

# Supplier Code of Conduct

Jan 2023



Progressive Green Pty Ltd (trading as Flow Power) and its related entities (together, the “Flow Group”) are firmly committed to conducting business with the highest level of integrity and in compliance with legislative requirements and international agreements.

This Supplier Code of Conduct (“Code”) outlines the Flow Group’s expectations of Suppliers with whom it conducts business (including their affiliates or subsidiaries) with respect to responsible ethical, social, labour and environmental practices.

Where this Code refers to “Suppliers” this means suppliers, vendors and contractors that provide goods and or services to the Flow Group, or its related entities either directly or indirectly.

All Suppliers are expected to comply with this Code and communicate this within their own supply chains. All Suppliers must educate their representatives to ensure they understand and comply with this Code.

## Labour and Human Rights

Flow Group is fundamentally committed to ensuring that there is no slavery or human trafficking in its supply chain or in any part of the business.

Flow Group requires Suppliers to consider the risks of Modern Slavery practices in their operations and supply chains and identify these where they are found to exist.

In respect to conditions of employment, in addition to any other legislative obligations, Suppliers must comply with the following specific requirements:

<b>MODERN SLAVERY</b>	<p>Suppliers must:</p> <ul style="list-style-type: none"><li>• comply with all relevant modern slavery laws and regulations;</li><li>• make all reasonable efforts to ensure their operations and supply chains are free from child labour or harsh or inhumane treatment including torture, physical and psychological abuse, slavery, servitude, trafficking of persons or forced marriage;</li><li>• make all reasonable efforts to ensure their operations and supply chains are free from deceptive recruiting practices, forced, bonded, prison or involuntary labour. All work must be voluntary and workers shall have the right to terminate their employment at any time without penalty, by giving reasonable notice;</li><li>• not require employees to submit deposits or government-issued identity documents (such as passports) to be held as a condition of employment;</li><li>• comply with modern slavery obligations set out in their contracts with Flow Group; and</li><li>• take measures to identify and mitigate modern slavery risks along their supply chain and in their operations.</li></ul>
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<b>EMPLOYMENT RELATIONSHIP</b>	<p>Suppliers must:</p> <ul style="list-style-type: none"> <li>• comply with all relevant labour laws and regulations, including providing workers with legally recognised employment relationships and giving workers their legal entitlements with respect to pay and working conditions;</li> <li>• provide workers with written contracts of employment must be in a language they understand;</li> <li>• when the subcontracting of recruitment and hiring is necessary, ensure that the labour agencies they engage operate legally, are certified or licensed by the competent authority, do not engage in fraudulent behaviour that places workers at risk of forced labour or trafficking for labour exploitation;</li> <li>• ensure that they do not employ anyone under the local legal minimum age for work or mandatory schooling, whichever is higher; and</li> <li>• provide workers with access to: i) a grievance mechanism without fear of retaliation, intimidation, harassment, discrimination or victimisation, and ii) Flow Group's Independent Whistleblower Service.</li> </ul>
<b>DISCRIMINATION</b>	<p>Suppliers must:</p> <ul style="list-style-type: none"> <li>• comply with applicable workplace laws in respect of discrimination, harassment and bullying in their supply chain and operations; and</li> <li>• have and uphold reasonable standards of behaviour in the workplace which apply to all workers and demonstrate an inclusive and respectful workplace, valuing diversity with no discrimination on the basis of race, caste, religion, nationality, age, gender, marital status, sexual orientation, disability, union membership or political affiliation.</li> </ul>
<b>FREEDOM OF ASSOCIATION</b>	<p>Suppliers must ensure that workers have the right of freedom to move and associate, including collective bargaining, the right to join or form trade unions (unless prohibited by legislation), and no requirement or pressure to surrender government issued identification, passports or work permits.</p>

## Environment

Flow Group is committed to limiting any harmful impacts of its operations on the environment and to prevent pollution. Suppliers must minimise their environmental impact in the way they conduct business and encourage others to do so. Flow Group expects its supply chain to ensure compliance with relevant environmental legislation, industry standards and codes, together with any necessary environmental permits and registrations.

## Health and Safety

Flow Group expects its Suppliers to share its commitment to workplace health, safety and the wellbeing of employees and others who could be affected by their activities, by implementing robust policies and procedures and complying with relevant laws in respect of Work Health and Safety. Suppliers must ensure that their workers are adequately trained and have the correct equipment to do their jobs.

## Fraud, bribery and corruption

Flow Group is committed to the highest standards of probity and accountability with regards to anti-bribery, corruption and ethical conduct. Flow Group expects its Suppliers to employ reasonable measures to ensure that their workers and suppliers do not commit fraud, bribery or corruption, or become involved in such activities.

## Performance of this Code

Flow Group expects its Suppliers to commit to collecting and reporting information on its performance of the Code, including being cooperative with any Flow Group inspection or audit. Where Suppliers cannot meet the expectations of the Code, it must explain its reasons and any plans to address those reasons.

## Reporting Concerns

Flow Group asks anyone with whom it conducts business, including Suppliers, who has serious concerns about any of the issues detailed in this Code, to come forward at the earliest opportunity. You can make a report via our independent whistleblowing service provider, Stopline, as detailed below.

### Stopline – Flow Power’s Independent Whistleblower Service

**Phone:** 1300 30 45 50 (in Australia)  
+61 3 9811 3275 (from outside of Australia – note that this is a reverse-charges line)

**Fax:** Flow Power, C/- Stopline +61 3 9882 4480

**Email** [flowpower@stopline.com.au](mailto:flowpower@stopline.com.au)

**Online:** <https://flowpower.stoplinereport.com>

**Mail:** Flow Power, C/- Stopline  
PO Box 403  
Diamond Creek Vic 3089

**App:** Smart phone App – ‘Stopline365’ (free download from Apple iTunes and Google Play)