

Policy

Supplier Code of Conduct

Operations

Approver's name and title:

Kate Evans, Chief Financial and Operations Officer

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Review date:

Classification



Capella Capital Supplier Code of Conduct

Capella Capital is committed to ethical, sustainable, and socially responsible procurement. The Capella Capital Supplier Code of Conduct (Supplier Code) outlines the minimum standards expected of all suppliers, contractors, consultants, and third-party service providers (collectively, “Suppliers”) who provide goods or services to Capella Capital.

The Supplier Code applies to all Suppliers engaged by Capella Capital, regardless of geography or contract type. It complements contractual obligations and applicable laws and regulations, and does not supersede them.

Integrity and Ethics and Legal Compliance

Suppliers must conduct their business honestly and transparently, complying with all relevant laws and regulations. Any actual or potential conflicts of interest must be disclosed to Capella Capital. Suppliers are strictly prohibited from offering, giving, soliciting, or accepting bribes, facilitation payments, or any other improper benefits. All forms of corruption, fraud, money laundering, and anti-competitive behaviour are unacceptable.

Labour and Human Rights

Suppliers are required to comply with all applicable labour laws and regulations. Capella Capital expects suppliers to prohibit child labour, forced labour, and discrimination of any kind. Suppliers must respect the rights of workers to freedom of association and collective bargaining, and ensure fair wages, reasonable working hours, and safe working conditions. All workers must be treated with dignity and respect.

Modern Slavery

Capella Capital is committed to upholding human rights and preventing all forms of modern slavery, including forced labour, servitude, debt bondage, and human trafficking.

Suppliers must ensure that their operations and supply chains are free from modern slavery and comply with all applicable laws and regulations relating to human rights and anti-slavery. Suppliers are expected to take proactive steps to identify, assess, and address risks of modern slavery, including conducting due diligence on their own suppliers and subcontractors. Any suspected instances of modern slavery must be reported immediately to Capella Capital. Failure to comply with these requirements may result in termination of engagement and referral to relevant authorities.

Health and Safety

Suppliers must provide a safe and healthy work environment for their employees and others affected by their operations. Compliance with all relevant occupational health and safety laws is mandatory. Suppliers are expected to promptly report any incidents or hazards that may impact Capella Capital’s operations and to provide appropriate training and protective equipment to their workforce.

Environmental Management

Suppliers are expected to minimise their environmental impact and comply with all applicable environmental laws. Capella Capital encourages suppliers to adopt sustainable practices, use resources responsibly, and prevent pollution. Suppliers should support Capella Capital’s environmental objectives and targets.

Corporate Governance and Transparency

Suppliers must maintain accurate records and financial reporting, and cooperate fully with audits and compliance reviews as required by Capella Capital. Confidential information must be protected, and privacy rights respected at all times.

Gifts, Benefits and Hospitality

Suppliers must not offer gifts, benefits, or hospitality that could improperly influence business decisions or create a perception of impropriety. If in doubt, suppliers should seek guidance from Capella Capital.

Diversity, Inclusion and Respect

Capella Capital expects suppliers to foster a diverse and inclusive workplace, free from harassment, bullying, and discrimination.

Compliance Monitoring and Reporting

Suppliers are responsible for regularly reviewing this Code and ensuring ongoing compliance. Capella Capital reserves the right to audit supplier practices and require corrective actions where necessary. Breaches of this Code may result in termination of engagement or referral to relevant authorities.

Suppliers are encouraged to raise concerns or seek clarification about this Code. Capella Capital provides a confidential reporting platform, Vault, for the secure and anonymous submission of workplace concerns, misconduct, or grievances. Reports can be made at any time via Vault at <https://www.capellacapital.com.au>.

Updates and Amendments

Capella Capital may update this Code to reflect evolving standards and expectations. Suppliers are expected to stay informed and comply with the latest version.

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