

ENERGY BAY GROUP Supplier and Construction & Delivery Partner Code of Conduct

1 Scope and Purpose

- 1.1 The Energy Bay Supplier and Construction & Delivery Partner Code of Conduct (Code) set out the minimum standards of conduct and performance required of all Suppliers and Construction & Delivery Partners of Energy Bay Group Pty Ltd and its subsidiary entities (together, Energy Bay).

This includes, but is not limited to, suppliers of goods and services, contractors, subcontractors, agents, representatives, and Construction & Delivery Partners engaged in construction, operations, and project delivery activities on behalf of Energy Bay.

The Code defines Energy Bay's expectations in relation to ethical conduct, health and safety, environmental responsibility, and responsible business practices.

Compliance with this Code is a condition of engagement and of ongoing business with Energy Bay.

When Energy Bays works with its partners, we prioritise, and expect them, to prioritise the following values:

- (a) Zero harm - Energy Bay care for the wellbeing of its people, customers and environment. 100% accountable
- (b) Enduring Solutions - Energy Bay continuously challenge processes & technology to provide sustainable solutions for our customers.
- (c) Customer Driven - Energy Bay are focused on delivering value to its customers and stakeholders.
- (d) Trusted Partner – Energy Bay values its relationships and builds trust on delivering to our commitments.

- 1.2 Energy Bay engages Suppliers and Construction & Delivery Partners of varying risk profiles, maturity levels, and strategic importance.

Accordingly, this Code establishes tiered expectations that apply to Third Parties based on the nature, risk, and impact of their engagement.

For the purposes of this Code, "Third Parties" refers collectively to all Suppliers and Construction & Delivery Partners, including contractors, subcontractors, agents, and representatives engaged by Energy Bay.



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Tiered Requirements Under the Code:

At a Minimum (AM)

- (a) Mandatory standards that apply to all Suppliers and Construction & Delivery Partners.
- (b) Compliance with “At a Minimum” requirements is non-negotiable and a condition of engagement with Energy Bay.

Expected (EX)

Additional standards that apply to Suppliers and Construction & Delivery Partners assessed as higher risk or higher impact, having regard to factors such as:

- (c) nature of goods, services, or works performed
- (d) location and operating environment
- (e) workforce profile and subcontracting arrangements
- (f) scale, duration, and criticality of the engagement

“Expected” requirements may be applied following a risk-based assessment and form part of Energy Bay’s ongoing supplier and partner oversight.

Encouraged (EN)

Leading-practice standards that Energy Bay encourages all Suppliers and Construction & Delivery Partners to adopt.

Where appropriate, Energy Bay may work with selected Third Parties to progressively implement these practices over a reasonable and proportionate timeframe.

2 Standards

2.1 Governance

Energy Bay recognises that Third Parties will have differing sustainability maturity levels, opportunities, and challenges depending on their size, sector, and role in Energy Bay’s operations.

Energy Bay expects Third Parties to have governance arrangements and risk management practices that are appropriate to their business and that support the identification, management, and mitigation of relevant sustainability risks. Oversight of relevant policies and practices should be supported by senior management, with mechanisms in place to support ongoing improvement over time.



(a) At a Minimum (AM)

- (i) The Third Party commits to comply with the responsible procurement and conduct expectations set out in this Code and completes required onboarding questionnaires.
- (ii) The Third Party conducts its business in compliance with all applicable laws and regulations and has basic governance and risk management practices in place that are relevant to its activities.

(b) Expected (EX)

- (i) The Third Party has established a structured approach to identifying, assessing, and managing its most significant sustainability risks and opportunities, proportionate to its size, risk profile, and the nature of its engagement with Energy Bay.

Governance arrangements are in place to ensure appropriate senior management oversight of relevant sustainability, ethical, and risk management policies and frameworks.

2.2 Quality Assurance

Energy Bay seeks to work with Third Parties that deliver products and services in accordance with agreed requirements and maintain appropriate quality assurance practices.

Quality management practices should be proportionate to the nature, scale, and risk of the products or services provided and support continuous improvement over time.

(a) At a Minimum (AM)

- (i) The Third Party has basic quality assurance practices in place to ensure that products and services meet agreed requirements, including documented procedures, policies, or work instructions relevant to its activities.

(b) Expected (EX)

- (i) The Third Party has implemented a quality management system or structured quality framework that is appropriate to its operations and supports consistent delivery, monitoring, and continuous improvement.

