

Supplier Code of Conduct

This code applies to all suppliers, subcontractors, consultants, labour providers, agents, carriers, and any other third-party engaged by Fleetwood Limited and each of its subsidiaries ("Fleetwood") in the supply of goods, materials, equipment, or services ("Suppliers").

1. Purpose and scope

This Supplier Code of Conduct ("Code") sets minimum standards for ethical business practices, workplace conduct, health, safety, environmental stewardship and integrity. It applies to all tiers of the Supplier's operations related to Fleetwood contracts. Suppliers must flow down these obligations to their subcontractors and ensure compliance across their supply chains

The most current version of this Policy will be located on the intranet.

2. Health, safety and wellbeing (HSE)

Fleetwood expects a safety-first approach, where all work is planned and executed to protect people, prevent incidents, and ensure safe outcomes. Suppliers must:

- Maintain an HSE management system aligned to recognised standards.
- Ensure all workers are properly trained, licensed, and competent.
- Implement controls for high-risk activities (heights, lifting, electrical, confined spaces, excavations, mobile plant, etc.).
- Provide adequate PPE and enforce Fleetwood site rules.
- Manage fatigue, drugs and alcohol, and psychosocial safety.
- Report all incidents, hazards and near misses immediately.
- Cooperate with investigations and corrective actions.

3. Legal and regulatory compliance

Suppliers must comply with all applicable laws, regulations, approvals, permits, licences, and site rules, including but not limited to:

- Workplace health and safety, construction safety, and incident reporting.
- Labour, immigration, wages, and modern slavery laws.
- Environmental protection, waste regulations and sustainability legislation.
- Competition/antitrust, privacy and data protection laws.
- Relevant building codes, product conformity, and certification.

4. Ethical business conduct & anti-corruption

Suppliers must:

- Prohibit and not engage in behaviour which constitutes bribery, kickbacks, facilitation payments, collusion and fraud.
- Ensure any gifts/hospitality are modest, lawful, and not intended to influence.
- Disclose any conflicts of interest to Fleetwood.
- Maintain accurate, auditable books and records.
- Support the whistleblowing framework outlined in Fleetwood's Speak Up Policy, which is accessible on Fleetwood's website or available upon request.

5. Labour and human rights

Suppliers must:

- Prevent forced labour, coercion, or retention of worker documents.
- Prohibit child labour.
- Pay lawful wages with transparent payslips.
- Comply with applicable working hours and leave entitlements.
- Honour freedom of association where permitted.
- Ensure non-discrimination and inclusion.
- Maintain confidential grievance mechanisms with non-retaliation protections.

6. Modern slavery and ethical recruitment

Suppliers must comply with, and operate in alignment with, Fleetwood's Modern Slavery Policy, which forms part of this Code and is available via Fleetwood's website or upon request. In addition, suppliers must:

- Conduct due diligence to identify and mitigate modern slavery risks.
- Provide written terms of employment in workers' native language.
- Prevent debt bondage, forced labour, and exploitation.
- Immediately notify Fleetwood of any actual or suspected modern slavery indicators.
- Support Fleetwood in meeting its obligations under the Modern Slavery Act 2018 (Cth) and any equivalent legislation.

7. Environment and sustainability

Suppliers must:

- Maintain an environmental management system.
- Comply with environmental approvals and heritage protections.
- Prevent pollution and manage spills, dust, noise and stormwater.
- Reduce energy, water, waste, and emissions where practicable.
- Segregate and lawfully dispose of waste.
- Protect environmentally sensitive and culturally significant areas.
- Meet sustainability standards as specified by Fleetwood.
- Provide sustainability data to Fleetwood on request to meet legal, customer or project requirements.

8. Community, cultural heritage and social value

Suppliers must:

- Respect local communities and minimise disruption.
- Comply with cultural heritage protections and protocols.
- Support diverse employment (including but not limited to indigenous participation and local employment) where possible and as required by Fleetwood.
- Respond promptly to community concerns or complaints.

9. Subcontractor management and flow-down

Suppliers must:

- Prequalify and monitor subcontractors.
- Flow down all obligations in this Code to subcontractors.
- Ensure adequate supervision, toolbox talks, and oversight.
- Address subcontractor non-compliance promptly.

10. Acknowledgement

By accepting a purchase order, subcontract, or supplying goods/services to Fleetwood, the Supplier acknowledges and agrees that:

- It will comply with this Supplier Code of Conduct.
- It will ensure all subcontractors and supply chain partners also comply.
- It will promptly notify Fleetwood of any material breaches.

11. Review

This Policy will be reviewed at least every two (2) years to ensure it meets industry good practice standards and the needs of Fleetwood.