Summit Rural (WA) Pty Ltd Corporate Social Responsibility (CSR)
Action Guidelines for Suppliers

Summit Rural (WA) Pty Ltd (Summit) is committed to making positive economic, social and environmental contributions to society, while complying with all applicable laws and regulations.

We can only achieve these objectives by setting clear standards which guide our decision making and hold all employees accountable. It is equally important that we align with companies who value similar goals and adhere to the same standards in all transactions.

Action guidelines for Summit suppliers:

1. Respect human rights and not to be complicit in human rights abuses
   Business plays an important role in respecting and promoting human rights and eradicating modern slavery. Human rights abuses refer to acts stated in 2 to 4 below, in addition to mistreatment, physical punishment, sexual harassment and other inhumane treatment.

2. Prevent forced labour, child labour and the payment of unfairly low wages
   Compliance to the local laws and regulations, such as Australian Modern Slavery Act 2018, is expected as a bare minimum. Suppliers are encouraged to exceed minimum standards and promote best practice and continuous improvement. Modern Slavery includes crimes such as human trafficking, slavery and slavery like practices such as servitude, forced labour, debt bondage and the sale and exploitation of children.

   Child labour generally refers to employing persons who have not reached the minimum working age specified by the International Labour Organization (ILO) or the laws and regulations of the country of operation, as well as neglecting to protect young workers.

   Payment of unfairly low wages refers to the payment of wages that are below the minimum wages specified by the wage laws and regulations of the country of operation. Wages include payment of other allowances, such as overtime compensation and statutory benefits.

3. Not engage in discriminatory employment practices
   Discrimination refers to being biased in providing employment, promotion, remuneration and training opportunities due to factors other than those that are reasonable, such as one’s abilities, competence or performance. Factors that could be involved in discriminatory practices include race, ethnicity, nationality,
origin, colour, age, gender, sexual orientation, disability, religion, political affiliation, union membership, and marital status.

In addition to compliance of any laws and regulations regarding discrimination, being proactive to ensure diversity by fostering an inclusive culture and ensuring diverse representation among employees will increase morale and commitment and benefit the whole company.

4. **Respect the rights of employees to associate freely in order to ensure open and fair negotiations between labour and management**

To respect the rights of employees to associate freely refers to giving consideration to employees’ freedom to associate, freedom to join a trade union in accordance with laws and regulations, freedom to take industrial action, and freedom to join a workers’ council, without being subject to reprisal, intimidation or harassment. As a means of facilitating negotiations between labour and management on work environments, wage standards and other issues, the laws and regulations on the freedom of association and the right to collective bargaining in each country should be observed and employees’ rights to these practices should be respected.

5. **Provide employees with safe and healthy work environments**

Laws and regulations on health and safety in each country should be observed to provide safe and healthy work environments. Areas which would be covered would include: safety measures and instructions for machinery and equipment; the provision of a safe and healthy work environment; proper measures against occupational injuries and illness; an emergency plan in place for any major health and safety issue; consideration for tasks involving physical loads; facilities’ safety and sanitation requirements by law met and a proactive approach to employee health management.

Employees’ work hours, days off and leave should be managed properly in compliance with the laws and regulations of each country.

6. **Protect the global environment and give due consideration to biodiversity**

Protection of the global environment includes giving due consideration to all relevant environmental issues of the country which may have a global impact, such as climate change. There should be compliance with all environmental laws and regulations. In addition, actions should be taken to be proactive in addressing environmental issues such as reducing greenhouse gas emissions; ensuring the effective use of resources, water and energy; reduction, reuse and recycling of waste; proper management of chemical substances; prevention of pollution caused by effluents, sludge or exhaust.

7. **Ensure fair business transactions, to abide by all applicable laws, rules and regulations, and to prevent extortion, bribery and all other forms of corrupt business practices**

Businesses should operate and act in an ethical manner, consistent with principles of honesty, integrity, fairness and respect. There should be total compliance with all anti-bribery and corruption laws, such as
the Australian Criminal Code or local country laws. These laws include items such as prohibition of abuse of a dominant bargaining position; prohibition of offering or receiving any inappropriate advantage; prohibition of any practice that restricts competition; provision of accurate product and service information; respect for intellectual property; proactive information disclosure and the development of systems for the prevention and early detection of misconduct.

8. **Ensure appropriate information security**
   Information assets should be managed and secured. Protection against attacks from external threats is of the upmost importance. Preventing leakage of personal information of customers or third parties by ensuring robust security of IT systems and conducting ongoing training and for employees. Compliance with all Data protection and Privacy laws is required.

9. **Cooperate with local communities and contribute to sustainable regional development**
   By engaging with and supporting the local community, a business is giving back. Activities that can contribute to society refer to activities that support communities and generally include the following initiatives:
   - Social contribution using the primary operations and skills of the company
   - Non-monetary social contribution using facilities and human resources
   - Social contribution with monetary donations
   Specific examples include cooperation with local communities in the event of a disaster, employees’ volunteer activities, donation activities, and disseminating and introducing information.