



June 2023

Supplier Code of Conduct

Nanosonics Limited
ABN 11 095 076 896

NANOSONICS' MISSION AND VALUES

Our Mission

To improve the safety of patients, clinics, their staff and the environment by transforming the way infection prevention practices are understood and conducted, and introducing innovative technologies that deliver improved standards of care.

Our Core Values

Collaboration

We do things together because we value diversity of opinion, perspective and knowledge and are stronger when we work as a team.

Innovation

We innovate because we want to continuously make things better adding value to our customers, our operations and our business.

Discipline

We do things right because we are ethical, compliant and are clear about our responsibility and accountability for delivering on our commitments.

Agility

We are effective because we not only embrace but drive change, we are continuously learning and can adapt quickly.

Will to Win

We do things with a sense of urgency anticipating market and customers' needs because we always strive to be the best with a will to win.

1. INTRODUCTION

1.1 What is the Nanosonics' Supplier Code of Conduct?

Nanosonics cares about its employees, community, suppliers, and workers in its supply chain and the way its suppliers do business.

Nanosonics is committed to implementing responsible environmental, social and governance practices throughout the Nanosonics business and its supply chain.

This Supplier Code of Conduct (the 'Code') outlines the standards that Nanosonics expects from its suppliers and their supply chains to support these commitments.

The purpose of the Code is to ensure that all participants in our supply chain understand these expectations and that all direct suppliers agree to comply with or work with us to improve practices to meet these standards, and all applicable laws and regulations.

1.2 Who must comply with the Code?

The Code applies to all suppliers to Nanosonics and its related bodies corporate. The terms of this Code will be read in conjunction with any other agreement in place between Nanosonics and any of its direct suppliers.

2. LABOUR PRACTICES

2.1 Labour and human rights

Suppliers will ensure all its workers (including employees and contractors) are treated with dignity and respect, and provide a fair and ethical workplace free from workplace bullying, harassment, victimisation, and abuse, including:

- Not using or condoning the use of any forms of modern slavery, including human trafficking, forced labour, child slavery, forced and early marriage, deceptive recruitment, servitude, and debt bondage. Complying with local and national laws and regulations including those pertaining to wages, overtime and benefits.
- Respecting the right of employees to freedom of association, freedom of expression, and the right to be heard.
- Not using or condoning corporal punishment, threats of violence or other forms of physical, sexual, psychological, or verbal harassment or abuse.

Nanosonics works with its suppliers to encourage appropriate standards on labour practices are upheld. All suppliers must provide reasonable and timely assistance to Nanosonics and respond to all requests relating to compliance with modern slavery and conflict minerals legislation.

2.2 Safety and Wellbeing

Suppliers will provide a safe work environment and integrate sound health and safety management practices into their business. Suppliers must comply with all applicable laws and regulations relating to workplace, health, and safety.

2.3 Collective Bargaining

Supplier's workers must be free to join or not join a union or employee representation of their choice, free from threat or intimidation. Subject to the local laws of the Supplier's country of operation, if the Supplier's workers have lawfully chosen to be represented by a union or employee representation, the Supplier

must bargain in good faith and not retaliate against their workers for their lawful participation in union or employee representation activities.

3. ENVIRONMENT AND SUSTAINABILITY

3.1 Legislative Compliance

Suppliers will comply with all applicable national, state, regional and local government environmental legislation and licensing requirements. Where applicable, we expect our suppliers to maintain and disclose when requested or proactively update materials composition and compliance information in a timely manner.

3.2 Sustainability Improvements

Suppliers will minimise the environmental impact of their operations and maintain environmentally responsible and sustainable policies and practices.

4. BUSINESS INTEGRITY

4.1 Avoiding Conflicts of Interest

Suppliers will immediately report any conflicts of interest, whether real or perceived to Nanosonics. A conflict of interest can arise when a person's business and private interests intersect. Private interests can include a person's own professional and financial interests, as well as past and present associations with other individuals, groups, or family.

