

# Horizon Power Supplier Code of Conduct

At Horizon Power our purpose is to deliver energy solutions for regional growth and vibrant communities.

We want to work with organisations that share our ambition and values, who we can trust to deliver high quality and ethically sourced goods and services.

This Supplier Code of Conduct (Code) establishes our minimum standards of conduct and expectations of our suppliers and their supply chains. Suppliers who engage subcontractors when providing goods or services to us must make them aware of our Code.

We require our suppliers to comply with all applicable laws and, in all cases, to meet the

standards and principles set out in this Code across all areas of their business. Compliance with this Code is a material consideration for us in assessing every aspect of our supplier relationships.

We reserve the right to undertake due diligence and risk assessments to verify compliance with this Code and expect our suppliers to cooperate and provide supporting evidence as required to monitor and review their compliance.

**Horizon Power has developed Guiding Principles that support decision making throughout our business. Our Guiding Principles are:**



**Community involvement**



**Regions first**



**Cleaner, Greener**

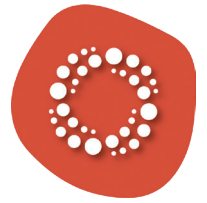


**Aboriginal and Torres Strait Islander Commitment**

Together with our Guiding Principles, our decision making is guided by our four core values: Safety, Team, Integrity and Customer.

**By working with us, you confirm your acceptance of this document.**

# Safety



We look after each other and our communities, and believe that safety and wellbeing are everyone's responsibility. We are committed to minimising risks to our people, customers and communities.

We take our obligation to provide a healthy and safe workplace seriously and expect the same commitment from our suppliers.

## Our suppliers must:

- provide and maintain a safe working environment and safe systems of work.
- provide adequate workplace facilities for their workers' welfare (including suitable accommodation, amenities, potable water, and cooking facilities).
- identify, assess, and control all health and safety risks associated with work requirements.
- comply with all applicable and relevant laws and regulations in relation to workplace health and safety.
- ensure all workers are trained and competent for the work they perform.
- ensure all workers undertaking work for Horizon Power complete relevant inductions and authorisations prior to starting work.
- comply with all reporting requirements prescribed by Horizon Power or under legislation.

# Team



We provide safe and reliable power to more than 46,000 residential, business and pre-paid customer accounts, servicing an area of over 2.3 million square kilometres across regional and remote WA. We value the growth of local communities, designing affordable and sustainable solutions tailored to each community to stimulate local employment and economic activity.

As a team, we provide an inclusive workplace free from discrimination, harassment and bullying. We expect our employees to treat our suppliers and subcontractors with respect as they work together with integrity and inclusivity.

Alongside physical safety, we work to ensure the cultural safety of our employees, with the goal of providing a supportive workplace where everyone feels safe to be themselves. Accordingly, we want to work with suppliers who also embrace inclusive workplace principles.

## Our suppliers must:

- actively engage with local communities and foster a workplace which is inclusive of people of all cultural backgrounds and beliefs.
- seek to engage with Aboriginal and Torres Strait Islander peoples to provide employment and procurement participation opportunities.
- provide a safe and inclusive workplace environment, free of all forms of discrimination and harassment.
- observe and implement fair business practices with their own suppliers and subcontractors, including providing timely payment and reasonable contractual conditions.

Through our supply chain (both direct and indirect), we seek to engage suppliers who have diverse ownership, such as Indigenous-owned businesses as well as disability and social enterprises. We work with our suppliers to identify appropriate opportunities across our supply chain to engage diverse businesses in the delivery of goods and services to Horizon Power.

# Integrity

We conduct our business in an ethical and lawful manner – and we want to work with suppliers who operate in a similar manner. We expect our suppliers to comply with all relevant rules and processes when working with us.

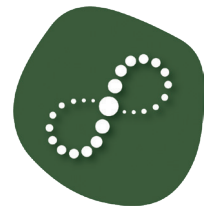


## Our suppliers must:

- comply with all applicable laws relating to the prevention of bribery, corruption, fraud, tax evasion, money laundering or similar or related activities.
- identify and report any actual, potential or perceived conflict of interest, be it competing personal or professional interests. We expect our suppliers to avoid even the appearance of actual, potential or perceived conflicts of interest in their work with us.
- not offer Horizon Power staff any payments, hospitality, gifts, benefits, favours or entertainment beyond what is reasonable or legitimate business practice, or which could be seen to be improper, conditional, or an incentive or reward for preferential treatment, or which are not in line with the general expectations of the communities Horizon Power serves (including, cash or items easily convertible to cash).
- in all dealings with us, not engage directly or indirectly in trade activities or include in the supply chain any goods or services sourced from sanctioned persons, countries or organisations.
- comply with all applicable sanctions laws, including local or regional sanctions as mandated by the Government for the relevant jurisdiction applicable to us.
- maintain a policy and exercise due diligence to reasonably assure that the minerals and components they use in their supply chain do not result from human rights abuses in either the mining or processing stages.

