



**ILUKA**

**SUPPLIER  
CODE OF  
CONDUCT**

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JUNE 2022

At Iluka, our values of integrity, respect, courage, accountability and collaboration form the basis of the way we interact with our customers, suppliers and each other.

Our expectation is that Iluka's suppliers and their employees, related entities and supply chains similarly operate in a legal, ethical and socially responsible way. This Supplier Code of Conduct (**Code**) outlines the minimum standards we expect our suppliers to meet and aim to exceed. Further information on Iluka's Procurement Policy is available [here](#).

## WHO DOES THIS CODE APPLY TO?

This Code applies to Iluka's procurement activities. A reference to "supplier", "you" or "your" is a reference to any person or entity that supplies goods and/or services to Iluka and their respective personnel, related entities, suppliers, agents and subcontractors. A reference to "we" or "our" is a reference to Iluka Resources Limited and its related entities.

We expect all existing and new suppliers to meet or exceed the minimum standards outlined in this Code. Suppliers are encouraged to communicate the substance of this Code to their personnel, related entities, suppliers, agents and subcontractors and support them in understanding and complying with this Code by maintaining appropriate policies and procedures.

Any questions on how this Code applies to any procurement activity should be discussed with your Iluka representative.

## 1. ETHICAL BUSINESS PRACTICES

Iluka is committed to being transparent, acting ethically and conducting its business in accordance with the highest standards of corporate governance. Iluka therefore has zero tolerance for bribery or corruption in its business, including its supply chains. We do not tolerate the payment of facilitation payments.

We expect all suppliers who work with or for Iluka to:

- comply with all relevant laws and regulations in the country where the supplier operates, including laws relating to anti-bribery and corruption;
- familiarise themselves with and comply with Iluka's [Anti-Bribery and Corruption Policy](#);
- be alert for instances of corrupt conduct and report suspected or actual breaches;
- ensure that bribes, facilitation payments and inappropriate inducements are not requested, accepted, offered or given;
- avoid conflicts of interest that may arise in the performance of work for Iluka and in your related business decisions; and
- report any actual or perceived conflicts of interest to Iluka and where appropriate seek Iluka's consent before proceeding.

## 2. PEOPLE

### HEALTH AND SAFETY

Iluka is committed to providing a safe environment for all workers by implementing safe systems of work, providing appropriate training where required and supporting individuals to raise concerns. The health and wellbeing of our people is important, and we seek to identify and manage occupation exposure risks, minimise occurrences of occupational illness and injury and promote healthy lifestyles.

We expect all suppliers who work with or for Iluka to:

- comply with all relevant workplace health and safety laws and regulations, including regularly reviewing and managing workplace hazards;
- familiarise themselves with and comply with Iluka's [Health, Safety, Environment and Community Policy](#);
- provide a safe workplace for all workers and take reasonable steps to identify workplace hazards, eliminate or minimise the risk of workplace injury, illness and disease, implement safe systems of work and provide appropriate training for staff and visitors; and
- ensure personnel are fit for work and free from the influence of alcohol and drugs at Iluka sites.

### DIVERSITY AND INCLUSION

Iluka respects, encourages and values diversity and inclusion in our workforce. All suppliers who work with or for Iluka are expected to treat everyone with dignity and respect. This includes maintaining a positive working environment in accordance with Iluka's [Diversity and Inclusion Policy](#) (or equivalent supplier policy where applicable).

### 3. ENVIRONMENT AND COMMUNITY

#### ENVIRONMENT

Iluka's approach to environmental stewardship is based on understanding and minimising the potential impact of our operations on the environment. We focus on using resources efficiently and achieving positive closure outcomes.

We expect all suppliers who work with or for Iluka to:

- comply with all relevant local and national environmental laws and regulations, including in relation to environmental management and reporting; and
- assess and manage the environmental impacts associated with their activities and where identified take reasonable steps to manage them effectively.

#### SOCIAL PERFORMANCE

At Iluka our social performance is based on understanding and minimising the potential impacts of our activities on communities and managing social risks to the business. We seek to respect human rights, engage meaningfully with stakeholders and to make a positive difference to the social and economic development of the communities in which we operate.

Consistent with this, Iluka expects all suppliers who work with or for Iluka to support Iluka in:

- addressing location or project-specific social considerations such as cultural heritage management, human rights, local employment and procurement and resettlement;
- undertaking meaningful engagement with stakeholders;
- identifying, managing and monitoring social impacts and risks;
- responding to and appropriately managing grievances;
- sharing benefits with local communities; and
- acknowledging and respecting the histories, cultures, customs and values of Indigenous peoples and communities.

