millennium

Supplier Code of Conduct & Approved Supplier Accreditation

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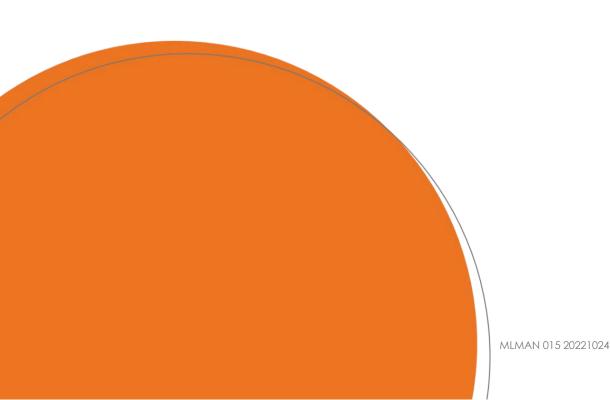


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SUPPLIER CODE OF CONDUCT

Purpose

Millennium Services Group Limited (Millennium) delivers lasting impressions by creating clean, safe and inviting environments on behalf of clients every day.

We seek to conduct business in a safe, accountable and ethical manner that is in compliance with all applicable laws, regulations and standards, including the Modern Slavery Act (2018) and is in alignment with the Ten Principles of the United Nations Global Compact of human rights, labour, environment and anti-corruption.

This Supplier Code of Conduct outlines our expectations of our suppliers and reflects our pledge to act transparently, respectfully and with integrity within all our business relationships.

Compliance with this Code is a requirement for conducting business with Millennium.

2 Scope

Millennium Services Group Limited (Millennium) and related entities provide the Supplier Code of Conduct to all suppliers (including contractors) of goods and / or services to Millennium.

Documentation

Suppliers are required to ensure that Millennium is provided with current documentation as requested during the Supplier pre-qualification process, including certificates of currency, licences and registers.

Corporate Governance and Ethics

Millennium seeks to engage suppliers who are shown to have strong governance frameworks and who adopt high ethical standards. Millennium's suppliers must comply with the following minimum requirements:

- Comply with all applicable laws and regulations including those relating to bribery, corruption and prohibited business practices
- Conduct business in an ethical, equitable and professional manner
- Ensure that their own supply chain and related third parties conduct their businesses in a fair, safe and ethical manner and complies to the Modern Slavery Act (2018)
- Ensure they meet their contractual obligations to us and their own suppliers
- Disclose any actual or potential conflicts of interest that they or any related party may have in relation to the goods or services being supplied
- Maintain a formal complaints management process for employees and members of the communities in which they operate or provide services to.

Anti-Bribery & Corruption

Millennium does not tolerate the giving or receiving of bribes, including the making of facilitation payments. It is expected that all partners/directors, employees, and consultants working, whether directly or indirectly for or on behalf of Millennium, comply with these principles in the performance of their services.

Millennium expects its Suppliers to comply with all applicable laws, statutes and regulations relating to anti-bribery and anti-corruption; including but not limited to state and commonwealth law, and to not engage in any activity, practice or conduct which would constitute an offence under such requirements. Millennium will not tolerate fraudulent or corrupt behaviour or engage in bribery or any form of unethical inducement or facilitation payments and will not tolerate any such behavior from Suppliers.

4.2 Labour Hire

Suppliers who fall within the designation of providing labour hire must ensure that they have appropriate licensing when providing labour to Millennium and/or the clients it represents, in accordance with the applicable state and commonwealth laws.

4.3 Confidentiality

It is incumbent on Millennium to protect the confidential information of everyone Millennium does business with including clients, employees and Suppliers. Suppliers must comply with all relevant laws and regulations governing confidential or proprietary information and safeguard all such information received by or from Millennium. Suppliers must ensure that such confidential information is only used for authorised purposes and only share such information with authorised persons. Suppliers must consult with Millennium regarding any uses of confidential information.