(c) Encouraged (EN)

- (i) The Third Party maintains a quality management system that is externally certified against a recognised international



standard (e.g. ISO 9001) or an equivalent industry-recognised certification, where applicable.

2.3 Work Health and Safety (WHS)

Energy Bay seeks to work with Third Parties that prioritise the health, safety, and wellbeing of workers throughout their operations and supply chains.

Third Parties are expected to maintain Work Health and Safety (WHS) arrangements that are proportionate to the nature, scale, and risk of their activities, and that support compliance with applicable WHS laws and the prevention of work-related injury and illness.

(a) At a Minimum (AM)

- (i) The Third Party complies with all applicable Work Health and Safety (WHS) laws and regulations in the jurisdictions in which it operates.
- (ii) The Third Party promptly notifies Energy Bay of any notifiable incidents, serious injuries, fatalities, or high-potential safety incidents arising in connection with work performed for Energy Bay, in accordance with applicable legal requirements and contractual obligations.

(b) Expected (EX)

- (i) The Third Party has a documented WHS policy or equivalent and ensures workers are aware of, and understand, their WHS rights and responsibilities.
- (ii) The Third Party has implemented a WHS management system appropriate to its operations, including processes for hazard identification, risk management, incident reporting, and worker consultation.
- (iii) The Third Party monitors WHS performance and provides appropriate training, supervision, and protective measures to support a safe working environment.

(c) Encouraged (EN)

- (i) The Third Party sets and monitors WHS performance objectives or targets relevant to its operations.
- (ii) The Third Party maintains a WHS management system that is externally certified against a recognised international or industry standard (e.g. ISO 45001), where applicable.



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2.4 Environment and Sustainability

Energy Bay seeks to work with Third Parties that are actively managing and, where practicable, reducing the environmental impacts of their activities.

Environmental management practices should be proportionate to the nature, scale, and risk of the products or services provided and support improved efficiency, responsible resource use, and the prevention of environmental harm.

(a) At a Minimum (AM)

- (i) The Third Party complies with all applicable environmental laws and regulations in the jurisdictions in which it operates.
- (ii) The Third Party promptly notifies Energy Bay of any notifiable environmental incidents or regulatory breaches arising in connection with work performed for Energy Bay, in accordance with applicable legal and contractual requirements.

(b) Expected (EX)

- (i) The Third Party has a documented environmental management policy or equivalent and ensures that relevant workers are aware of and understand it.
- (ii) The Third Party has implemented an environmental management system or structured practices appropriate to its operations to identify, manage, and mitigate material environmental risks.
- (iii) The Third Party takes reasonable steps to minimise environmental harm in its operations, including through initiatives to reduce waste, conserve water, reduce greenhouse gas emissions, and manage air, land, and water impacts, where relevant.

(c) Encouraged (EN)

- (i) The Third Party maintains an environmental management system that is externally certified against a recognised international or industry standard (e.g. ISO 14001), where applicable.
- (ii) The Third Party sets and monitors environmental performance objectives or targets relevant to its activities.
- (iii) Where relevant to its role and influence, the Third Party has a framework or strategy to assess and manage significant



sustainability risks and opportunities, including consideration of environmental impacts within its supply chain.

2.5 Modern Slavery

Energy Bay seeks to work with Third Parties that act responsibly to prevent modern slavery, forced labour, and human trafficking within their operations and supply chains.

Expectations relating to modern slavery are applied on a risk-based and proportionate basis, recognising differences in size, sector, geographic exposure, and the nature of goods or services provided.

(a) At a Minimum (AM)

- (i) The Third Party complies with all applicable modern slavery and human rights laws in the jurisdictions in which it operates, including the Australian Modern Slavery Act 2018 (Cth), where applicable.
- (ii) The Third Party does not knowingly engage in, support, or benefit from modern slavery practices and takes reasonable steps to identify and address such risks where they may arise in connection with work performed for Energy Bay.

(b) Expected (EX)

- (i) The Third Party has a documented modern slavery policy or equivalent statement and ensures that relevant workers are aware of, and understand, its commitments.
- (ii) The Third Party has identified key (Tier One) suppliers relevant to its engagement with Energy Bay and has taken steps to assess modern slavery risks associated with key products, services, or labour arrangements.
- (iii) The Third Party has processes appropriate to its operations to assess modern slavery risks in new or prospective suppliers and provides a mechanism for workers to report suspected modern slavery or labour exploitation concerns.

