

Integrated Management System

Supplier Code of Conduct

DTI-PR-PO002

VERSION HISTORY

Version no.	Issue date	Amendment description
1.0	28-May-24	Initial Release
2.0	17-July-24	Updated Document Classification
3.0	26-August-25	Updated Preparer, Approver and CEO Sign-Off

ISSUE

	Name	Role	Date
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Approved by	John Anderson	CEO	26/08/2025

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1 INTRODUCTION

DT Infrastructure is committed to the highest standards of ethics, integrity, and professionalism in all aspects of our operations and in compliance with all applicable laws. We expect our suppliers to uphold the same standards.

This Code of Conduct (hereafter referred to as "Code") outlines the expectations for behaviour and practices for all suppliers and subcontractors engaged with DT Infrastructure in the areas of ethics, labour practices, health and safety, environmental stewardship, and management practices. The Code is designed to complement and align with our Employee Code of Conduct, ensuring consistency across all interactions within our business environment.

2 SCOPE

This Code is applicable to all suppliers and subcontractors (hereafter referred to as "Suppliers") engaged by DT Infrastructure, including those involved in any capacity with our projects. It establishes behavioural standards that are underpinned by DT Infrastructure's principles of Integrity, Accountability, Innovation, and Delivery.

3 VALUES

DT Infrastructure undertakes its business in accordance with its 5 core values and expects its Suppliers to undertake their business operations having regard to the same:

- ▶ Take Personal Ownership: Accountability for results and striving for excellence are expected.
- ▶ Walk the Talk: Actions should align with words; leading by example is crucial.
- ▶ Open, Honest Communication: We value open discussions and diverse viewpoints.
- ▶ Real Teamwork: Collaboration across divisions to break down silos is essential.
- ▶ Develop Our People: Investing in the development and growth of our teams is a priority.

4 COMPLIANCE AND STANDARDS OF BEHAVIOUR

Ethical Behaviour and Integrity: Suppliers are expected to act in accordance with this Code, demonstrating honesty, integrity, and transparency in all dealings. Conflicts of interest must be effectively managed and promptly disclosed.

Legal Compliance: Suppliers must adhere to all applicable laws and DT Infrastructure policies. In instances where this Code sets higher standards than local laws or norms, the standards of this Code will prevail.

Corporate Governance and Business Practices: Suppliers are required to conduct their operations fairly and professionally, ensuring compliance with laws related to safety, fraud, corruption, and unethical behaviour.

5 HEALTH, SAFETY AND ENVIRONMENT

DT Infrastructure prioritises a safe and healthy working environment. Suppliers must observe and comply with all safety regulations and laws.

Commitment to environmental sustainability is crucial. Suppliers are expected to minimise environmental impacts, adhere to environmental laws and DT Infrastructure's environmental policies, and immediately report any environmental incidents

6 PEOPLE AND WORKPLACE BEHAVIOUR

Diversity and Inclusion: DT Infrastructure is dedicated to creating a diverse and inclusive environment. Suppliers must support this commitment, ensuring their workplaces are free from bullying, harassment, discrimination, or vilification.

Human Rights: Suppliers must respect human rights and take a zero-tolerance approach to modern slavery, child labour, and human trafficking.

Privacy: Suppliers must treat personal information lawfully and fairly, in line with DT Infrastructure's Privacy Policy.

7 STAKEHOLDER AND COMMUNITY ENGAGEMENT

DT Infrastructure is committed to acting responsibly within the environment and local communities. Suppliers are expected to conduct themselves respectfully and positively impact the communities where we operate.

Suppliers should consider opportunities to support these communities, including exploring procurement opportunities for small and medium enterprises, Indigenous businesses, social enterprises, and disadvantaged groups.

8 WORKING PRACTICES

Anti-Bribery and Corruption: Suppliers must avoid all forms of bribery and corruption, adhering to relevant laws and DT Infrastructure's Anti-Bribery and Corruption Policy. This includes prohibiting facilitation payments.

Gifts and Hospitality: Any gifts or hospitality offered or accepted must be for legitimate business purposes, not intended to influence business decisions unduly. Suppliers must not request gifts or hospitality.

Anti-Competitive Conduct: Suppliers must maintain DT Infrastructure's independence and avoid anti-competitive conduct.

Confidential Information: Suppliers must not use any confidential information about DT Infrastructure, competitors, joint venture partners, customers, or suppliers for personal benefit or convey this information to others before it becomes public.

9 WORKING WITH THIRD PARTIES

DT Infrastructure requires that Suppliers adhere to this Code or demonstrate compliance with equivalent standards. Suppliers are responsible for conducting due diligence before engaging in any commercial relationships on behalf of DT Infrastructure.

10 ASSETS AND RESOURCES

Suppliers must respect and protect DT Infrastructure's assets and resources, using them only for legitimate business purposes. This includes physical property, funds, intellectual property, and confidential information.

11 REPORTING AND INVESTIGATING BREACHES

Suppliers are encouraged to report any breaches or suspected breaches of this Code. Suppliers are encouraged to follow the DT Infrastructure Speak Up Policy. DT Infrastructure is committed to protecting whistleblowers from victimisation, ensuring confidentiality, and conducting thorough investigations of all reported concerns.

All reported breaches will be investigated. If a breach is found to have occurred, DT Infrastructure will take appropriate action, which may include requiring corrective action or terminating the supplier relationship.

12 DECISION-MAKING FRAMEWORK

Suppliers should assess their decisions against this Code, considering the potential perceptions and impacts of their actions. DT Infrastructure encourages Suppliers to seek guidance whenever there is doubt about the appropriate course of action.

13 ACKNOWLEDGEMENT

Suppliers engaged with DT Infrastructure are required to acknowledge their understanding and commitment to uphold the standards outlined in this Code, fostering a partnership based on mutual respect, integrity, and success.

14 CONCLUSION

This Code of Conduct ensures that DT Infrastructure's approach to construction and infrastructure development is ethical, responsible, and sustainable. Adherence to this Code by our Suppliers is essential to maintaining the integrity and success of our projects and business relationships.



John Anderson | CEO
DT Infrastructure Pty Ltd