From time to time, Suppliers may have access to personal information about Millennium employees, its clients or others. Suppliers must treat this personal information properly and securely, regardless of how it is collected, recorded, stored, processed, disclosed, transferred and/or shared (whether on paper or in electronic format). Suppliers must comply with all applicable privacy and information security laws in relation to personal information.

4.4 Whistle Blowing

Millennium is committed to the highest standards of probity and accountability as regards antibribery, corruption and ethical conduct. Millennium expects its employees and anyone with whom it conducts business, including Suppliers, who have serious concerns about these issues, to come forward and voice those concerns.

Information regarding how to voice any concerns can be found in Millennium's Whistleblowing Policy which can be found by clicking the following link: https://millenniumsg.com/wp-content/uploads/2022/03/Whistleblower-Policy-Millennium-17022022.pdf

5 Risk Management

Millennium will prefer suppliers with comprehensive and documented risk management frameworks, which cover environmental, social and corporate governance risks. Millennium's suppliers must comply with the following minimum requirements:

 Suppliers must implement policies and practices aimed at identifying risks, vulnerabilities and compliance obligations and must facilitate risk awareness and mitigation within their business.

6 Health and Safety

Ensuring a safe working environment for workers, contractors and visitors to Millennium workplaces is of the utmost importance to Millennium. Millennium suppliers must comply with the following minimum requirements.

6.1 Minimum Standards

Suppliers must, in the conduct of any work for Millennium:

- Ensure that their employees, agents, contractors entering Millennium premises or workplaces behave in a safe manner, are properly trained, qualified and skilled, and are of such character as not to prejudice safe working practices, the safety and care of property, or the continuity of work
- Ensure workers are adequately supervised whilst undertaking contract work and work in accordance with the Safety Management Plan, Safe Work Method Statements and Safe Work Procedures
- Undertake a site-specific induction prior to work commencement
- Comply with all Millennium policies and procedures, training requirements and site requirements including sign in / out procedures and housekeeping standards
- Have all safety risk assessment documentation and worker licences and accreditation available at site for verification
- Ensure all plant and equipment onsite, including leads, are adequately maintained, fit for purpose, tested and tagged (where required) and in safe working condition
- Ensure that their employees always wear and use the required protective clothing and equipment (PPE) and are not under the influence of drugs or alcohol
- Report hazards or incidents to Millennium immediately or as soon as reasonably practicable
- Provide all such information and assistance, as Millennium reasonably requires in connection to any safety investigation
- Comply with monitoring arrangements including inspections and audits

6.2 Law. Codes and Standards

- Suppliers must comply with all relevant laws, codes and standards in the conduct of any work for Millennium.
- Suppliers must comply with all lawful direction given by Millennium representatives

Documented policies, standards and systems

Suppliers must develop and implement

- Written health and safety policies and standards; and
- Documented systems to record work-related injuries and illnesses

Prior to commencing work for Millennium, Suppliers must submit the following documentation for review and/or verification.

- Site and task specific risk assessment documentation for review and approval including Safe Work Method Statements, Job Safety Analysis and Safe Work Procedures. Requirements will vary depending on the services provided but may include but are not limited to:
 - Contractors Work Risk Assessment / JSEA
 - Services Isolation Request
 - Hot Work Permit
 - Confined Space Permit
 - Working at Height Permit
 - Warnina Signage
- A chemical register for review as required and ensure all relevant Safety Data Sheets are available to workers onsite
- A plant and equipment register including test and tag information as required
- Relevant worker licences and accreditations as applicable to the contract service
- Police check certificates for workers providing services on-site

7 Labour, policies, human rights and non-discrimination

Millennium aims to support responsible labour practices that contribute to a fair and inclusive workplace. Our practises align with the UN Global Compact and comply with relevant Australian human rights and modern slavery legislation. Millennium suppliers must comply with the following minimum requirements:

7.1 Forced and Child Labour

Suppliers must not use any form of forced or involuntary labour or child labour and must comply with all international standards and domestic regulations on the employment of children.