# Human rights

As set out in our Human Rights Policy, Horizon Power is committed to respecting human rights across both our operations and our supply chain. We have an important role to play in fostering ethical business practices in our industry that help to address modern slavery and protect human rights.



We're privileged to work in areas with vast cultural and historical significance and expect our suppliers to interact with Aboriginal communities and customers in a way that is respectful, culturally appropriate and responsive.

## Our suppliers must:

- ensure workers have freely chosen employment, with no forced, bonded or indentured labour.
- avoid unreasonably restricting workers' freedom to move into, out of or at working facilities.
- ensure that workers under the age of 18 do not perform work that is likely to jeopardise their health or safety, including night shifts and overtime.
- not permit harassment, abuse, corporal punishment or inhumane treatment of its workers.
- permit freedom to move and associate, including collective bargaining and seek representation in accordance with local laws.
- offer fair and transparent terms and conditions of employment including fair remuneration that provides for an adequate standard of living, working hours and working conditions.
- ensure measures are taken to be aware of, preserve and protect registered and potential heritage sites in our service areas.
- notify us if they, or their subcontractors or suppliers, have been convicted, had a notice served upon them, or an order made against them for infringement of modern slavery laws anywhere in the world.
- have in place adequate procedures to identify, prevent, mitigate and account for modern slavery and other human rights impacts in their operations and supply chains.
- ensure that their operations or supply chains do not adversely impact local communities, including human rights and land rights, with specific consideration to Indigenous communities' rights to free, prior and informed consent.
- provide stakeholders and workers access to a grievance mechanism to raise concerns confidentially without fear of retaliation.

# Environment

We're committed to a cleaner, greener energy future, and expect our suppliers to share this commitment.

## Our suppliers must:

- comply with all applicable environmental laws and notify us if they cause, or their subcontractors or suppliers cause, pollution or any other environmental incident that is likely to give rise to a breach of environmental laws or significant reputational damage.
- continually strive to improve the climate change impact and sustainability performance of their business, focusing on reduction of materials use, waste, greenhouse gas emissions, water and natural resources consumption.
- monitor, treat and reduce hazardous air emissions, wastewater and waste generated from operations.
- consider the cradle-to-cradle environmental impacts, disposal requirements of materials and infrastructure, and opportunities for reuse within the company and by others in the broader community.
- carry out any required environmental and/or sustainability reporting required by Horizon Power or other authorities.
- take steps to improve and enhance the land, natural and built environments and the liveability of our regional communities.

# Intellectual property, privacy and confidentiality

## Our suppliers must:

- act in a manner which protects intellectual property rights by:
  - requesting and obtaining prior authorisation before using, or causing to be used, any third party intellectual property;
  - abiding by any applicable intellectual property agreements, limitations or terms of use when using or authorising the use of any third party intellectual property; and
  - not infringing, or contributing to the infringement of, any third-party intellectual property rights.
- protect the privacy of personal information of everyone with whom they do business and comply with all applicable privacy, data protection and cybersecurity laws and regulations.
- safeguard personal information, confidential information and trade secrets to which they have access in connection with their provision of goods or services to Horizon Power.
- implement security standards and procedures to ensure that personal information, confidential information and trade secrets are securely stored, disclosed only on a need-to-know basis and used only for permitted purposes.
- have an appropriately documented and tested cybersecurity incident and breach management plan that meets regulatory reporting obligations in case of an incident (e.g., data loss, privacy breach, cyber incident).

# Questions and Concerns

We expect our suppliers to monitor compliance with this Code and to notify us immediately if any breaches occur. Accordingly, we ask our suppliers to take reasonable steps to address, remedy and prevent repetition of any breach (or possible breaches) of this Code.

When we identify instances of a supplier's non-compliance with the Code, we will investigate to understand the causes and take appropriate actions including requiring the implementation of corrective action plans. We require our suppliers to cooperate in the investigation and provide Horizon Power access to relevant information upon reasonable request. Repeated violations of this Code will result in the termination of our relationship with the supplier.

If you have questions or concerns about proper conduct or the content of this Code, or would like to report a breach of this Code, please refer to [Horizon Power's Public Interest Disclosure Policy](#).