### 4. HUMAN RIGHTS AND MODERN SLAVERY

Iluka is committed to upholding and respecting human rights and identifying and addressing the risks of modern slavery practices within its business and supply chains. This commitment is further detailed in Iluka's [Human Rights Policy](#). Iluka is also committed to meeting its commitments under the *Modern Slavery Act 2018* (Cth).

#### HUMAN RIGHTS

We expect all suppliers who work with or for Iluka to:

- comply with all relevant local and national human rights laws and regulations;
- be guided more broadly by the United Nations Guiding Principles on Business and Human Rights;
- comply with international human rights law as set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work;
- familiarise themselves with and comply with Iluka's [Human Rights Policy](#), Iluka's [Diversity and Inclusion Policy](#) and [Whistleblower Policy](#);
- ensure all employment is freely chosen and that you do not use any form of forced, bonded, compulsory labour, slavery or human trafficking in any part of your business operations; and
- not tolerate or use child labor in any stage of your activities other than in accordance with all applicable laws and regulations.

#### LABOUR RIGHTS

We expect all suppliers who work with or for Iluka to:

- comply with all relevant labour laws and regulations, including giving workers their legal entitlements with respect to wages, working hours and workers compensation insurance;
- respect the workplace rights and entitlements of workers, including freedom of association, right to collective bargaining, and right to form, join and administer workers' organisations;
- communicate all relevant employment conditions clearly to workers, including providing employment contracts in relevant languages for workers where appropriate;
- provide fair pay and working conditions for employees, including meeting minimum wage requirements and without unauthorised or disciplinary measure deductions; and
- allow workers to leave their employment after reasonable notice, ensure workers are not charged recruitment fees or require workers to lodge deposits or identity papers.

## 5. RESPECTING PRIVACY AND PROTECTING CONFIDENTIAL INFORMATION

Iluka recognises the importance of privacy and is committed to protecting personal information. Iluka's [Privacy Policy](#) outlines Iluka's privacy commitment and explains how it collects, uses and manages personal information. Additionally, Iluka is committed to protecting its intellectual property (including confidential information) and similarly respecting the intellectual property rights of others.

We expect all suppliers who work with or for Iluka to:

- respect and comply with applicable privacy laws, including managing personal information appropriately;
- comply with all privacy, data security and confidentiality obligations specified in contracts with Iluka; and
- ensure the intellectual property rights of others (patents, trademarks, copyright and confidential information) are respected.

Suppliers must report any unauthorised use or disclosure of Iluka confidential or proprietary information, including where access to such information has been given in error, as soon as reasonably practicable.

## 6. SUPPLIER COMMITMENT

Suppliers who work with Iluka share our commitment to responsible, sustainable and ethical procurement and are aligned to the principles raised in this Code. Suppliers are expected to develop, implement and maintain policies consistent with this Code and encourage their respective suppliers, agents and subcontractors to do the same.

## 7. COMPLIANCE WITH THIS CODE OF CONDUCT

Iluka may at any time review or audit a supplier's performance against this Code. This may include verification via supplier self-assessments (Supplier Questionnaires), requests for further information, desktop reviews or onsite audits. Iluka expects suppliers to co-operate in good faith and provide information, documents and access to personnel, including in relation to your supply chain and agents, as Iluka requires.

We expect all suppliers who work with or for Iluka to:

- monitor their performance with this Code and provide information to Iluka on request about such performance with this Code;
- provide personnel with access to Iluka's [Whistleblower Policy](#); and
- report actual or suspected breaches of this Code and where appropriate, implement remediation actions to achieve compliance with this Code.

## 8. REPORTING CONCERNS

If a supplier becomes aware or suspects a breach of this Code, the supplier must inform its Iluka representative or alternatively can report the matter using Iluka's external independent whistleblower service STOPline.

STOPline may be contacted by website: <https://ilukaresources.stoplireport.com>, email: [ilukaresources@stipline.com](mailto:ilukaresources@stipline.com) or phone: +61 429 450 799.

STOPline operators are not associated with Iluka, and are trained specialists in dealing with whistleblower matters.

For further information on concern reporting, please refer to Iluka's [Whistleblower Policy](#).



**Tom O'Leary**  
Managing Director and CEO  
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