7.2 Equal rights and non-discrimination

Suppliers must operate in an inclusive workplace that is free from discrimination, harassment, bullying and other unlawful conduct.

Fair Wages, benefits and Conditions

Suppliers must comply with all applicable laws relating to wages, working hours and legally mandated benefits.

Suppliers shall allow Millennium the right to obtain wage information in relation to employees or subcontractor's employees on Millennium sites to ensure compliance with payroll laws and regulations.

7.4 **Legal Compliance and Workplace Policies**

Suppliers must comply with all relevant laws and regulations with regards to employment practices, benefits, health and safety and anti-discrimination.

Suppliers must have written workplace policies and standards that include equal opportunity, anti-discrimination, anti-harassment and anti-bullying principles.

Suppliers must have a written complaints and/or grievance policy and a whistle-blower policy

7.5 Right to Work in Australia

Suppliers must warrant their employees have the legal right to work in Australia and that their employment complies with any visa conditions and the laws of Australia and its states and territories, if applicable. Suppliers shall, when requested, provide Millennium with the right to obtain documented confirmation of compliance.

7.6 Sub-contract Labour

Suppliers must not sub-contract any part of the work without prior written authorisation from Millennium

8 Environmental Management

Millennium understands that our operations have an impact on the environment and we are committed to working with suppliers to minimise our global footprint. Millennium suppliers must comply with the following minimum requirements.

8.1 Legislative compliance

Suppliers must

- Comply with all relevant laws, regulations and standards on environmental management and reporting
- Implement and maintain a written environmental policy
- Establish and maintain data collection processes that supports environmental reporting and compliance with regulatory requirements
- Maximise the efficient use of natural resources, energy, water and raw material and minimise pollution and waste.
- Dispose of waste in accordance with regulatory and site requirements

8.2 Environmental Protection

Suppliers must

- Conduct business in a way that will minimise adverse effects on the environment; and
- Promptly notify Millennium of any actual or threatened environmental harm.

9 Community

Millennium aims to work with suppliers that can demonstrate that they share our commitment to positive engagement with the communities in which we operate.

10 Supply Chain

At a minimum, Millennium suppliers must ensure that any persons or organisations in their own supply chain also comply with the principles outlined in this Supplier Code of Conduct. Under the Modern Slavery Act 2018, this includes suppliers of goods and/or services and is not limited to their Australian operations.

APPROVED SUPPLIER ACCREDITATION

Suppliers (including contractors) who would like to offer goods and/or services to Millennium must be prequalified.

This is to ensure suppliers have all the necessary policies, processes, insurances, certifications. documentation and licences in place to fulfil their responsibilities and obligations as part of their contracted services for Millennium.

As goods and/or services are required Millennium will engage with suppliers who are current on the Millennium Approved Supplier Register.

1. Approved Supplier

In requesting prequalification to supply goods and/or services to Millennium, the respondent agrees to the following minimum requirements:

- Comply with the Millennium Supplier Code of Conduct
- Complete an Approved Supplier Application form
- Submit copies of all relevant insurances, licences, certifications and other applicable documentation as stipulated on the Approved Supplier Application form

2. Achieving Approved Supplier Accreditation

If your request for prequalification is approved by Millennium you will be added to the Approved Supplier Register. This will remain in place for 12 months or until those times when a notable change or breach in the services is identified, at which time accreditation will be reviewed. It is important that all approved suppliers provide Millennium with current documentation as they are renewed.

Millennium shall revoke the accreditation where the accreditation has expired by more than 60 days without receiving the required documentation.

3. Loss of Approved Supplier Accreditation

Millennium reserves the right to rescind Approved Supplier Accreditation. Reasons can include but not limited to:

- A breach of legislative, contractual or Supplier Code of Conduct requirements
- Non-conformance with Millennium or site requirements

Re-accreditation may be granted if the supplier can demonstrate rectification of the breach or non-conformance and meet the accreditation criterion.

4. Supplier of Service

A Supplier engaged to provide a service to Millennium must comply with the standards outlined in the Supplier Code of Conduct.