4.2 Anti-Bribery and Anti-Corruption

Suppliers must act in compliance with the [Anti-Bribery and Anti-Corruption Policy](#), all applicable laws, regulations, and industry standards and not offer nor accept bribes (typically, anything designed to exert improper influence such as a direct or indirect promise, offering, or authorisation, or anything of value (whether the value is material or not), gifts, hospitality, money, loans or favours), or kickbacks (typically, payments made in return for a business favour or advantage) or improper payment from anyone for the purpose of obtaining, retaining, or directing business to any person or entity, as prohibited by applicable local and international laws.

4.3 Information Security, Data Protection and Confidentiality

Supplier will adhere to applicable data protection and security laws and regulations, regarding personal data of workers, customers, and other relevant third parties. Supplier will comply with all said requirements when personal data is collected, stored, used, transferred, and disposed of, including taking appropriate steps to safeguard any personal information received from Nanosonics against unauthorized or unlawful use, disclosure, access, loss, alteration, damage and destruction and having in place action plans to remedy any kind of breach of data privacy.

Supplier will safeguard and make only legitimate use of confidential information. Supplier will not disclose any information that is not known to the general public. Confidential information must be stored in a secure manner to prevent unauthorized access.

4.4 Fair Market Conduct

Suppliers will ensure that it engages in market practices that are ethical, fair, and compliant with all trade practices laws. Suppliers will comply with applicable competition and anti-trust laws.

4.5 Sanctions and International Trade

Suppliers will comply with all applicable local and international trade laws with regards to imports, exports, sanctions, embargoes and international financial transactions.

Suppliers must implement measures to ensure they do not purchase goods or services from or support groups which may directly or indirectly fund or support criminal activity, unlawful violence, exploitation, or terrorist groups.

5. AUDIT AND ASSURANCE PROCESSES

5.1 Supplier Due Diligence

Suppliers will take necessary measures to ensure that their suppliers, partners and distributors comply with all labour rights, safety, environmental sustainability, and ethical trading requirements described in this Code.

5.2 Internal Audit

Suppliers will carry out, and record, their own inspections, and regular internal audits to ensure implementation of their own policies and procedures that reflect the principles of this Code.

5.3 Enforcing the Code

Suppliers will have a robust corrective action process to drive improvement in safety, sustainability, labour standards and ethical trading practices. If potential breaches of this Code are detected, the relevant supplier will implement changes in accordance with requested corrective action plans. Ongoing or repeated non-compliance with this Code, however, will activate a review of the supplier's commercial relationship with Nanosonics.

While this Code sets forth clear expectations of our suppliers, Nanosonics also acknowledges that each supplier is unique and circumstances may vary. Therefore, Nanosonics reserves the right to enforce this Code or waive a non-conformance with certain requirements under this Code, considering factors such as the specific supplier and the prevailing circumstances. This flexibility allows for Nanosonics to address individual situations in a fair and reasonable manner, while upholding its commitment to implementing responsible environmental, social and governance practices in its supply chain.

5.4 Reporting

Suppliers must notify Nanosonics if they do not meet the requirements of this Code or upon becoming aware of any breach of this Code, including any action by a government authority (including without limitation any investigation or prosecution) concerning actual or alleged non-compliance with the requirements of this Code.

Nanosonics reserves the right to require suppliers to provide any relevant information including information or documentation related to items in this Code if deemed necessary. Nanosonics may submit supplier questionnaires for this purpose. Suppliers must permit Nanosonics or its delegate to conduct on-site audits, with reasonable notice, including having access to workers for the purpose of interviews if deemed necessary.

Nanosonics reserves the right, upon reasonable notice, to confirm any supplier's compliance with the requirements of any aspect of this Code.

Suppliers may contact the relevant Nanosonics Procurement Staff or the Nanosonics General Counsel on (02) 8063 1600 or +61 2 8063 1600 outside Australia.

6. ADMINISTRATIVE MATTERS

6.1 Accessing the Code

A copy of this Code is available on the Nanosonics' website.

6.2. Questions about the Code

All questions about this Code can be directed to the Head of Procurement and Commercial Projects.

6.3 Review of the Code

Nanosonics reserves the right to amend or modify this Code from time to time. Nanosonics will notify suppliers of significant changes to the requirements within this Code.

Suppliers are responsible for responding to such communications and taking necessary steps to change their practices accordingly.