected to report these concerns initially to the Brightwater Procurement Manager (purchasing@brightwatergroup.com), or if there is no such appointed person then either the appointed manager under the contract or the primary contact in relation to the goods or services being provided. Suppliers may also make a Protected Disclosure to a Brightwater Whistleblower Protection Officer (Whistleblower@brightwatergroup.com) if they believe, on reasonable grounds, that a Brightwater staff member may have engaged in illegal conduct or misconduct.

3. DEFINITIONS

The following definition(s) are relevant to this Policy.

Term	Definition
Anti-bribery	Not engaging in or tolerating any form of bribery, kickbacks, extortion, or improper payments to influence business decisions.
Anti-corruption	Not engaging in any form of corruption, including fraud, embezzlement, money laundering, or abuse of power for personal or business gain.
Anti-money laundering	Not engaging in or facilitating money laundering, terrorism financing, or any illegal financial activities.
Conflict of Interest	A situation arising where there may be a conflict between the supplier's interests and its dealings with Brightwater. Conflicts of interest may be actual, or be perceived to exist, or potentially exist at some time in the future.



Health and safety	The commitment and responsibility of suppliers to provide a safe and healthy work environment for their employees, contractors, and other stakeholders.
Modern slavery	Modern Slavery is defined by the Commonwealth Modern Slavery Act 2018 (as serious exploitation, where offenders use coercion, threats or deception to exploit victims and undermine their freedom. This includes human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage and the worst forms of child labour.
Supplier	A supplier provides goods (products, raw materials) and services to Brightwater.

4. ROLES AND RESPONSIBILITIES

Role	Responsibility
Brightwater Procurement Manager	<ul style="list-style-type: none"> • Ensure that all Suppliers are aware of Brightwater's requirements under this policy; • the overall engagement and management of Brightwater's Suppliers • manage any breaches of this policy by Brightwater's Suppliers • the administration, maintenance and operational enforcement of this policy; • monitoring compliance with this policy and ensuring risk mitigation systems are reviewed; and • ensuring reasonable resources are allocated for implementation and ongoing maintenance.
Chief Financial Officer	<ul style="list-style-type: none"> • the development, implementation and maintenance of this Supplier Code of Conduct, ensuring that the Code is followed and that it remains up-to-date and relevant.
Suppliers to Brightwater	<ul style="list-style-type: none"> • meet the expectations of this Supplier Code

5. RELATED DOCUMENTS AND SUPPORTING INFORMATION

The following documents are related to this Supplier Code of Conduct:

- Brightwater's General Services Agreement (*accessible on Brightwater's website*)
- General Supply of Goods Agreement (*accessible on Brightwater's website*)
- Brightwater's Privacy Policy (*accessible on Brightwater's website*)
- Brightwater's Information Security Policy (*accessible on Brightwater's website*)
- Brightwater's Integrity Screening Policy

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6. APPROVAL DETAIL

Policy Custodian	Procurement & Contracts Manager			
Policy Owner	Chief Financial Officer		Policy Owner Approval Date:	23/04/2025
Sub-Committee:	Policy Control SC		Date of SC endorsement:	09/05/2025
Authorised to Publish by:	Chief Policy Controller	Date of Chief Policy Controller Authorisation: 18/05/2025		
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