(c) Encouraged (EN)

- (i) Where relevant and proportionate, the Third Party progressively maps higher-risk areas of its supply chain beyond Tier One suppliers.
- (ii) The Third Party provides modern slavery awareness training to relevant employees or workers.



- (iii) The Third Party works collaboratively with Energy Bay to improve transparency, traceability, and risk mitigation across extended supply chains, particularly in higher-risk categories.

2.6 Ethical Business Conduct

Energy Bay supports procurement activities and Third Party relationships that promote high standards of ethical behaviour, integrity, and fair operating practices. This includes acting honestly and transparently, using fair contractual practices, and preventing fraud, conflicts of interest, bribery, corruption, and anti-competitive behaviour.

(a) At a Minimum (AM)

- (i) The Third Party conducts its business in compliance with all applicable laws and regulations relating to ethical conduct, fair trading, competition, and anti-bribery and corruption.
- (ii) The Third Party does not engage in fraudulent, corrupt, deceptive, or anti-competitive practices in connection with its engagement with Energy Bay.

(b) Expected (EX)

- (i) The Third Party has a documented ethical business conduct policy or equivalent that addresses, at a minimum, fair trading practices, conflicts of interest, and anti-bribery and corruption.
- (ii) The Third Party takes reasonable steps to ensure that relevant employees, workers, or representatives are aware of, and understand, expected standards of ethical conduct and how to raise concerns.

2.7 Human Rights

Energy Bay seeks to work with Third Parties that respect and support fundamental labour and human rights within their operations and supply chains.

Human rights expectations are applied on a risk-based and proportionate basis, recognising differences in size, sector, geographic exposure, labour arrangements, and the nature of goods or services provided.

(a) At a Minimum (AM)

- (i) The Third Party complies with all applicable labour, employment, and human rights laws and regulations in the jurisdictions in which it operates.



- (ii) The Third Party does not engage in, support, or benefit from practices that infringe basic labour or human rights, including unlawful discrimination, forced labour, child labour, or unsafe working conditions.

(b) Expected (EX)

- (i) The Third Party has a documented human rights or labour standards policy, or equivalent, and takes reasonable steps to ensure that relevant workers are aware of, and understand, expected standards of conduct.
- (ii) The Third Party provides fair remuneration and working conditions in accordance with applicable laws and industry standards.
- (iii) The Third Party has processes appropriate to its operations to identify and assess material labour and human rights risks within its operations and, where relevant, its supply chain.
- (iv) The Third Party provides a mechanism for workers to raise concerns or grievances relating to employment conditions or human rights issues, confidentially and without fear of retaliation.

(c) Encouraged (EN)

- (i) Where relevant and proportionate, the Third Party aligns its practices with internationally recognised labour standards, such as the principles set out in the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work.
- (ii) The Third Party works collaboratively with Energy Bay to improve transparency, traceability, and risk mitigation relating to labour and human rights impacts within extended supply chains

3 Declaration

The undersigned confirms, on behalf of the relevant supplier, contractor, or Construction & Delivery Partner (the Third Party), that it:

- (a) Has read and understood the Energy Bay Supplier & Construction Partner Code of Conduct and commits to working collaboratively with Energy Bay to meet the expectations set out in the Code.



ENERGY BAY

- (b) Will complete and submit required questionnaires and provide reasonable evidence of compliance with the Code upon request.
- (c) Will engage with Energy Bay in good faith to support the continuous improvement of sustainability, ethical, safety, and responsible business outcomes, where applicable.
- (d) Will participate in periodic reviews of compliance with the Code, as reasonably required by Energy Bay, to support ongoing alignment and improvement.
- (e) Confirms that the undersigned is duly authorised to act on behalf of the Third Party. Submission of this declaration constitutes acknowledgement and acceptance of the expectations set out in the Code as a condition of doing business with Energy Bay Group Pty Ltd and its subsidiaries and controlled entities, including Quad Sol Pty Ltd and Diamond Energy Pty Ltd (together, Energy Bay).

Email Address to Receive a Copy of the Submission:	
Legal Entity Name:	
Name of Authorised Signatory:	
Role of signatory:	
Signature:	
Date Signed:	

